

**SECTION 5.0**  
**CUMULATIVE IMPACTS**

---

## **5.0 CUMULATIVE IMPACTS**

### **5.1 DEFINITION OF CUMULATIVE IMPACTS**

Section 15355 of the California Environmental Quality Act (CEQA) Guidelines defines cumulative impacts as:

“...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts”.

Section 15355 further describes potential cumulative impacts as:

“(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impacts from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

Cumulative impacts refer to two or more individual impacts which, when considered together, are considerable or which compound or increase other impacts. The individual effects may be changes resulting from a single project or from a number of projects. A cumulative impact refers to the degree of change in the environment resulting from a particular project, plus the incremental impacts created by other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts may reveal that relatively minor impacts associated with a particular project may contribute to more significant impacts when considered collectively with other projects taking place over a period of time.

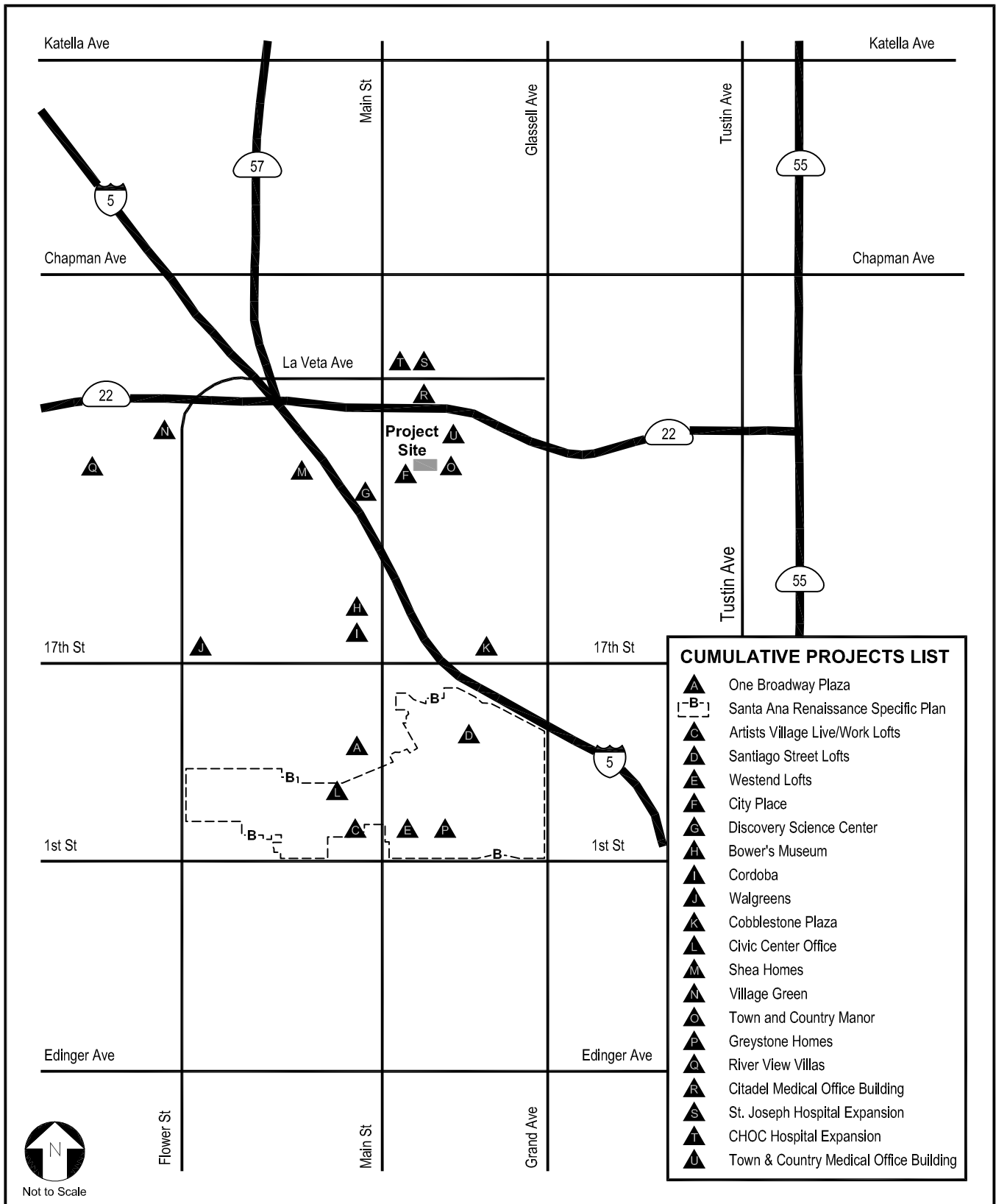
### **5.2 CUMULATIVE PROJECTS**

Section 15130(b)(1) of the CEQA Guidelines provides two options for considering potentially significant cumulative adverse impacts. This analysis can be based on either:

“(a) A list of past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

(b) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted and certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency.”

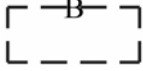
The cumulative impacts analysis requires consideration of other projects in an area, in conjunction with the proposed project, to assess the potential for significant adverse cumulative impacts. For this DEIR, the potential environmental impacts of the proposed City Place Sky Lofts project were considered in conjunction with the potential environmental impacts of buildout of other projects approved in the area, which are shown on Figure 5-1, as well as buildout of the City of Santa Ana General Plan. Buildout of the City of Orange General Plan was also considered in the cumulative analysis. A list of cumulative projects shown in Figure 5-1 is included in Table 5-1, below.



Sources: City of Orange (2007).  
City of Santa Ana (2007).

**Figure 5-1**  
**Cumulative Projects Locations**

**TABLE 5-1  
PLANNED AND PROPOSED LAND USES IN THE VICINITY OF CITY PLACE SKY LOFTS**

INDEX <sup>[1]</sup>	NAME	TYPE OF DEVELOPMENT	ACRES/DU <sup>[2]</sup> /SF <sup>[3]</sup> /TSF <sup>[4]</sup>	STATUS
<b>CUMULATIVE PROJECTS IN THE CITY OF SANTA ANA</b>				
A.	One Broadway Plaza	37-Story Office Tower	518,000 SF	Approved
	Santa Ana Renaissance Specific Plan	Redevelopment and Rehabilitation of Residential, Commercial and Transit	120 Blocks and 421-Acres	EIR Expected for Winter 2007
C.	Artists Village Live/Work Lofts			
	Phase I: Main Street Lofts	Live/Work	30 DU	Complete
	Phase II: East Village Lofts	Live/Work	40 DU	Complete
	Phase III: Sycamore Lofts	Live/Work	16 DU	Plans Are Being Finalized
D.	Santiago Street Lofts	Transit Oriented Live/Work	108 DU	Under Construction
E.	Westend Lofts	Mixed Use	16,000 TSF (5 Residential DU)	EIR
F.	City Place	Mixed Use	57,000 TSF Commercial; 74 Live/Work DU; and 168 Town Home DU on a Total of 17.7 Acres	Under Construction
G.	Discovery Science Center	Phase II Expansion	275-seat Large Format IMAX-type Theatre; 30,000 SF New Exhibit Area; 15,520 SF Office-warehouse; 351-stall Parking Structure	Approved by City Council in April, 2002. Currently Fundraising
H.	Bower's Museum	Facility Expansion	33,000 SF Gallery and 340 Seat Auditorium	Completed
I.	Cordoba	Mixed Use	3,000 SF Retail; 45 Residential DU	Approved by City Council. Construction expected for 2007
J.	Walgreens	Walgreens Store and Drive Through Pharmacy	12,400 SF	Approved. Submitting Building Plan Check
K.	Cobblestone Plaza	Commercial Center	11,000 SF	Under Construction
L.	Civic Center Office	Office Building	2-Story; 4,166 SF	Approved
M.	Shea Homes	Single-family Residential	36 DU	Phases I and II are Complete. Phase III Under Construction
N.	Village Green	Mixed Use	380 DU on 17.9 Acres	Site Plan Review

**TABLE 5-1  
PLANNED AND PROPOSED LAND USES IN THE VICINITY OF CITY PLACE SKY LOFTS**

INDEX <sup>[1]</sup>	NAME	TYPE OF DEVELOPMENT	ACRES/DU <sup>[2]</sup> /SF <sup>[3]</sup> /TSF <sup>[4]</sup>	STATUS
		Residential		
O.	Town and Country Manor	11-Story Residential Tower (Senior Living)	174 Senior Living DU	Site Plan Review
P.	Greystone Homes	Live/Work	38 DU on 1.22 Acres	Site Plan Review
Q.	River View Villas	Affordable Residential Housing	41 DU on 2.9 Acres	Proposed
<b>CUMULATIVE PROJECTS IN THE CITY OF ORANGE</b>				
R.	Citadel Medical Office Building	Medical Office Building	Not available	Under construction
S.	St. Joseph Hospital Expansion	Exterior Remodel for Seismic Retrofit	Not available	Under review
T.	CHOC Hospital Expansion	CHOC Master Plan	565,000 SF	Application Incomplete
U.	Town & Country Medical Office Building	4-Story Medical Office Building	65,370 SF	Waiting for Applicant Response to Staff Comments

Source: P&D Consultants 2007.

<sup>[1]</sup> The index refers to the cumulative project as they are labeled in Figure 5-1.

<sup>[2]</sup> Dwelling units.

<sup>[3]</sup> Square feet.

<sup>[4]</sup> Total square feet.

The study area for cumulative impacts varies by environmental parameter. For example, the study area for the air quality analysis comprises the entire South Coast Air Basin, and therefore, the air quality analysis inherently has a cumulative analysis built into its methodology. Traffic, like the air quality analysis, has a cumulative analysis included. Other environmental parameters such as aesthetics have a much more localized study area and are evaluated for consistency and context with the plans for the immediate project area.

## 5.3 CUMULATIVE IMPACTS ANALYSIS

### 5.3.1 CUMULATIVE IMPACTS RELATED TO AESTHETICS

The project site is in an area surrounded by residential, commercial, and retail uses and is designated in the City's General Plan as District Center. The project site is intended to be developed with an urban character that includes a mixture of high-rise office, commercial, and residential uses which provide shopping, business, cultural, education, recreation, entertainment, and housing opportunities. The project site would change from an empty lot to a postmodern high-rise residential development consisting of a 27-story residential tower; four levels of two-story town homes; four above-grade parking and two below-grade parking levels; and amenity deck (Podium Level);. Although the 27-story residential tower would be 11 stories taller than the tallest structure in the area (the Ameriquest building), the proposed project would blend in with adjacent buildings, as it would have similar architectural style. For example, the proposed project has a postmodern architectural style which would complement the postmodern architectural style of City Place and the Ameriquest building. The proposed project and other projects

planned for the vicinity of the project site would be aesthetically compatible with the existing surrounding land uses. Therefore, the proposed project would not have a significant adverse cumulative impact on visual character.

The project site is in an urban setting and is surrounded by existing on-street lighting. Light associated with the proposed residential tower and parking structure would add to the amount of existing light on and near the project site. Due to the height of the proposed tower, which is taller than adjacent structures, additional light would be introduced and could result in significant impacts. The parking structure would have nighttime security lighting and could generate an appreciable amount of additional glare due to its building materials. In addition, outdoor lighting on the ground floor of the residential tower would increase the amount of light on the site. However, mitigation measures are included to reduce these potential impacts. Therefore, the proposed project would result in less-than-significant impacts with mitigation related to light and glare.

In the spring, summer, fall, and winter late afternoon and early evening the 27-story tower would cast shadow on certain residential uses east of Lawson Way, northeast of South Parker Street, and southeast of Memory Lane and Santiago Park. This impact cannot be mitigated and would remain a significant adverse impact of the proposed project. Therefore, the proposed project would result in significant adverse cumulative impacts on visual quality related to shade and shadow.

### 5.3.2 CUMULATIVE IMPACTS RELATED TO AIR QUALITY

Regional programs to reach air quality goals and standards would be adhered to by cumulative projects, thus reducing impacts. However, in accordance with South Coast Air Quality Management District (SCAQMD) methodology, any project that produces a significant air quality impact in an area that is out of attainment would also result in cumulative impacts that are considered potentially significant. The proposed project is within an area designated with a non-attainment status for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and it would result in air pollutant emissions in exceedance of construction and operational thresholds established by the SCAQMD. During the construction phase of the project, ROG would exceed the construction phase thresholds established by the SCAQMD and would result in a significant adverse short-term regional air quality impact. These ROG emissions are almost entirely due to architectural coatings and cannot be mitigated to below a level of significance unless through extending the coating application and delaying building completion.

Project operations would result in emissions of ROG that would exceed the operational phase thresholds established by the SCAQMD. These ROG emissions cannot be mitigated to below a level of significance and would constitute an unavoidable significant adverse impact of the proposed project related to air quality. Therefore, the proposed project would contribute to cumulative adverse impacts related to air quality.

### 5.3.3 CUMULATIVE IMPACTS RELATED TO CULTURAL RESOURCES

As discussed in Section 4.4 (Cultural Resources), there are no identified cultural resources on the project site. It is possible that subsurface cultural resources may be discovered during construction. However, mitigation measures C-1 and C-2 have been incorporated into the proposed project to ensure that, in the event subsurface cultural resources are found during site preparation, grading or construction, they are appropriately excavated, documented, and preserved. Implementation of these mitigation measures would ensure that project impacts to cultural resources would be less than significant. Development of all cumulative projects combined has the potential to impact cultural resources regionally. However, the cumulative impact to cultural resources can similarly be mitigated through data recovery and the avoidance of important

cultural resources. Therefore, the proposed project would not contribute to a cumulative adverse impact on cultural resources.

#### 5.3.4 CUMULATIVE IMPACTS RELATED TO GEOLOGY AND SOILS

Based on the exploration and analysis provided in the Draft Geotechnical Report, Fuscoe Engineers conclude that the proposed project is feasible from a geotechnical standpoint, provided the recommendations presented in the report are implemented in the design and construction of the proposed project. No significant geotechnical constraints were identified on-site that cannot be mitigated to below a level of significance by proper planning, design, and sound construction practices. Mitigation measures have been included that require the preparation of a final geotechnical report that addresses site-specific geotechnical considerations, and the implementation of the recommendations of the report. Compliance with these mitigation measures would reduce impacts of the proposed project related to geology and soils to below a level of significance. Any new development in the region would also be required to be constructed to withstand probable seismic forces and other geologic and soil conditions found at the particular site of each development. Geotechnical impacts are also site-specific. Therefore, cumulative projects are also geographically removed from the geologic context of the proposed project. Implementation of the proposed project would not result in a substantial incremental impact to geology and soils and would not result in significant cumulative impacts.

#### 5.3.5 CUMULATIVE IMPACTS RELATED TO HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 4.6 (Hazards and Hazardous Materials), the only potential for impacts with regard to hazards and hazardous materials is the presence of an underground jet fuel line which traverses the southern boundary of the project site. The potential risks associated with the transport of hazardous materials on the project site would not be substantially greater than the current risk associated with the existing transport of hazardous materials elsewhere in the City adjacent to the jet fuel lines. As discussed in Section 4.6, the jet fuel line is currently inert and is not planned for use in the near future given the unlikelihood of airport uses resuming on the former El Toro Marine Corps Air Station (MCAS), which the inactive jet fuel line served. The proposed project itself does not contribute to the propagation or use of hazardous materials. There are no known previous hazardous uses on the project site. Further, the handling, transport, storage, and disposal of hazardous materials are strictly regulated. The proposed project would not result in a significant adverse impact related to hazards and hazardous materials. Therefore, the project would not contribute to long-term, significant adverse cumulative adverse impacts related to hazards or hazardous materials.

#### 5.3.6 CUMULATIVE IMPACTS RELATED TO HYDROLOGY AND WATER QUALITY

As described in Section 4.7 (Hydrology and Water Quality), the runoff water from the project site would not exceed the capacity of the existing storm drain system or result in flooding on- or off-site. Therefore, impacts related to hydrology and drainage would be less than significant with mitigation, and would not result in adverse cumulative impacts.

As discussed in Section 4.7 (Hydrology and Water Quality), the proposed project has the potential to result in long-term impacts to water quality due to the addition of urban pollutants and an increase in site activities associated with the new development. The proposed project could generate low levels of water quality contaminants which could be carried in storm water runoff from paved surfaces to Santiago Creek, Santa Ana River and to the Pacific Ocean. Presently, the Regional Water Quality Control Board (RWQCB) designates the mouth of the Santa Ana River at the Pacific Ocean as an Impaired Water Body,

in accordance with Section 303 of the Clean Water Act. Implementation of mitigation measures W-3 and W-4 would ensure that the proposed project complies with the applicable RWQCB requirements and applicable National Pollutant Discharge Elimination System (NPDES) permit requirements to reduce potential water quality impacts to downstream water bodies. Specifically, mitigation measure W-3 requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) to control possible pollutant loading in storm water discharges from the project site as part of the State's General Construction Permit. In addition, mitigation measure W-4 requires that WQMP addressing post-construction storm water runoff be prepared and approved by the City of Santa Ana. These mitigation measures thus would reduce the water quality impacts of the proposed project to a level that is less than significant.

Other cumulative projects in the area would be required to comply with similar measures, as well as the runoff treatment requirements associated with the applicable Drainage Area Master Plan (DAMP) and other regional water quality regulations. Therefore, the proposed project would not contribute to a significant adverse cumulative impact to water quality.

### 5.3.7 CUMULATIVE IMPACTS RELATED TO LAND USE AND PLANNING

As discussed in Section 4.8 (Land use and Planning), the proposed project is consistent with the General Plan designation for the project site and the density would be less than allowed under the General Plan and SD-59. Therefore no mitigation is required. Cumulative projects in the area would also be required to comply with the applicable General Plan, and with established densities and land use designations for those projects. Therefore, the proposed project would not result in a cumulative adverse impact related to land use and planning.

### 5.3.8 CUMULATIVE IMPACTS RELATED TO NOISE

Cumulative noise impacts related to construction activities have the potential to occur due to cumulative projects developing with coinciding schedules or in close proximity to the project site. Through the Municipal Code, the City of Santa Ana limits construction activities to the least noise sensitive parts of the day and provides Code exemptions to construction-related noise. Therefore, compliance with the City Municipal Code would reduce cumulative impacts related to construction of the proposed project in combination with the other cumulative projects to a level that is less than significant.

As described in Section 4.9 (Noise), implementation of the proposed project in the short term (2010) and long term (2030) would not result in an increase of the traffic-generated Community Noise Equivalent Level (CNEL) above the City of Santa Ana General Plan standards. Cumulative projects were considered in this noise analysis. Impacts related to mechanical noise associated with the parking garage ventilation system would be reduced to below a level of significance with mitigation that requires compliance with the noise standards of the City of Santa Ana Municipal Code. Similar types of noise impacts of each cumulative project would be required to comply with the City of Santa Ana Municipal Code, thus reducing impacts to a level that is less than significant. Therefore, implementation of the proposed project would not result in a significant adverse cumulative impact related to noise.

### 5.3.9 CUMULATIVE IMPACTS RELATED TO POPULATION AND HOUSING

As discussed in Section 4.10 (Population and Housing), the proposed project would include 353 additional dwelling units which would generate an estimated 706 persons on the project site. However, it is not anticipated that this increase would exceed regional projections for the City of Santa Ana based on the City of Santa Ana General Plan, and therefore no mitigation is required. Cumulative

projects in the area would also be required to comply with and not exceed regional population projections. Therefore, the proposed project would not result in a cumulative adverse impact related to population and housing.

### 5.3.10 CUMULATIVE IMPACTS RELATED TO PUBLIC SERVICES

As discussed in Section 4.11 (Public Services), the potential impacts of the proposed project on public services and facilities would be less than significant without mitigation. However, mitigation measures P-1 and P-2 have been provided to enhance public protection, security, and police officer safety. The proposed project would not contribute to a significant adverse impact on public services on-site or in the project area. Therefore, the proposed project would not contribute to a significant cumulative adverse impact related to public services.

### 5.3.11 CUMULATIVE IMPACTS RELATED TO RECREATION

As discussed in Section 4.12 (Recreation), implementation of the proposed project would increase the demand for parks and recreational facilities in the City. To help meet the City's parkland goals, the proposed project would be subject to the parkland dedication requirements provided in Section VIII of the Santa Ana Municipal Code. A mitigation measure has been included for the proposed project that requires compliance with the City's public dedication requirements either through provision of private open space, public land dedication, fees, or other vehicles acceptable to the City. This mitigation measure reduces the recreation impacts of the proposed project to a level that is less than significant. Cumulative projects in the City of Santa Ana would also be required to comply with parkland dedication requirements. Therefore, the proposed project would not contribute to a significant cumulative adverse impact related to recreation.

### 5.3.12 CUMULATIVE IMPACTS RELATED TO TRANSPORTATION AND TRAFFIC

As mentioned previously, the project area for the project-related and cumulative traffic impact analysis for the proposed project was determined based on the potential of the proposed project to exceed the threshold for significant impacts for surrounding road segments, intersections, and freeway ramps. As described in Section 4.13 (Transportation and Traffic), implementation of the proposed project would result in temporary traffic impacts. For the 2010 traffic conditions, the Main Street road segment between La Veta Avenue and Town & Country Road cannot be mitigated to below a level of significance without amending the Master Plan of Arterial Highways (MPAH) road classification from a Major Arterial to a Principal Arterial. The road reclassification from a Major Arterial to a Principal Arterial would provide one additional lane in each direction. This road reclassification would require an amendment to the City of Orange General Plan and the City of Santa Ana General Plan.

As discussed in Section 4.13 (Transportation and Traffic), Main Street between La Veta Avenue and Town & Country Road would operate at an acceptable LOS D in 2030 without and with the proposed project. Daily traffic volumes on Main Street in 2030 were generally forecasted to be lower than the daily traffic volumes in 2010 because the buildout of the MPAH would provide additional road capacity on the parallel north-south arterial highways such as Bristol Street to the west and Grand Avenue to the east. The additional north-south arterial highways road capacities would alleviate traffic demand on Main Street by shifting some of the traffic demand to Bristol Street and Grand Avenue. Therefore, implementation of the proposed project would create a temporary significant and unavoidable adverse impact to Main Street between La Veta Avenue and Town & Country Road until Bristol Street and Grand Avenue is built out to the MPAH designations.

As described above, the proposed project would result in a significant adverse cumulative impact in the short term related to traffic and transportation.

### 5.3.13 CUMULATIVE IMPACTS RELATED TO UTILITIES AND SERVICE SYSTEMS

As discussed in Section 4.14 (Utilities and Service Systems), there are no significant adverse impacts to public utilities and service systems on the project site. However, mitigation measures have been provided to ensure compliance with regulations related to energy conservation and to ensure coordination with utility providers. The proposed project would not contribute to a significant adverse impact on utilities or service systems on-site or in the project area. Therefore, the proposed project would not contribute to a cumulative adverse impact related to utilities and service systems.