

January 18, 2018

Selena Kelaher, Associate Planner
City of Santa Ana
20 Civic Center Plaza
Santa Ana, CA 92701

Subject: Response to Comments—2129 N. Main Street Hampton Hotel Project

Dear Ms. Kelaher:

FirstCarbon Solutions is pleased to submit this Response to Comments letter for the proposed 2129 N. Main Street Hampton Hotel development (project) in the City of Santa Ana.

To date, the following seven letters have been received with regard to the proposed project:

- Letter #1: Letter from Department of Toxic Substances Control, dated December 6, 2017
- Letter #2: Letter from Alston & Bird, dated December 7, 2017
- Letter #3: Letter from Alston & Bird, dated December 11, 2017
- Letter #4: Letter from the City of Irvine Community Development Department, dated December 11, 2017
- Letter #5: Letter from the County of Orange Public Works Department, dated December 11, 2017
- Letter #6: Letter from Orange County Transportation Authority, dated December 11, 2017
- Letter #7: Letter from the California Department of Transportation, District 12, dated December 12, 2017

Although the public review period for the 2129 N. Main Street Hampton Hotel Project Initial Study/Mitigated Negative Declaration (IS/MND) ended on December 11, 2017, the correspondence received from the California Department of Transportation, District 12 is addressed herein.

Although a lead agency is not required to provide written responses to comments on negative declarations or mitigated negative declarations under the California Environmental Quality Act (CEQA), the City of Santa Ana has evaluated the comments received on the 2129 N. Main Street Hampton Hotel Project IS/MND, and has elected to provide responses to comments, as well as refinements to the draft IS/MND.

This letter includes a list of the comments and responses to comments on the Draft IS/MND, and any refinements and clarifications to the IS/MND have also been included. Copies of all letters received regarding the IS/MND are included in Attachment A.

Should you have any questions, please do not hesitate to contact us.

Sincerely,



Cecilia So, Project Manager
FirstCarbon Solutions
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Enc: Attachment A: Comment Letters

UNITED STATES

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Bay Area
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Central Valley
7265 N First Street, Suite 101
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SUBSTITUTION OF MITIGATION MEASURES

Pursuant to CEQA Guidelines Section 15074.1, as a result of the public review process for a proposed mitigated negative declaration, including any administrative decisions or public hearings conducted on the project prior to its approval, the lead agency may conclude that certain mitigation measures identified in the mitigated negative declaration are infeasible or otherwise undesirable. Prior to approving the project, the lead agency may, in accordance with this section, delete those mitigation measures and substitute for them other measures which the lead agency determines are equivalent or more effective.

Prior to deleting and substituting for a mitigation measure, the lead agency shall do both of the following:

- (1) Hold a public hearing on the matter. Where a public hearing is to be held in order to consider the project, the public hearing required by this section may be combined with that hearing. Where no public hearing would otherwise be held to consider the project, then a public hearing shall be required before a mitigation measure may be deleted and a new measure adopted in its place.
- (2) Adopt a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

The following mitigation measures related to impacts to cultural resources are currently included in the IS/MND:

MM CUL-1 Melton House Move

The project proponents shall retain the services of a qualified architectural historian (as defined by the Secretary of the Interior's Professional Guidelines) with a minimum of 10 years' experience, or a qualified historic architect (as defined by the Secretary of the Interior's Professional Guidelines) to review and approve the proposed plans for the removal, and relocation of the Melton House under the guidelines presented in *Moving Historic Buildings* by John Obed Curtis, Technical Preservation Service Division, U.S. Department of Interior; 1979.

MM CUL-2 Melton House Documentation

The project proponents shall retain the services of a professional photographer to capture digital photographs of the interior and exterior of the Melton House, and the streetscapes of North Bush Street and North Main Street, to create a record of the building's current condition, the current cityscape setting/location/feeling of the area from which the building is being removed, and where it will be relocated. Photographs

will be printed in color in 5-inch by 7-inch format, and a shot-sheet of the location of where the individual photographs were captured will be prepared. A minimum of three hard copies and three digital copies of the photographic record will be created, of which one copy shall be contributed to each of the following: the Orange County Archives, Orange County Historical Society, and City of Santa Ana Library—Local History Room.

MM CUL-3 Melton House Setting

Relocation of the Melton house will maintain the integrity and architectural significance of the resource through the use of the Secretary of Interior’s Standards for Rehabilitation. Selection of a new site for the Melton House requires planning in advance of the move to create a setting as much like the original Bush Street setting as possible. The selection of a new setting shall comply with the Secretary of the Interior’s Standards for Rehabilitation, including, but not limited to:

- A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
- The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
- Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

- New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

MM CUL-4 Melton House and MacFarlane House Rehabilitation

Rehabilitation of each building shall comply with the Secretary of the Interior’s Standards for Rehabilitation to preserve the aspects of integrity of each building so that each may continue to convey its historic significance, including, but not limited to:

- A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
- The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
- Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
- Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The City of Santa Ana would like to substitute the above mitigation measures with the following:

- MM CUL-1** Prior to issuance of a building permit for the project, the City of Santa Ana shall ensure that the two buildings which have been identified as historical resources, the Melton House and the A. Remsberg (MacFarlane) House, shall be documented in accordance with the recommendations for the Historic American Buildings Survey. Such documentation shall be compiled by an architectural historian or other professional who satisfies the Secretary of the Interior’s Professional Qualifications Standards. The documentation shall include an architectural description and a statement of significance, photography, site plan, and supporting research. The completed documentation package shall be deposited with the City of Santa Ana and offered to the City of Santa Ana Public Library History Room, Orange County Archives, Orange County Historical Society, Santa Ana Historical Preservation Society, South Central California Information Center at CSU Fullerton, University of California Irvine Special Collections, and/or other repository that the City deems appropriate.
- MM CUL-2** In order to minimize adverse impacts to the Melton House resulting from its relocation from North Bush Street to North Main Street, the City shall ensure that the relocation is planned and executed, in so far as is feasible, in accordance with John Obed Curtis, Moving Historic Buildings, and in light of modern relocation practices. A Historic Architect or other professional meeting the Secretary of the Interior’s Professional Qualifications Standards shall be retained to oversee the move, including (but not limited to): preparation of the house prior to the move to minimize damage to character-defining features; receiver site selection and orientation; relocation monitoring; foundation reconstruction; and setting re-creation.
- MM CUL-3** The City of Santa Ana shall ensure that the relocation of the Melton House and the rehabilitation and adaptive reuse of the Melton House and the A. Remsberg (MacFarlane) House shall conform to the Secretary of the Interior’s Standards for the Treatment of Historic Properties. A Historic Architect or Architectural Historian meeting the Secretary of the Interior’s Professional Qualifications Standards shall be retained to advise, guide, and monitor the rehabilitation. The qualified professional shall: identify the character-defining features of each of the two houses and map the features on architectural drawings; review project plans for conformance with the Standards; monitor the construction to resolve construction issues; and certify that the completed project complies with the Standards.

The above mitigation measures are “equivalent or more effective” within the meaning of CEQA Guidelines Section 15074.1. At the public hearing for the project, the City of Santa Ana shall adopt a finding that these measures are equivalent or more effective and that they will not result in any greater environmental impacts.

RESPONSE TO COMMENTS

The comment letters are included in Attachment A of this memo and are included below. A list of public agencies, organizations, and individuals who commented on the Draft IS/MND is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Author	Code
Department of Toxic Substances Control	DTSC
Alston & Bird	ALSTON-1
Alston & Bird	ALSTON-2
City of Irvine Community Development	IRVINE
County of Orange Public Works	ORANGE
Orange County Transportation Authority	OCTA
California Department of Transportation, District 12	DOT

Letter from Department of Toxic Substances Control, dated December 6, 2017

Comment DTSC-1

The ND should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

Response to DTSC-1

A Phase I Environmental Assessment was prepared for the project by Lead Tech Environmental dated January 24, 2017 and was included as Appendix C.3 of the IS/MND.

Comment DTSC-2

If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.

Response to DTSC-2

According to the Phase I Environmental Assessment prepared for the project by Lead Tech Environmental dated January 24, 2017 (included within IS/MND Appendix C.3), there is no evidence of recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs) in connection with the subject property, with the exception of the following:

- The subject property address 2115 North Main Street was identified as a SWEEPS UST and CA FID UST site in the Environmental Data Resources, Inc. (EDR) environmental regulatory database report. According to the database report, MacFarlane Electric, the former tenant at 2115 North Main Street, was historically equipped with a 550-gallon capacity underground storage tank (UST) containing gasoline. According to environmental documentation provided by the client, which included documentation and correspondence from the City of Santa Ana Fire Department, one 550-gallon capacity UST containing gasoline and an associated pump dispenser was located on the eastern portion of the commercial property address 2115 North Main Street, south of the combination commercial office building/garage building. This UST was reportedly removed from the subject property by Fuelcom Systems, Inc. on April 10, 1992. Fuelcom Systems, Inc. collected a total of four soil samples, including two soil samples from the northern and southern sides of the UST pit, under the pump dispenser, and the soil pile from the UST pit. The soil samples were submitted to Associated Laboratories and tested for gasoline (EPA Method 8015), BTEX (EPA Method 8020) and lead (DOHS LUFT). All laboratory results were reported as non-detect (ND). Based on the above, on September 1, 1994, the City of Santa Ana Fire Department issued a letter stating that “no further soil remediation” was required at the subject property at the time of letter issuance. Based on the reported removal of the UST, the analytical results and the regulatory closure, the former on-site UST is considered a historical recognized environmental condition and no further action is considered necessary.

Comment DTSC-3

If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).

Response to DTSC-3

Comment noted. As stated in the IS/MND, the SARWQCB issued an NPDES permit, which includes the City as a Permittee. The NPDES permit implements federal and state law governing point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States.

The project is also subject to comply with on-site sewer cleaning requirements. Regular cleaning is a requirement under the State of California, State Water Resources Control Board Order No. 2006-0003, and Statewide General Waste Discharge Requirements (WDR) for Wastewater Collection Agencies, adopted on May 2, 2006.

Wastewater from the project would mainly consist of effluent typical of commercial hotel uses. The hotel would contain small quantities of household hazardous materials such as cleaning solvents, but these quantities would not be sufficient to exceed treatment requirements. Additionally, the project would be required to comply with all applicable regulations and standards, including the NPDES permit requirements and RWQCB standards.

Comment DTSC-4

If the site was used for agricultural or related activities, residual pesticides may be present in on-site soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides.

Response to DTSC-4

Comment noted. According to the Phase I Environmental Assessment prepared for the project by Lead Tech Environmental dated January 24, 2017 (included within IS/MND Appendix C.3), the project site was not used for agricultural purposes.

Comment DTSC-5

DTSC recommends evaluation, proper investigation and mitigation, if necessary, on on-site area with current or historic PCB-containing transformers.

Response to DTSC-5

As stated in the Phase I Environmental Assessment prepared for the project by Lead Tech Environmental dated January 24, 2017 (included within IS/MND Appendix C.3), the on-site reconnaissance addressed the potential presence of indoor and outdoor transformers that may contain PCBs. No evidence of transformers was observed on the project site.

Comment DTSC-6

The ND states, "A soil management plan shall be implemented for the subject property prior to site redevelopment activities to address any possible residual soil contamination from the former on-site gasoline underground storage tank, piping, and pump dispenser historically located at 2115 North Main Street."

Response to DTSC-6

Comment noted.

Comment DTSC-7

Indicate the name of the regulatory agency, which oversaw the underground storage tank (UST) closure.

Response to DTSC-7

As discussed in the Response to DTSC-2, above, the City of Santa Ana Fire Department provided oversight of the UST removal and closure.

Comment DTSC-8

Indicate whether the UST resulted in soil or groundwater contamination. If soil/groundwater is impacted, then evaluate potential vapor intrusion on-site associated with soil/groundwater contamination.

Response to DTSC-8

According to the Phase I Environmental Assessment prepared for the project by Lead Tech Environmental dated January 24, 2017 (included within IS/MND Appendix C.3), Fuelcom Systems, Inc. collected a total of four soil samples, including two soil samples from the northern and southern sides of the UST pit, under the pump dispenser, and the soil pile from the UST pit. The soil samples were submitted to Associated Laboratories and tested for gasoline (EPA Method 8015), BTEX (EPA Method 8020) and lead (DOHS LUFT). All laboratory results were reported as non-detect (ND). Accordingly, there is no vapor intrusion risk.

Comment DTSC-9

DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequately addressed due to lack of relevant detailed information in the ND.

Response to DTSC-9

Please see Response DTSC-8.

Comment DTSC-10

DTSC recommends soil gas sampling and vapor intrusion risk evaluation on sites with releases of volatile organic compounds (VOCs). DTSC recommends soil gas sampling after removal action to confirm no residual VOC contamination remain on-site and/or risk is acceptable based on applicable and relevant state guidelines.

Response to DTSC-10

Please see Response DTSC-8. Based on the findings and conclusions of the Phase I Environmental Assessment prepared for the project, no further removal or soil gas sampling is warranted.

Comment DTSC-11

The ND states, "The project site is surrounded by the I-5 Freeway (east and north), as well as North Main Street and residential uses (west and south)." Aerially deposited lead (ADL) is generally encountered in unpaved or formerly unpaved areas adjoining older roads, primarily as a result of deposition from historical vehicle emissions when gasoline contained lead. As the project site is adjacent to I-15 Freeway, this issue should be addressed in accordance with all applicable and relevant laws and regulations.

Response to DTSC-11

Comment noted. Based on the findings and conclusions of the Phase I Environmental Assessment prepared for the project, no further assessment of this issue is warranted.

Comment DTSC-12

If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination.

Response to DTSC-12

Comment noted.

Comment DTSC-13

If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the ND should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

Response to DTSC-13

As stated in the Hazards section of the IS/MND, the Phase I Environmental Site Assessment completed for the site found that mitigation measures for potentially contaminated soil, asbestos-containing material, and lead-based paint will be required, as outlined in MM HAZ-1 through MM HAZ-4.

Letter from Alston & Bird, dated December 7, 2017**Comment ALSTON-1-1**

This comment states that the law firm or Alston & Bird represents the owner and operator of Hollybrook Senior Living of Orange. The comment continues to provide background information and general opposition to the project.

Response to ALSTON-1-1

Comment noted.

Comment ALSTON-1-2

The comment cites CEQA guidelines and case law regarding the preparation of an EIR.

Response to ALSTON-1-2

Comment noted. The IS/MND complies with the requirements of CEQA.

Comment ALSTON-1-3

This comment continues to cite CEQA guidelines regarding the fair argument test that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect.

Response to ALSTON-1-3

Comment noted. The IS/MND found that any potentially significant impacts could be mitigated to a less than significant level, and complies with the requirements of CEQA.

Comment ALSTON-1-4

The commenter states the MND provides no analysis of the impacts associated with parking attributable to conversion of the project site a hotel.

Response to ALSTON-1-4

Please see updated Shared Parking Analysis prepared for the variance application requesting a reduction in required off-street parking for the proposed project. This study was prepared for the variance request for the Planning Commission's consideration and not for CEQA purposes. The Shared Parking Analysis is not included as part of the IS/MND. Based on the analysis, the proposed project is forecast to provide adequate parking capacity to serve the proposed project.

The traffic study accounts for the vehicles continuing to park in the project site vicinity.

The study adds the hotel trip generation on top of existing traffic volumes. The analysis does not assume that the traffic associated with the vehicles parking in this area will be reduced or eliminated, although some of the existing users might potentially discontinue parking in this area after replacement of the existing public parking.

Hence, the traffic analysis and evaluated impacts are considered adequate, if not conservative. Prior to preparation of the study, the methodology and approach for the study was developed through close discussions with City staff to ensure that the project is adequately evaluated. This is also the case for the shared parking analysis prepared for the project.

Also, since the project site abuts State Highway facilities and freeway access locations, the prepared study has been reviewed by various agencies including the State of California Department of Transportation (Caltrans), County of Orange, and City of Irvine. All agencies have found the impact analysis adequate and acceptable.

Comment ALSTON-1-5

The commenter states that they object to the parking variance sought by the applicant.

Response to ALSTON-1-5

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Comment ALSTON-1-6

The commenter believes the project must provide 178 parking spaces.

Response to ALSTON-1-6

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Comment ALSTON-1-7

This comment states that the City's Municipal Code has specific criteria that must be met to obtain the requested variance. The commenter states that the application only provided a single sentence response and no detailed analysis of how the project meets the criteria for the variance.

Response to ALSTON1-7

See Response to ALSTON-1-4. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project, and whether the requisite findings can be made.

Comment ALSTON-1-8

The commenter concludes that the project should not be approved unless adequate parking is provided for both the community and the project.

Response to ALSTON-1-8

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Letter from Alston & Bird, dated December 11, 2017

Comment ALSTON-2-1

The commenter states that this is a follow-up to their letter dated December 7, 2017 as they have additional concerns regarding parking variance and traffic related impacts.

Response to ALSTON-2-1

Comment noted. These additional concerns are addressed in the Responses to ALSTON-2-2 to ALSTON-2-7, below.

Comment ALSTON-2-2

The required number of parking spaces is different in each report. The staff report states 166 parking spaces are required and the Shared Parking Analysis states the Hotel Project needs 194 parking spaces.

Response to ALSTON-2-2

The Shared Parking Analysis and staff report have been updated. The Shared Parking Analysis was prepared for the variance application and is not included as part of the IS/MND. Please see updated Shared Parking Analysis.

Comment ALSTON-2-3

The Urban Land Institute (“ULI”) Shared Parking Analysis is generally used for large mixed-use or for shopping center projects proposed on several acres of land. What is the basis for using ULI methodology to analyze parking for a small hotel and restaurant project?

Response to ALSTON-2-3

The Shared Parking Analysis was prepared for the variance application and is not included as part of the IS/MND.

Comment ALSTON-2-4

This comment states that the square footage of the project is inconsistent in Parking Analysis and staff report. The commenter would like to know what is the result of the Shared Parking Analysis using the correct project description and including public parking as a land use.

Response to ALSTON-2-4

Please see updated Shared Parking Analysis that was prepared for the variance application.

Comment ALSTON-2-5

The number of employees projected in the Parking Analysis appears low based on three different businesses proposed to operate on-site.

Response to ALSTON-2-5

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project, and whether the requisite findings can be made.

Comment ALSTON-2-6

This comment states that the Parking Study did not analyze the existing 93 public parking spaces that will be removed as a result of the project, and that the 46 existing parking spaces in the staff report is not an adequate solution for replacing the 93 spaces.

Response to ALSTON-2-6

The Shared Parking Analysis was prepared for the variance application for the hotel project. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project, and whether the requisite findings can be made.

Comment ALSTON-2-7

The commenter states that the removal of the 93 parking spaces without a 1:1 replacement and granting a variance is a significant issue and an EIR should be prepared.

Response to ALSTON-2-7

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project. An MND has been determined to be the appropriate level of CEQA documentation for this project.

Letter from City of Irvine Community Development Dated December 11, 2017

Comment IRVINE-1

The commenter states that they have reviewed the Mitigated Negative Declaration and have no comments.

Response to IRVINE-1

Comment noted.

Letter from County of Orange Public Works Dated December 11, 2017

Comment ORANGE-1

The commenter states that they have reviewed the Notice of Intent to Adopt a Mitigated Negative Declaration for the project and have no comments. They request to be kept on the distribution list for future notifications related to the project.

Response to ORANGE-1

Comment noted.

Letter from Orange County Transportation Authority Dated December 11, 2017

Comment OCTA-1

Please revise text on page 101, Section 16 ('Transportation/Traffic'), Subsection F to include Routes 53 and 83 as serving the Main-Buffalo bus stop.

Response to OCTA-1

Comment noted. Routes 53 and 83 are already included in the text on page 101, Section 16 ('Transportation/Traffic'), Subsection F.

Comment OCTA-2

OCTA currently provides bus service and has a bus stop located near the project, specifically on northbound nearside Main St. at Buffalo Ave. OCTA recommends employing measures to reduce potential disruptions to the bus stop, in effect reducing transit service disruptions, and request the City of Santa Ana (City) to keep OCTA updated with any potential bus stop disruptions or street closures that may necessitate detours.

Response to OCTA-2

Comment noted. The Traffic Impact Study has been updated to include this recommendation.

A bus stop currently exists on the project site frontage on Main Street and will continue to be provided after implementation of the proposed project.

Comment OCTA-3

Please revise text on page 101, Section 16 ('Transportation/Traffic'), Subsection F from "Orange County Transit Authority" to "Orange County Transportation Authority."

Response to OCTA-3

Comment noted. FCS recommends the following text revision:

The Orange County ~~Transit~~ Transportation Authority (OCTA) currently provides public transit services within the City of Santa Ana.

Comment OCTA-4

Appendix D ('Traffic Impact Study'), Chapter 2.0 ('Area Conditions'):

On page 2-2, Section E. ('Public Transit Service'), OCTA considers a project site to be served by bus routes where the project site is within a ½ mile radius from the bus route. Accordingly, nearby routes include Routes 53/X, 60, 83, 453, and 560.

Response to OCTA-4

Comment noted. The Traffic Impact Study has been updated accordingly.

A bus stop currently exists on the project site frontage on Main Street and will continue to be provided after implementation of the proposed project.

Comment OCTA-5

Appendix D ('Traffic Impact Study'), Chapter 2.0 ('Area Conditions'):

Regarding Exhibit 2-6 ('OCTA System Map—North County'), please provide the service change date associated with the map provided.

Response to OCTA-5

Comment noted. The provided System Map of North County is based on the latest information available for access through OCTA website at time of preparation of this study. The Traffic Impact Study has been updated accordingly.

Comment OCTA-6

Appendix D ('Traffic Impact Study'), Chapter 2.0 ('Area Conditions'):

Please note that Main Street is currently a major arterial highway that is planned for six lanes per its Master Plan of Arterial Highways (MPAH) classification. The proposed project should consider the planned buildout of Main Street, as it relates to potential future right-of-way needs. If there is a desire to amend the MPAH, please contact OCTA staff.

Response to OCTA-6

Comment noted. The Traffic Impact Study Section B.2 on page 7-3 makes recommendations pertaining to this issue and ultimate buildout of the roadway half-section.

Comment OCTA-7

Appendix D ('Traffic Impact Study'), Chapter 2.0 ('Area Conditions'):

In coordination with OCTA, the City has proposed a general plan amendment that would reclassify 17th Street from a major arterial to a primary arterial, among other reclassifications. Please be cognizant of the impacts that these proposed general plan changes could potentially have on the project should the general plan update be approved.

Response to OCTA-7

Comment noted. Assumptions regarding future roadway and circulation modifications were discussed and reviewed by City staff prior to preparation of the study. The analysis utilizes existing roadway configurations.

Letter from Department of Transportation District 12 Dated December 12, 2017

Comment DOT-1

The commenter recommends including rideshare/vanpooling opportunities for employees and patrons.

Response to DOT-1

Comment noted. The Traffic Impact Study has been updated to include this recommendation.

Comment DOT-2

There is an Orange County Transportation Authority bus route that serves the Santa Ana Main Street Corridor. This route has a stop in close proximity to the development. Please inform patrons of transit opportunities to local destinations.

Response to DOT-2

Comment noted. The Traffic Impact Study has been updated to include this recommendation.

Comment DOT-3

The commenter suggests that sufficient storage capacity at on and off-ramps should be verified to ensure vehicles do not queue onto freeways. For locations adding traffic to Caltrans intersections, please provide sufficient storage for 95th percentile queue lengths at intersections.

Response to DOT-3

Comment noted. The Traffic Impact Study has been updated to include the requested vehicular queueing evaluation. The City of Santa Ana and Caltrans do not have established and adopted performance criteria and significant impact thresholds for vehicular queuing. Hence, the vehicular queuing analysis presented in this report is strictly for informational purposes and is not related to CEQA analysis or requirements. The conclusions of the IS/MND remain unchanged.

Comment DOT-4

For work within Caltrans Right-of-Way (ROW), a Transportation Management plan is necessary to prevent disruption to Caltrans facilities.

Response to DOT-4

Comment noted. The project does not propose any work within Caltrans ROW.

Comment DOT-5

Any project work proposed in the vicinity of the State ROW will require an Encroachment Permit and all environmental concerns must be adequately addressed. If the environmental document for the project does not meet Caltrans' requirements for work done within State ROW, additional documentation will be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific detail for Encroachment Permits procedure, please refer to the Caltrans' Encroachment Permits Manual at: <http://www.dot.ca.gov/hq/traffops/developerserv/permits/>.

Response to DOT-5

Comment noted. It is not anticipated that the project will involve any work within Caltrans ROW or in close enough proximity that an Encroachment Permit would be required. However, the applicant will be made aware of this requirement and will comply with the Encroachment Permit requirements if applicable.

Comment DOT-6

Please note that additional comments may be forthcoming.

Response to DOT-6

Comment noted.

**Attachment A:
Comment Letters**



Department of Toxic Substances Control



Matthew Rodriguez
Secretary for
Environmental Protection

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

December 6, 2017

Ms. Selena Kelaher, AICP
Associate Planner
City of Santa Ana
20 Civic Center Plaza
Santa Ana, California 92702
skelaher@santa-ana.org

INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION (ND) FOR THE 2129 N. MAIN STREET HAMPTON PROJECT (SCH# 2017111048)

Dear Ms. Kelaher:

The Department of Toxic Substances Control (DTSC) has reviewed the subject ND. The following project description is stated in the ND: "The proposed project consists of removing the existing surface parking lot, an office building (2119 North Main Street), a single-family dwelling (2058 North Bush Street) and three accessory structures. A two-story historical building (2115 North Main Street) will remain in place for conversion to a restaurant, and a one-story historical building (2056 North Bush Street) will be relocated from Bush Street to Main Street within the project site for conversion to an establishment selling alcoholic beverages. The City alley will be realigned with egress onto Main Street and a portion will be vacated."

Based on the review of the submitted document DTSC has the following comments:

1. The ND should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions. 1
2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction. 2

3. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB). | 3
4. If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides. | 4
5. DTSC recommends evaluation, proper investigation and mitigation, if necessary, on onsite areas with current or historic PCB-containing transformers. | 5
6. The ND states, "A soil management plan shall be implemented for the subject property prior to site redevelopment activities to address any possible residual soil contamination from the former on-site gasoline underground storage tank, piping, and pump dispenser historically located at 2115 North Main Street." | 6
 - a. Indicate the name of the regulatory agency, which oversaw the underground storage tank (UST) closure. | 7
 - b. Indicate whether the UST resulted in soil or groundwater contamination. If soil/groundwater is impacted, then evaluate potential vapor intrusion onsite associated with soil/groundwater contamination. | 8
 - c. DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequately addressed due to lack of relevant detailed information in the ND | 9
 - d. DTSC recommends soil gas sampling and vapor intrusion risk evaluation on sites with releases of volatile organic compounds (VOCs). DTSC recommends soil gas sampling after removal action to confirm no residual VOC contamination remain onsite and/or risk is acceptable based on applicable and relevant state guidelines. | 10
7. The ND states, "The project site is surrounded by the I-5 Freeway (east and north), as well as North Main Street and residential uses (west and south)." Aerially deposited lead (ADL) is generally encountered in unpaved or formerly unpaved areas adjoining older roads, primarily as a result of deposition from historical vehicle emissions when gasoline contained lead. As the project site is adjacent to I-15 Freeway, this issue should be addressed in accordance with all applicable and relevant laws and regulations. | 11

8. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination.

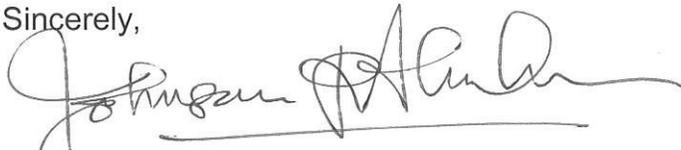
12

9. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the ND should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

13

If you have any questions regarding this letter, please contact me at (714) 484-5380 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,



Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program - Cypress

kl/sh/ja

Ms. Selena Kelaher, AICP
December 6, 2017
Page 4

DTSC
Page 4 of 4

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2017111048

ALSTON & BIRD

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December 7, 2017

Via Email
skelaher@santa-ana.org

Selena Kelaher
City of Santa Ana
Planning Division
P.O. Box 1988
Santa Ana, CA 92701

Re: Proposed Hampton Hotel Project

Dear Ms. Kelaher:

This law firm represents the owner and operator of Hollybrook Senior Living of Orange (“Hollybrook”), located at 2025 North Bush Street, Santa Ana, California. Hollybrook has been an important member of the community since it began its operations in 1969. We write this letter to express our concerns about the parking and traffic related impacts that would be caused by the proposed Hampton Hotel Project (“Hotel Project”), particularly since Hollybrook is located less than one quarter of a mile away from the Project site. Currently, the Project site is used by members of the community for parking given the deficiencies in the amount of parking provided in this area of the City.

1

We first address the adequacy of the Mitigated Negative Declaration (“MND”) prepared for the Hotel Project. Case law is clear that courts generally apply the “fair argument” test to review an agency’s decision to use a negative declaration under the California Environmental Quality Act (“CEQA”). (*Rominger v. County of Colusa* (2014) 229 Cal.App.4th 690, 713.) CEQA requires a lead agency to prepare an EIR for any project that “may have a significant effect on the environment.” (Pub. Resources Code, § 21151; *Friends of “B” Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 999.) If an initial study reveals that a project may have a significant effect on the environment, an EIR must be prepared. (*Friends of “B” Street, supra*, 106 Cal.App.3d at p. 1000.) Courts have routinely held that an EIR must be prepared “whenever it can be fairly argued on the basis of substantial evidence that the project may have significant environmental impact.” (*Id.* at p. 1001.)

2

Since a “negative declaration ends environmental review, the fair argument test provides a low threshold for requiring an EIR.” (*Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 399; *County Sanitation District No. 2 of Los Angeles County v. County of Kern* (2005) 127 Cal.App.4th 1544, 1579.) If the record supports a fair argument that a project will result in significant environmental impacts, the required remedy is to order preparation of an EIR. (*Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 319-20.) Under this standard, “deference to the agency’s determination is not appropriate and its decision not to require an EIR can be upheld only when there is no credible evidence to the contrary.” (*Id.* [emphasis added]; see also *Rominger, supra*, 229 Cal.App.4th at p. 713.) The CEQA Guidelines require that if a lead agency is “presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect.” (CEQA Guideline 15064(f)(1); *No Oil, Inc. v. City of Los Angeles* (1975) 13 Cal.3d 68, 75.)

3

The MND provides no analysis of the environmental impacts associated with the loss of parking attributable to conversion of the Project site to a hotel. While parking is not considered a *direct* environmental impact under CEQA, CEQA requires that *indirect* and *secondary* impacts must be analyzed. (Refer to CEQA Guidelines Sections 15064(d)(2), 15358(a)(2).) The loss of parking, combined with the inadequate amount of parking that the Hotel Project would provide (see below), will cause significant indirect and secondary traffic impacts associated with motorists driving on local streets looking for parking spaces. Neither the MND nor the traffic reports attached to the MND discuss or even mention that potential significant traffic impact.

4

We also object to the proposed parking variance sought by the applicant of the Hotel Project. During the City Council hearing held on May 2, 2017, for the purchase and sale of the subject property, Hassan Haghani, Executive Director Planning and Building, stated that the proposed concept plan for the Hotel Project proposes to meet all “required” parking on site. At the request of Councilman Jose Solorio, the item was continued to May 16, 2017 and staff was directed to report back on the availability of other public parking options in close proximity to the existing parking lot. Yet no report with a solution has been provided to the community.

5

The proposed 135-room hotel requires one parking space per guest room plus one space for every 10 guest rooms for a total of 149 spaces. The proposed 2,627 square-foot restaurant requires 21 parking spaces and the proposed 922 square-foot bar requires 8 spaces. Thus, the Applicant must provide 178 parking spaces. Instead of providing those 178 required parking spaces, the applicant for the Hotel Project seeks a variance to provide only 128 spaces, which would be a 30% reduction from the required number of parking spaces. In reviewing the file for the application for the Hotel Project, it appears that the applicant has provided no parking demand or other study to justify such a substantial reduction in the number of required parking spaces.

6

Selena Kelaher
December 7, 2017
Page 3

Further, the City's Municipal Code provides very specific criteria that the applicant must meet to obtain the requested variance, including that there are "special circumstances" concerning the subject property; the variance is necessary to preserve a substantial property right; and the variance will not be detrimental to the public welfare or injurious to the surrounding properties. Yet, the application only provides one-sentence responses to those required findings, with no detailed analysis of how the Hotel Project meets the criteria for a variance. To that end, the application provides no analysis of alternative configurations to the on-site parking proposed by the applicant for the Hotel Project.

7

Given the community's concerns about parking in this area, as raised at the March 9, 2017, Sunshine Community Meeting and the May 2nd meeting of the City Council, we believe that the Hotel Project should not be approved unless and until adequate parking is provided both for the community and the Hotel Project.

8

Very truly yours,



Edward J. Casey

EJC/ysr

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December 11, 2017

Via Email

Selena Kelaher
City of Santa Anna
Planning Division
20 Civic Center Plaza
P.O. Box 1988
Santa Ana, CA 92701

Re: Proposed Hampton Hotel Project

Dear Ms. Kelaher:

Following up on our letter dated December 7, 2017, on behalf of the owner and operator of Hollybrook Senior Living of Orange (“Hollybrook”) we have additional concerns about the parking variance and traffic related impacts that would be caused by the proposed Hampton Hotel Project (“Hotel Project”). Even though a copy of the Shared Parking Analysis was not in the Project file during our review on December 5, 2017, we have now reviewed the staff report and the parking analysis. In review of these documents we note following inconsistencies within the reports:

- The required number of parking spaces is different in each report. The staff reports states 166 parking spaces are required and the Shared Parking Analysis states the Hotel Project needs 194 parking spaces.
- The Urban Land Institute (“ULI”) Shared Parking Analysis is generally used for large mixed-use or for shopping center projects proposed on several acres of land. What is the basis for using ULI methodology to analyze parking for small hotel and restaurant project?
- The applicant proposes a 135 room hotel and to convert the onsite historic structures into a 2,627 square foot restaurant and the other into a 922 square foot restaurant that will not be operated by the hotel. Yet the Parking Analysis assumes a smaller hotel, 1,027 square feet, with the restaurant and bar areas within the hotel building. The staff report notes that the applicant proposes to offer parking for the hotel guest, restaurant patrons and to the public for a paid price. What is the result of the Shared Parking Analysis using the correct project description and including public parking as a land use?

Selena Kelaher
December 11, 2017
Page 2

- The number of employees projected in the Parking Analysis appears to be low based on three different businesses proposed to operate onsite. | 5
- The Parking Study analyzes the parking demand for the hotel, however there is no mention of the existing 93 public parking spaces that will be removed as a result of this Project. The staff reports provides information on 46 existing parking spaces in the area, some of which have time restrictions and therefore is not an adequate solution for replacing all 93 spaces. | 6

The removal of 93 parking spaces without a 1:1 replacement and granting a variance to allow reduced onsite parking for the Hotel Project is a significant issue for Hollybrook and the community and an Environmental Impact Report (“EIR”) should be prepared. We therefore request that the City Planning Commission continue consideration of the Hotel project to allow staff the necessary time to prepare an EIR and to find an adequate parking solution that satisfies the entire community. | 7

Very truly yours,



Edward J. Casey

EJC/ysr



December 11, 2017

Ms. Selena Kelaher
City of Santa Ana
20 Civic Center Plaza
Santa Ana, CA 92701

Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for the Hampton Inn Hotel

Dear Ms. Kelaher:

Thank you for the opportunity to review the Mitigated Negative Declaration for the Hampton Inn Hotel project located at 2129 North Main Street in the City of Santa Ana. The proposed project consists of a six-story hotel with 135 rooms, a pool, a fitness room and a lobby area. Staff completed its reviewed and has no comments at this time.

If you have any questions, please contact me at 949-724-6364 or by email at jequina@cityofirvine.org.

Sincerely,

Justin Equina
Associate Planner

ec: Kerwin Lau, Manager of Planning Services
Bill Jacobs, Principal Planner



December 11, 2017

NCL-2017-067

Selena Kelaher
City of Santa Ana Planning Division
20 Civic Center Plaza
Santa Ana, CA 92701

Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for the Hampton Inn Hotel Project

Dear Ms. Kelaher:

The County of Orange has reviewed the Notice of Intent to Adopt a Mitigated Negative Declaration for the Hampton Inn Hotel Project and has no comments at this time. We would like to be advised of any further developments on the project. Please continue to keep us on the distribution list for future notifications related to the project.

1

If you have any questions, please contact Ashley Brodtkin in Development Services at (714) 667-8854.

Sincerely,

Richard Vuong, Manager, Planning Division
OC Public Works Service Area/OC Development Services
300 North Flower Street
Santa Ana, California 92702-4048
Richard.Vuong@ocpw.ocgov.com



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Chief Executive Officer

December 11, 2017

Ms. Selena Kelaher
Planning Division
City of Santa Ana
20 Civic Center Plaza (P.O. Box 1988)
Santa Ana, CA 92701

Subject: **2129 North Main Street Hampton Hotel Project Initial Study/Mitigated Negative Declaration (IS/MND)**

Dear Ms. Kelaher:

Thank you for providing the Orange County Transportation Authority (OCTA) with the IS/MND for the 2129 North Main Street Hampton Hotel Project (Project). The following comments are provided for your consideration:

- Page 101, Section 16 ('Transportation/Traffic'), Subsection F:
 - Please revise text to include Routes 53 and 83 as serving the Main-Buffalo bus stop. | 1
 - OCTA currently provides bus service and has a bus stop located near the Project, specifically on northbound nearside Main St. at Buffalo Ave. OCTA recommends employing measures to reduce potential disruptions to the bus stop, in effect reducing transit service disruptions, and requests the City of Santa Ana (City) to keep OCTA updated with any potential bus stop disruptions or street closures that may necessitate detours. | 2
 - Please revise text from "Orange County Transit Authority" to "Orange County Transportation Authority". | 3
- Appendix D ('Traffic Impact Study'), Chapter 2.0 ('Area Conditions'):
 - One page 2-2, Section E. ('Public Transit Service'), OCTA considers a project site to be served by bus routes where the project site is within a 1/2 mile radius from the bus route. Accordingly, nearby routes include Routes 53/X, 60, 83, 453, and 560. | 4
 - Regarding Exhibit 2-6 ('OCTA System Map – North County'), please provide the service change date associated with the map provided. | 5

- Please note that Main Street is currently a major arterial highway that is planned for six lanes per its Master Plan of Arterial Highways (MPAH) classification. The proposed Project should consider the planned buildout of Main Street, as it relates to potential future right-of-way needs. If there is a desire to amend the MPAH, please contact OCTA staff. 6
- In coordination with OCTA, the City has proposed a general plan amendment that would reclassify 17th Street from a major arterial to a primary arterial, among other reclassifications. Please be cognizant of the impacts that these proposed general plan changes could potentially have on the Project should the general plan update be approved. 7

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,



Dan Phu
Manager, Environmental Programs

DEPARTMENT OF TRANSPORTATION**DISTRICT 12**

1750 EAST FOURTH STREET, SUITE 100

SANTA ANA, CA 92705

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*Making Conservation
a California Way of Life.*

DOT
Page 1 of 2

December 12, 2017

Ms. Selena Kehaler
City of Santa Ana
20 Civic Center Plaza
Santa Ana, CA 22702

File: IGR/CEQA
SCH#: 2017111048
12-ORA-2017-00760
I-5 32.924

Dear Ms. Kehaler,

Thank you for involving the California Department of Transportation (Caltrans) in the Mitigated Negative Declaration (MND) for the proposed Main Street Hampton Hotel. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

The project proposes the construction of a 135-room hotel with various amenities including a restaurant and bar. The project is located east of Main Street in the City of Santa Ana and in proximity of Interstate 5 (I-5). Caltrans is a responsible agency and has the following comments:

Transportation Planning

- | | |
|--|---|
| 1. Include rideshare/vanpooling opportunities for employees and patrons. | 1 |
| 2. There is an Orange County Transportation Authority bus route that serves the Santa Ana Main Street Corridor. This route has a stop in close proximity to the development. Please inform patrons of transit opportunities to local destinations. | 2 |

Traffic Operations

- | | |
|---|---|
| 3. Verify sufficient storage capacity at on and off-ramps to ensure vehicles do no queue onto freeways. For locations adding traffic to Caltrans intersections, please provide sufficient storage for 95 th percentile queue lengths at intersections. | 3 |
| 4. For work within Caltrans Right-of-Way (ROW) a Transportation Management Plan is necessary to prevent disruption to Caltrans facilities. | 4 |

Encroachment Permit

- | | |
|---|---|
| 5. Any project work proposed in the vicinity of the State ROW will require an Encroachment Permit and all environmental concerns must be adequately addressed. If the environmental document for the project does not meet Caltrans' requirements for work done within State ROW, additional documentation will be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific details for Encroachment Permits | 5 |
|---|---|

procedure, please refer to the Caltrans' Encroachment Permits Manual at:
<http://www.dot.ca.gov/hq/traffops/developserv/permits/>

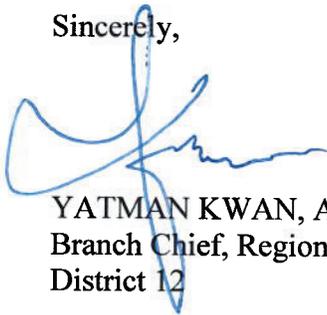
Other

6. Please note that additional comments may be forthcoming.

6

Please continue to coordinate with Caltrans for any future developments that could potentially impact State Highway System. If you have any questions, please do not hesitate to contact Jude Miranda at (657) 329-6227 or Jude.Miranda@dot.ca.gov.

Sincerely,



YATMAN KWAN, AICP
Branch Chief, Regional-IGR-Transit Planning
District 12