

## 2. Introduction

### 2.1 SUPPLEMENTAL EIR INTRODUCTION

This Draft Environmental Impact Report (EIR) has been prepared as a Supplemental EIR to the City of Santa Ana's General Plan Update Final Environmental Impact Report (GPU FEIR), State Clearinghouse (SCH) No. 2020029087, that was certified by the City on April 19, 2022.

This Draft Supplemental EIR evaluates the environmental effects that may result from the construction and operation of the proposed Project. This EIR has been prepared by the City of Santa Ana in its capacity as Lead Agency, as that term is defined in Section 15367 of the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.) and in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). This EIR has been prepared to identify, analyze, and mitigate the significant environmental effects of the proposed Project.

CEQA requires each EIR to reflect the independent judgment of the Lead Agency, including but not limited to the thresholds of significance used to analyze Project impacts, analyses and conclusions regarding the level of significance of impacts both before and after mitigation, the identification and application of mitigation measures to avoid or reduce Project-related impacts, and the consideration of alternatives to the proposed Project. In preparing this EIR, the City of Santa Ana has employed CEQA and environmental technical specialists; however, the analyses and conclusions set forth in this EIR reflect the independent judgment of the City as Lead Agency.

### 2.2 ENVIRONMENTAL BACKGROUND

The City of Santa Ana (City) General Plan Update (GPU) was adopted, and the GPU FEIR certified, in April 2022 and went into effect on May 26, 2022. The GPU provides long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the Santa Ana community through 2045, and provides comprehensive land use, housing, circulation and infrastructure, public service, resource conservation and public safety policies for the entire City. The GPU Land Use Element guides growth and development (e.g., infill development, redevelopment, use and revitalization/restoration) by designating land uses.

A project is consistent with the GPU if the development density does not exceed what was contemplated and analyzed for the parcel(s) in the certified GPU FEIR and complies with the associated standards applicable to that development density (State CEQA Guidelines Section 15183(i)(2)). Development density standards can include the number of dwelling units per acre, the number of people in a given area, floor area ratio (FAR), and other measures of building intensity, building height, size limitations, and use restrictions.

As identified in the GPU, the Project site is located within the South Bristol Street Focus Area and has a GPU designation of District Center-High (DC-5), which has a maximum FAR of 5.0 or 125 dwelling units per acre (du/ac) and a maximum height of 25 stories that allows up to 8,733,780 square feet (SF) of mixed uses, inclusive of residential uses, within the Project site. This level of redevelopment was included in the GPU FEIR buildout, and applicable mitigation measures were identified, as necessary, to reduce impacts.

Table 1-5 of the GPU FEIR provides a list of the impacts that would result from construction and operation of buildout of the GPU, which include the following:

**Significant and Unavoidable Impact:** The GPU FEIR identified significant and unavoidable impacts in the following environmental topic areas:

- Air Quality

- Cultural Resources
- Greenhouse Gas Emissions
- Noise
- Population and Housing
- Recreation

Less Than Significant Impact with Incorporation of Mitigation: The GPU FEIR identified impacts that could be mitigated to less than significant levels with incorporation of mitigation measures in the following environmental topic areas:

- Geology and Soils
- Tribal Cultural Resources

Less Than Significant Impact: The GPU FEIR identified less than significant impacts in the following environmental topic areas:

- Aesthetics
- Biological Resources
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Public Services
- Transportation
- Utilities and Service Systems

No Impact: The GPU FEIR determined that no impact would occur with respect to the following environmental topic areas below.

- Agricultural and Forestry Resources
- Wildfire

## 2.3 PURPOSE OF AN EIR

CEQA requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. Pursuant to the provisions of CEQA Guidelines Section 15121(a), this EIR is intended as an informational document to inform public agency decision makers and the general public of the significant environmental effects of the proposed Project, identify possible ways to avoid or minimize those significant effects, and describe reasonable alternatives to the proposed Project that might avoid or lessen significant environmental effects. Thus, this EIR is intended to aid the review and decision-making process.

The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision makers and the public of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (CEQA Guidelines Section 15121(a)).

- Standards for Adequacy of an EIR. An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency's decision-making process.

### ***Basis for a Supplemental EIR***

The GPU FEIR is a Program EIR that examined the existing environment and the total scope of environmental effects that would occur as a result of buildout of the GPU land uses. Once a Program EIR has been prepared, subsequent activities within the program or changes to the program must be evaluated to determine whether additional CEQA documentation needs to be prepared.

The key considerations in determining the need for additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and CEQA Guidelines Section 15162, which states that no subsequent EIR shall be prepared unless one or more of the following conditions is present:

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

Also, CEQA Guidelines Section 15163 states that the Lead Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

- (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
- (2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

As detailed in Chapter 3.0, *Project Description*, the proposed Project includes a phased redevelopment of the Project site, consistent with the General Plan District Center-High (DC-5) land use designation and the South Bristol Street Focus Area. The proposed Project includes a phased removal of the existing site buildings and development and operation of up to 3,750 multi-family residential units in multi-story structures, 350,000 SF of commercial uses, a 250-room hotel, a 200-unit senior living facility, parking structures, and 13 acres of common open space.

This proposed Project may involve new significant environmental effects or a substantial increase in the previously identified effects. Thus, the City of Santa Ana has prepared this Supplemental EIR that evaluates the potential of the proposed Project to result in new or substantially greater impacts than previously identified in the GPU FEIR, pursuant to the requirements of CEQA, as detailed below.

### ***Program EIR and Project EIR CEQA Coverage***

A Program EIR is an EIR prepared to assess a series of actions characterized as one project. The actions can be related to one another: geographically; because they are part of a chain of contemplated actions; because they are governed by the same rules, regulations, plans, or other general criteria associated with a program; or because they are individual activities carried out under the same statutory or regulatory authorities and have similar environmental effects and mitigation needs. The GPU FEIR is the Program EIR that examined the buildout of the City's land use plan, which was certified in 2022.

A Project EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. This Draft Supplemental EIR fulfills the requirements for a Project EIR and examines the proposed Project for which development applications are currently on file with the City.

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide public information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency's decision-making process.

## **2.4 SUPPLEMENTAL EIR SCOPE AND CONTENT**

### ***Environmental Setting and Baseline***

The environmental setting is normally existing conditions at the time the CEQA analysis begins (CEQA Guidelines Section 15125). In most cases, this forms the baseline that the impact analysis will use as its starting point. However, when the project is within the scope of a Program EIR (such as the GPU FEIR), the effective baseline is the previously approved and analyzed project for which the Program EIR was certified (*Sierra Club v. City of Orange* [2008] 163 Cal.App.4th 523). Here, the previous project is the GPU; the EIR for which commenced in February 2020 with the preparation of the Notice of Preparation (NOP).

CEQA Guidelines and case law recognize that the date for establishing an environmental baseline cannot be rigid (see CEQA Guidelines Sections 15146, 15151, and 15204). The intent of this Supplemental EIR is to provide a reasonably conservative analysis that identifies the reasonable maximum potential impact. Thus, this Supplemental EIR provides both baseline conditions from the GPU FEIR (and thus 2020) and current conditions, such as the most recent available air quality monitoring data for 2021 ambient air conditions

provided in Section 5.1, *Air Quality*, the noise measurements identified in Section, 5.9, *Noise*, and existing traffic conditions identified in Section 5.13, *Transportation*.

### **Impacts Found to Be Potentially Significant**

The City has determined that a Supplemental EIR should be prepared for the proposed Project. As a result, a NOP was prepared and circulated between March 17, 2023 and April 17, 2023 for the required 30-day review period. The purpose of the NOP was to solicit early comments from public agencies with expertise in subjects that are discussed in this Draft EIR. The NOP and written responses to the NOP are contained in Appendix A of this Draft Supplemental EIR. The City of Santa Ana also held a scoping meeting for the proposed Project to solicit oral and written comments from the public and public agencies. The public scoping meeting was held on March 30, 2023. Comments received at the meeting are contained in Appendix A of this EIR. Topics requiring a detailed level of analysis evaluated in this EIR have been identified based upon the responses to both the NOP and a review of the proposed Project by the City of Santa Ana. The City determined through the initial review process that impacts related to the following topics are potentially significant and required a detailed level of analysis in this Supplemental EIR:

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Parks and Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

**Impacts Found Not to Be Significant.** CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment”. Topics that have been determined not to be significant and are therefore not discussed in detail in the Supplemental EIR were identified based upon the responses to the NOP and a review of the proposed Project by the City of Santa Ana. The City determined through the initial review process that impacts related to the following topics are not potentially significant and are not required to be evaluated in this EIR:

- Aesthetics
- Agriculture and Forest Resources
- Biological Resources
- Mineral Resources
- Wildfire

## **2.5 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES**

The CEQA Guidelines define lead, responsible, and trustee agencies. The City of Santa Ana is the Lead Agency for the proposed Project because it holds principal responsibility for approving the proposed Project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval authority over the proposed Project. Federal, state, regional, and/or local government permits may be required for the proposed Project, whether or not they are explicitly listed below. The following responsible agencies, including federal, state, and regional agencies that may have jurisdiction over some aspects include (but are not limited to):

- Federal Aviation Administration (FAA)
- Airport Land Use Commission (ALUC) for Orange County
- Department of Toxic Substances Control (DTSC)

- South Coast Air Quality Management District (SCAQMD)
- Santa Ana Regional Water Quality Control Board (RWQCB)
- City of Costa Mesa
- Orange County Transportation Authority (OCTA)

Trustee agencies have jurisdiction over certain resources held in trust for the people of California but do not have legal authority over approving or carrying out the project. CEQA Guidelines Section 15386 designates four agencies as trustee agencies: the California Department of Fish and Wildlife with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission, with regard to state-owned “sovereign” lands, such as the beds of navigable waters and state school lands; the California Department of Parks and Recreation, with regard to units of the state park system; and, the University of California, with regard to sites within the Natural Land and Water Reserves System. There are no trustee agencies for the proposed Project.

## 2.6 ENVIRONMENTAL REVIEW PROCESS

### Notice of Preparation/Initial Study

Pursuant to the requirements of CEQA, the City of Santa Ana, as Lead Agency, prepared a NOP for the proposed Project, which was distributed on March 17, 2023 for a 30-day public review and comment period that ended on April 17, 2023. The NOP requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the EIR being prepared. Comments received on the NOP are included in Appendix A and summarized in Table 2-1, which also includes a reference to the EIR section(s) in which issues raised in the comment letters are addressed.

**Table 2-1: Summary of NOP/Initial Study Comment Letters**

Comment Letter and Comment	Relevant EIR Section
<b>STATE AGENCIES</b>	
<b>State Native American Heritage Commission, March 14, 2023</b>	
<p>This letter states that compliance with AB 52 applies to any project for which a notice of preparation, notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. In addition, if the project involves the adoption of an amendment to a general plan or a specific plan, or the designation of proposed designation of open space, on or after March 1, 2015, it may also be subject to Senate Bill 18. The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. A brief summary of portions of AB 52 and SB 18, as well as the NAHC’s recommendations for conducting consultation is provided. Examples of mitigation measures that, if feasible, would avoid or minimize significant adverse impacts to tribal cultural resources are also provided.</p>	<p>5.2 Cultural Resources 5.14 Tribal Cultural Resources</p>

Comment Letter and Comment	Relevant EIR Section
<b>REGIONAL AGENCIES</b>	
<b>Southern California Association of Governments, April 6, 2023</b>	
<p>This letter states that Southern California Association of Governments (SCAG) is the designated Regional Transportation Agency and the clearinghouse for regionally significant projects and reviews projects for consistency with local and regional plans. The comment requests that the Supplemental EIR is sent to SCAG for review during the public review period. The letter provides a list of the 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) Goals and Strategies that may be applicable to the proposed Project. In addition, the letter provides the SCAG Regional Growth Forecast data for the SCAG region and the City of Santa Ana. The letter also recommends review of SCAG recommended mitigation measures from the 2020 RTP/SCS Final EIR.</p>	<p>5.8, Land Use and Planning 5.10, Population and Housing 5.13, Transportation</p>
<b>Airport Land Use Commission for Orange County, April 17, 2023</b>	
<p>This letter provides details regarding the Project’s location within the AELUP notification area for John Wayne Airport (SNA) and its location within the Federal Aviation Administration (FAA) Federal Aviation Regulations (FAR) Part 77 Notification Area for SNA. The letter states that the EIR should include height policy language and mitigation measures that state no buildings shall be allowed to penetrate the FAR Part 77 imaginary surfaces for SNA. The letter states that projects exceeding 200 feet above ground level require filing with the FAA and ALUC including filing a Notice of Proposed Construction or Alteration (FAA Form 7460-1). The comment states that the City should include a policy in the Specific Plan or mitigation measure in the EIR which states the City shall refer projects in to ALUC for Orange County. The letter requests that referrals be made after the City’s Planning Commission and before the City Council hearing.</p>	<p>5.6, Hazards and Hazardous Materials 5.8, Land Use and Planning 5.9, Noise</p>
<b>Orange County Sanitation District, April 11, 2023</b>	
<p>This letter states that there are potential capacity issues related to the proposed Project for the Orange County Sanitation District sewer line and requests coordination with the District prior to determining points of connection. The letter also states that the District does not allow parking structure drains to connect to sewer per ordinance. The comment states that City sewers eventually connect to District sewers, which lead to the reclamation plant in Fountain Valley.</p>	<p>5.15, Utilities and Service Systems</p>
<b>South Coast Air Quality Management District, April 18, 2023</b>	
<p>This letter requests that the City of Santa Ana provide the Draft EIR and technical documents, including modeling files, to SCAQMD for review during the public review period. The letter references the SCAQMD’s CEQA Air Quality Handbook and recommends using the methodologies of the Handbook to evaluate impacts of the proposed Project, including use of the CalEEMod model, recommended regional significance thresholds, and localized significance thresholds or dispersion modeling. The letter also recommends comparing overlapping construction and operational emissions to operational thresholds. The letter recommends a mobile health risk assessment related to diesel particulate matter from heavy-duty diesel-fueled vehicles. In addition, it recommends using the adopted Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. The letter also includes multiple recommended mitigation measures from SCAQMD’s Mitigation Monitoring and Reporting Plan for the 2022 AQMP.</p>	<p>5.1, Air Quality 5.5, Greenhouse Gas Emissions</p>
<b>Orange County Transportation Authority, April 17, 2023</b>	
<p>This letter states that there are multiple bus routes serving the proposed Project (55, 57, 76, 86, 150, and Bravo! Route 553) and the site serves as a</p>	<p>5.13, Transportation</p>

Comment Letter and Comment	Relevant EIR Section
<p>critical transfer hub for these routes. The letter states that Orange County Transportation Authority (OCTA) has the potential for future expansion and would appreciate being included in the development of site plans and requests that street improvement plans be provided to OCTA for review. The letter states that the westbound Sunflower Avenue/Bristol Street stop is a major layover location and as part of long-term development plans, this bus stop is proposed to increase the layover zone to 360 feet long. The letter requests the proposed Project consider investing in bike parking and bike connectivity as multimodal solutions should be incorporated into the Project design.</p>	
<b>COUNTY AND CITY AGENCIES</b>	
<b>City of Irvine, April 13, 2023</b>	
<p>This letter provides a summary of the Project Description and states that the City of Irvine is able to find information in the GPU FEIR regarding the Bristol Street Focus Area and requests this information be included in the Draft EIR for the Project. The letter requests the City clarify that the intensity of the development is within what was analyzed by the GPU FEIR and if it is above, the Dyer/SR-55 and Dyer Rd areas should be included in the Project study area to determine if the proposed Project would result in LOS deficiencies that must be mitigated based on City of Irvine criteria. The letter provides information on the City of Irvine’s traffic analysis criteria. The letter requests that the City of Irvine be added to the Project notification distribution list.</p>	<p>3.0, Project Description 5.13, Transportation</p>
<b>City of Costa Mesa, April 17, 2023</b>	
<p>This letter provides a brief summary of the Project Description and states that the proposed Project is directly north of the City of Costa Mesa. This letter requests that the analysis for the proposed Project include both level of service (LOS) and vehicle miles traveled (VMT) and requests that the City consult with Costa Mesa prior to initiation of the Traffic Impact Analysis (TIA). This letter provides direction on which intersections should be analyzed and requests coordination regarding offsite improvements near the City of Costa Mesa. The letter also requests that the EIR discuss the proposed access points, line of sight at driveways, among other applicable circulation issues. The letter requests that the public services analysis identify impacts associated with the provision of coordinated police and fire. In addition, any needed infrastructure improvements should be identified. This letter also requests the aesthetics analysis include visual simulations/line of sight analysis from key vantage points in Costa Mesa and should evaluate the compatibility of proposed building heights with those in the surrounding area.</p>	<p>5.11, Public Services 5.13, Transportation 5.15, Utilities and Service Systems 5.16, Mandatory Findings of Significance</p>
<b>ORGANIZATIONS</b>	
<b>Southwest Mountain States Regional Council of Carpenters, March 29, 2023</b>	
<p>This letter requests that the City provide all notices related to the proposed Project to the group. The letter states that the City should require the use of a local workforce to benefit the local economy and the environment. The comment states that use of local workforce for construction of the proposed Project would reduce GHG emissions and VMT. The letter also suggests the City impose a training program during construction to prevent the spread of COVID-19. The letter includes an attachment letter from Soil Water Air Protection Enterprise (SWAPE), which includes a discussion of GHG and VMT reductions related to local hire.</p>	<p>5.5, Greenhouse Gas Emissions 5.13, Transportation</p>
<b>Earthjustice, March 30, 2023</b>	
<p>This letter discusses that the proposed Project should incorporate building electrification in order to reduce GHG emissions, energy use, and health impacts. The comment states that one way to analyze GHG emissions is to apply a net-zero emissions threshold and provides a discussion of the Bay</p>	<p>5.1, Air Quality 5.3, Energy 5.5, Greenhouse Gas Emissions</p>



Comment Letter and Comment	Relevant EIR Section
<p>Area Air Quality Management District’s new guidance for analyzing GHG impacts. The letter cautions against using a per capita GHG threshold. The letter states that utilizing natural gas should be considered a significant energy impact under CEQA and that natural gas use results in harmful indoor air pollution. The letter further discusses that building electrification is feasible and effective mitigation to reduce Project GHG, energy, and health risk impacts. The letter also request that the City provide all notices related to the proposed Project to the group.</p>	
<p><b>UNITE HERE Local 11, April 17, 2023</b></p>	
<p>This letter states that it was written on behalf of UNITE HERE Local 11 and provides a summary of the Project Description. This comment states that the City should circulate the Draft EIR for a 65 day public review period. The letters states that the EIR should consider the proposed Project’s consistency with GHG and VMT assumptions under the GPU FEIR and discusses that the City has not updated its Climate Action Plan. The letter discusses that the EIR should discuss CARB’s 2022 Scoping Plan, SCAG’s 2024 RTP/SCS, SCAQMD’s 2022 AQMP, and SCAQMD’s updated Air Quality Analysis Guidance Handbook. The letters states that the EIR should consider all feasible mitigation measures and should provide substantial evidence why other mitigation measures are not considered. In addition, the letters states that the EIR should address the loss of urban tree canopies and provide additional measures to minimize tree removal and promote native landscaping. The letter states that the EIR should consider hotel-specific recycling and traffic demand management programs to reduce impacts related to the hotel operation. In addition, the letter states that if significant impacts occur, the City would be required to adopt a statement of overriding considerations. Local 11 requests all notices concerning any CEQA/land use decisions.</p>	<p>5.1, Air Quality 5.5, Greenhouse Gas Emissions 5.13, Transportation 5.15, Utilities and Service Systems 5.16, Mandatory Findings of Significance</p>
<p style="text-align: center;"><b>INDIVIDUALS</b></p>	
<p><b>Pete, March 30, 2023</b></p>	
<p>This comment states that there is a lack of information on potential traffic issues related to the proposed Project. The comment states that if there is information about traffic volumes, patterns, and mitigation it should be provided to the residents.</p>	<p>5.13, Transportation</p>
<p><b>Pete, March 31, 2023</b></p>	
<p>This comment states the proposed Project should include a rooftop garden for residents, an added amenity, hobbies for residents onsite, passive cooling, and to expand outdoor space. The comment states that aesthetics and air quality should be considered.</p>	<p>5.1, Air Quality 5.16, Mandatory Findings</p>
<p><b>Sue Grasse, April 1, 2023</b></p>	
<p>This comment states that utilities should be undergrounded and the proposed Project should use less reflective materials on exterior building elevations. The comment states there will be air quality impacts from dust during construction and increased traffic, as well as noise impacts during construction and operation. The letter states there will be cracks in homes due to proposed Project earthmoving and the site is susceptible to liquefaction and asks how security in parking garages would be handled. The comment raises concerns regarding water use, trash/recycling, alternative transportation, and parking. The letter states that nearby cities should be consulted, as well as fire and police departments. The letter asks what type of recreation would be included, as well ask how many affordable units would be provided. The letter states there should be a community room, grocery store, and onsite preschool provided. The letter also states that the architecture should reflect historic architecture in Santa Ana.</p>	<p>5.1, Air Quality 5.3, Energy 5.4, Geology and Soils 5.7, Hydrology and Water Quality 5.9, Noise 5.11, Public Services 5.12, Parks and Recreation 5.13, Transportation 5.15, Utilities and Service Systems</p>

Comment Letter and Comment	Relevant EIR Section
<b>Pete, April 4, 2023</b>	
This letter states there should be no construction traffic through neighborhoods and mitigation should be provided for traffic impacts prior to or concurrent with construction.	5.13, Transportation
<b>Unnamed</b>	
This comment provides potential mitigation measures for the proposed Project including rainwater capture, installation of solar panels, and wind turbines. This comment states that shade, glare, and shadow impacts should be mitigated through building design. The comment states that the proposed Project should incorporate state of the art trash and recycling services to reduce waste. The letter states there should be dedicated rideshare spaces, shuttles for students, a people mover to nearby properties or pedestrian overpasses. The comment states that the proposed Project should pay for all infrastructure improvements. The letter states the proposed Project should convert the flood control channel between Sunflower Avenue and the railroad tracks from dirt excavate to concrete lined as well as provide rooftop basketball and expand bike trails. The letter states there should not be limited parking for the grocery stores, a traffic signal should be installed at Spruce and Segerstrom, and a police substation should be included in the proposed Project. The comment also discusses potential school impacts.	5.11, Public Services 5.13, Transportation 5.15, Utilities and Service Systems
<b>David Mackler, April 16, 2023</b>	
This letter states that the commenter was unable to attend the Scoping Meeting and was unaware it was occurring. The letter states that the commenter is excited and concerned regarding the proposed Project. The letter states that the commenter is concerned over the increased population density and the ability of existing utilities, public services, transportation systems, and infrastructure to support the proposed Project. The letter asks what the anticipated population is, what traffic would result, and what the impacts on infrastructure would be. The letter asks what street improvements would be made and states that a traffic light might be necessary. The letter also asks when the EIR would be ready for review, what zoning modifications are needed, whether the sewer would be able to accommodate increased demand. The letter asks how the proposed Project would impact existing utilities and what fees would be required.	3.0, Project Description 5.10, Population and Housing 5.11, Public Services 5.13, Transportation 5.15, Utilities and Service Systems
<b>John and Lorena Vidauri, April 16, 2023</b>	
This comment states that the commenter has concerns regarding the 1.3 parking ratio, concerns regarding losing Vons, and concerns regarding traffic.	3.0, Project Description 5.13, Transportation
<b>Dale Helvig, April 17, 2023</b>	
This comment requests that the analysis compare the proposed density and limited parking impact to a reduced density with at least 2.0 parking spaces per unit. This comment believes the proposed Project would result in a strain on the area.	3.0, Project Description 6.0, Alternatives
<b>Marisela Guzman, April 18, 2023</b>	
This letter states that the commenter has multiple concerns regarding the proposed Project but understands that the City needs housing. The letter states that the intersection of Bristol Street and Sunflower Avenue will have a traffic issue, which will result in GHG emissions, air pollution, and street wear. The letter states that electricity and gas is already expensive and there have been blackouts, which would increase with the proposed Project. The letter states that the commenter is opposed to the hotel and disagrees with the decrease of commercial uses and underground parking. The letter states that there needs to be an increase in police officers and the proposed Project should provide a large grocery store like Vons. In addition, the letter states	3.0, Project Description 5.1, Air Quality 5.5, Greenhouse Gas Emissions 5.7, Hydrology and Water Quality 5.11, Public Services 5.13, Transportation 5.15, Utilities and Service Systems 6.0 Alternatives

Comment Letter and Comment	Relevant EIR Section
that the proposed Project should provide affordable housing units for Santa Ana residents. The letter states the commenter is concerned about water use and wants to make sure the proposed Project is required to conserve water. The comment states that 1.3 parking spaces per unit is not enough and requests that there is a Project alternative that includes fewer housing units and more commercial uses.	

**Public Scoping Meeting**

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the City of Santa Ana hosted a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the Supplemental EIR for the proposed Project. The scoping meeting was held on March 30, 2023 from 5:30 p.m. to 7:00 p.m. at the McFadden Institute of Technology located at 2701 S. Raitt Street in Santa Ana. Approximately 60 residents attended the meeting and raised concerns about traffic, pedestrian safety, population growth, aesthetics, and cumulative impacts. Potential impacts related to transportation are described in Section 5.13, *Transportation*, impacts related to population growth are described in Section 5.10, *Population and Housing*, and cumulatively considerable impacts are evaluated throughout Chapter 5 of this Draft Supplemental EIR. In addition, a discussion of aesthetics is included in Section 5.16, *Mandatory Findings*. Comment cards received from the Scoping Meeting are included in Appendix A and summarized in Table 2-2, which also includes a reference to the EIR section(s) in which issues raised in the comment cards are addressed.

**Table 2-2: Summary of Scoping Meeting Comment Cards**

INDIVIDUALS	
<b>Judy Bryant</b>	
This comment asks whether the EIR would discuss impacts on neighborhoods within five to ten miles of the proposed Project, including air quality, noise, water resources, energy supply, and access to services. The comment states that the EIR should look at police presence onsite. This comment states that the proposed Project would result in a lot of revenue for the City of Santa Ana, but existing homes and services should be protected.	5.1, Air Quality 5.3, Energy 5.7, Hydrology and Water Quality 5.9, Noise 5.11, Public Services 5.15, Utilities and Service Systems
<b>Jack Casey</b>	
This comment states the EIR should consider how the proposed Project will be impacted by the homeless.	N/A
<b>Cynthia Edwards</b>	
This comment states that the commenter is concerned about the amount of residents that would result from the proposed Project, which would use water, electricity, and sewer, in addition to resulting in traffic. The commenter says there are already issues with the amount of electricity during hotter days. The commenter states that they are not opposed to redevelopment, however the proposed Project is dense and would include a population that would result in negative impacts to the area. The comment states that, in combination with South Coast Plaza, the proposed Project would result in increased traffic during rush hours, seasonally, and during weekends.	5.7, Hydrology and Water Quality 5.10, Population and Housing 5.13, Transportation 5.15, Utilities and Service Systems
<b>Marianna Thomas</b>	
The commenter states that the proposed Project would result in issues related to transportation due to the amount of cars needed by Project residents. The comment states that two cars per unit is realistic and would be too many cars for local streets.	5.13, Transportation

<b>Mary Hernandez</b>	
The commenter states that the site is underlain by sandy soils and is unstable. The commenter raises concerns regarding the population and density of the proposed Project and states that densely populated areas result in behavioral issues and increased crime. The commenter states that increased police presence is needed. The commenter also raises concerns regarding the increasing traffic and states that there is a lot of traffic during the morning, afternoons, and around Christmas time. The comment discusses that there are a lot of street racers and drunk drivers.	5.4, Geology and Soils 5.10, Population and Housing 5.11, Public Services 5.13, Transportation
<b>Berny Maravilla</b>	
This commenter states that more parking is needed, and 1.3 parking spaces is not enough.	3.0, Project Description
<b>Nathan Hittle</b>	
This commenter states that more parking is needed.	3.0, Project Description
<b>Celia Chavez</b>	
This commenter states that 3,700 units is too many, Vons should be kept, and a parking ratio of 1.3 is not enough.	3.0, Project Description
<b>Armando Enriquez</b>	
This comment states that the population will need more parking, there will be too many cars, and that they oppose the proposed Project.	3.0, Project Description
<b>Katherine Freeman</b>	
This comment states the commenter is concerned about toxic air from building demolition and asks what will be done to mitigate the dust/fumes from construction. This comment states that nearby residences would be impacted by trucks, noise, crowding, and eventually a population of over 10,000 people. This comment states that the amount of units should be reduced.	5.1, Air Quality 5.6, Hazards and Hazardous Materials 5.9, Noise 5.10, Population and Housing 5.13, Transportation 6.0, Alternatives

Additional comments were received by City staff which did not directly address CEQA topics or the Supplemental EIR. Those comments have been taken into consideration by the City of Santa Ana and have been communicated to the Project Applicant.

**Public Review of the Draft Supplemental EIR**

The City of Santa Ana filed a Notice of Completion with the Governor’s Office of Planning and Research, State Clearinghouse, indicating that this Draft Supplemental EIR has been completed and is available for review. A Notice of Availability of the Draft Supplemental EIR was published concurrently with distribution of this document. The Draft Supplemental EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR is available for public review digitally on the City’s website: <https://www.santa-ana.org/related-california-bristol-specific-plan/> or physically at the following locations:

City of Santa Ana, Planning Division Counter  
20 Civic Center Plaza, M-20  
Santa Ana, CA 92701

City of Santa Ana Public Library  
26 Civic Center Plaza  
Santa Ana, CA 92701

Written comments related to environmental issues in the Draft EIR should be addressed to:

Ali Pezeshkpour, AICP, Planning Manager  
City of Santa Ana Planning and Building Agency  
PO BOX 1988  
Santa Ana, CA 92702

Email: [apezeshkpour@santa-ana.org](mailto:apezeshkpour@santa-ana.org)

## Final EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft Supplemental EIR will be prepared and incorporated into a Final Supplemental EIR. The written responses to comments will be made available at least 10 days prior to the public hearing at which the certification of the Final Supplemental EIR will be considered. These comments, and their responses, will be included in the Final Supplemental EIR for consideration by the City, as well as other responsible agencies per CEQA. The Final Supplemental EIR may also contain corrections and additions to the Draft Supplemental EIR, and other information relevant to the environmental issues associated with the proposed Project. The Final Supplemental EIR will be available for public review prior to its certification by the City. Notice of the availability of the Final Supplemental EIR will be sent to all who commented on the Draft Supplemental EIR.

## 2.7 ORGANIZATION OF THIS DRAFT EIR

The Draft Supplemental EIR is organized into the following chapters. To help the reader locate information of interest, a brief summary of the contents of each chapter of this Draft Supplemental EIR is provided.

- **Chapter 1 Executive Summary:** This chapter provides a brief summary of the Project area, the proposed Project, and alternatives. The chapter also provides a summary of environmental impacts and mitigation measures that lists each identified environmental impact, applicable Project design features, standard conditions, proposed mitigation measure(s) (if any), and the level of significance after implementation of the mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either less than significant or significant and unavoidable.
- **Chapter 2 Introduction:** This chapter provides an overview of the purpose and use of the Supplemental EIR, the scope of this Supplemental EIR, a summary of the legal authority for the Supplemental EIR, a summary of the environmental review process, and the general format of the document.
- **Chapter 3 Project Description:** This chapter provides a detailed description of the proposed Project, its objectives, and a list of Project-related discretionary actions.
- **Chapter 4 Environmental Setting:** This chapter provides a discussion of the existing conditions within the Project area.
- **Chapter 5 Environmental Impact Analysis:** This chapter includes a summary of the existing statutes, ordinances and regulations that apply to the environmental impact area being discussed and a summary of impacts identified by the GPU FEIR, identification of thresholds of significance, description of evaluation methodology, the analysis of the proposed Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the proposed Project; plans, policies, and programs that could reduce potential impacts; any applicable GPU FEIR mitigation measures, and the feasible Project specific mitigation measures that

would reduce or eliminate the significant adverse impacts identified. Impacts that cannot be mitigated to less than significant are identified as significant and unavoidable.

This chapter also summarizes the significant and unavoidable impacts that would occur from implementation of the proposed Project and provides a summary of the environmental effects of the implementation of the proposed Project that were found not to be significant. Additionally, this chapter provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the proposed Project.

- **Chapter 6 Alternatives:** This chapter describes and analyzes a reasonable range of alternatives to the proposed Project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more significant effects of the proposed Project. As required by the CEQA Guidelines, the environmentally superior alternative is also identified.
- **Chapter 7 Report Preparation and Persons Contacted:** This chapter lists authors of the Draft Supplemental EIR and City staff that assisted with the preparation and review of this document. This section also lists other people that were contacted for information that is included in this Supplemental EIR document.

## 2.8 INCORPORATION BY REFERENCE

In accordance with Section 15150 of the CEQA Guidelines and to reduce the size of the report, the following documents are hereby incorporated by reference into this Supplemental EIR and are available for public review at the City of Santa Ana, Planning Division, 20 Civic Center Plaza, Santa Ana, CA 92701. A brief summary of the scope and content of these documents is provided below.

**City of Santa Ana General Plan Update 2022:** The City of Santa Ana General Plan provides a general, comprehensive, and long-range guide for community decision-making. The General Plan consists of a vision statement, 5 core values, and 12 elements. Each element of the General Plan addresses a certain aspect of the City's growth and development. The individual elements identify goals and policies for existing and future conditions within the City. The following elements comprise the City's General Plan:

- Community Element
- Mobility Element
- Economic Prosperity Element
- Public Services Element
- Conservation Element
- Open Space Element
- Noise Element
- Safety Element
- Land Use Element
- Historic Preservation Element
- Urban Design Element
- Housing Element

The General Plan is utilized throughout this document as a fundamental planning document governing development within the City. Background information and policy information from the General Plan is cited in various sections and chapters of this Supplemental EIR.

**Santa Ana Municipal Code:** The City of Santa Ana Municipal Code consists of regulatory, penal, and administrative ordinances of the City of Santa Ana. The Municipal Code guides the City's control of land uses, in concert with General Plan goals, objectives, and policies. The City's Zoning Code (Chapter 41 of the Municipal Code) identifies land uses permitted and prohibited according to the zoning category of particular parcels. The Municipal Code and Zoning Code are utilized throughout this document as a regulatory document governing development and land use activities within the City. Regulatory information from the Municipal Code and Zoning Code is cited in various sections and chapters of this Supplemental EIR.

*This page intentionally left blank.*