

# CHAPTER 3

## Revisions to the Draft EIR

This section contains revisions to the Draft EIR based upon: (1) clarifications required to prepare a response to a specific comment; and/or (2) typographical errors or corrections identified by the City. These revisions do not alter any impact significance conclusions that were identified in the Draft EIR.

The following changes to the Draft EIR are identified herein in ~~strikeout~~ text to indicate deletions and in underlined text to signify additions.

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### Section 1, Executive Summary

Page 1.1: The email address for Selena Kelaher is hereby revised as follows:

skelaher-@santa-ana.org

Page 1-5: The second row, last column of Table 1-1 is hereby revised as follows:

<p><b>Impact AES-2:</b> The project would not substantially degrade the existing visual character or quality of the site and its surroundings.</p>	<ul style="list-style-type: none"> <li>• Santa Ana Municipal Code Section 33-185, Street Tree Species to Be Planted</li> <li>• Santa Ana Municipal Code Section 33-188, Site Plan Approval</li> <li>• Santa Ana Municipal Code Section 33-193, Building Materials Near Trees, Shrubs</li> <li>• Santa Ana Municipal Code Chapter 41, Article XV, Division I, Section 41-1304</li> </ul>	<p><b>Mitigation Measure AES-1:</b> Construction plans and specifications shall state that the following measures shall be implemented by the construction contractor to protect the trees along the eastern <del>and southern</del> project site boundary <u>and to the extent feasible protect and preserve the existing mature trees within the 15-foot setback along the southern boundary</u> that are planned for preservation during construction of the proposed project pursuant to the 2018 Arborist Report:</p>	<p><u>Less than significant Significant and Unavoidable</u></p>
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## Section 3.0, Project Description

Page 3-7: The last row, 3rd column of Table 3-2 is hereby revised as follows:

Total	496	<del>496</del> 776	128	904
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## Section 3.3, Project Site Description

Page 3-1: The second sentence of Section 3.3, *Project Site Description*, is hereby revised as follows:

The office building is 81,172 square feet in size, was constructed in 1982~~0~~ and used by the Wells Fargo bank until July 2017.

## Section 3.5, Project Objectives

Page 3-4: The first sentence of Section 3.5, *Project Objectives*, is hereby revised as follows:

The following project objectives ~~have been identified by the applicant and the City for support the project's underlying purpose to develop multi-family residential uses on the project site and assist with meeting the City's housing needs:~~

## Section 3.7, Project Design Features

Page 3-18: Project Description Feature (PDF) 1, is hereby revised as follows:

PDF-1: The landscape plan will incorporate the existing mature trees located along the eastern ~~and southern~~ project site boundary ~~ies~~ and to the extent feasible protect and preserve the existing mature trees within the 15-foot setback along the southern boundary within the 15-foot setback along the southern boundary, which were identified as healthy by the Arborist Report.

## Section 4.1, Aesthetics

Page 4.1-6: The second sentence of the Project Vicinity text, on page 4.1-6 is hereby revised as follows:

In addition, the OC Discovery Cube and its 10-story high solar array cube, restaurants, a hotel, and a 10-story office building are located ~~across and adjacent to the site on~~ within the N. Main Street viewshed and provide for an urban and developed character.

Page 4.1-12: The second to last paragraph on page 4.1-12 is hereby revised as follows:

Figure 4.1-6~~7~~ provides the existing views from N. Main Street toward the portion of Santiago Park that is adjacent to the project site and Figure 4.1-8~~6~~ shows views from within the park toward N. Main Street.

Page 4.1-17: The second sentence in the second paragraph on page 4.1-17 is hereby revised as follows:

The project would change the views of the 2-story office structure, asphalt parking areas, and mature landscaping, to a taller 5-story multi-family residential development with a central parking structure that would be 8 levels above ground and topped with a fitness center. ~~that would be that~~ The project landscaping would include both existing mature and new landscaping.

**Page 4.1-27: The first sentence of Mitigation Measure AES-1 is hereby revised as follows:**

**Mitigation Measure AES-1:** Construction plans and specifications shall state that the following measures shall be implemented by the construction contractor to protect the trees along the eastern ~~and southern~~ project site boundary and to the extent feasible protect and preserve the existing mature trees within the 15-foot setback along the southern boundary within the 15-foot setback along the southern boundary that are planned for preservation during construction of the proposed project pursuant to the 2018 Arborist Report:

## **Section 4.2, Air Quality**

**Page 4.2-13: The following header numbering is hereby revised as follows:**

### **4.2.11 Methodology**

**Page 4.2.14: The second to last sentence of the first full paragraph on page 4.2-14 is hereby revised as follows:**

Trip generation rates were available from the traffic impact analysis prepared for the project (see Appendix 1 of this EIR).

**Page 4.2-19: The following header numbering is hereby revised as follows:**

### **4.2.22 Level of Significance After Mitigation**

## **Section 4.3, Biological Resources**

**Page 4.3-2: The last sentence of the first full paragraph on page 4.3-2 is hereby revised as follows:**

~~Within this EIR, the~~ CESA utilizes the following acronyms are used to identify state special-status species:

## **Section 4.4, Cultural/Historic Resources**

**Page 4.4-5: The last sentence of the Main Street Corridor text is hereby revised as follows:**

However, the Burlington Northern Santa Fe (formally Atchison, Topeka and Santa Fe) Railway (to the ~~west~~ east of the site) is a recorded historic resource determined eligible for the National Register of Historic Places by the California State Historic Preservation Officer along the entire alignment for contributions to broad patterns of history (Cogstone 2018).

**Page 4.4-5: The first sentence of the first paragraph of the Park Santiago Neighborhood text is hereby revised as follows:**

The project site is located at the northwest corner of the Park Santiago neighborhood, which includes approximately ~~4,033~~ 1,173 single-family residences (Santa Ana GIS) and is located east of I-5, west of Lincoln Street, south of Santiago Creek, and north of 17th Street, as shown in Figure 4.4-1.

**Page 4.4-5: The first sentence of the second paragraph of the Park Santiago Neighborhood text is hereby revised as follows:**

Higher ~~density~~ intensity uses have historically been located on the boundaries of, or adjacent to, the Park Santiago Neighborhood.

**Page 4.4-5: The second sentence of the Main Street Corridor text is hereby revised as follows:**

In addition, the OC Discovery Cube and its 10-story high solar array cube, restaurants, a hotel, and a 10-story office building are located ~~across and adjacent to the site on~~ within the N. Main Street viewshed and provide for an urban and developed character.

**Page 4.4-5: The first sentence of the last paragraph on page 4.4-5 is hereby revised as follows:**

As described in the Historic Review and listed in Table 4.4-1, of approximately ~~4,033~~ 1,173 properties in the Park Santiago neighborhood (Santa Ana GIS), a total of 32 (~~3~~ 2.7 percent) have been documented in the local Santa Ana Register of Historic Properties. Of these 5 are in the landmark category, 8 are in the key category, and 19 are in the contributive category (Table 4.4-1).

**Page 4.4-11: The first sentence of the second bullet on page 4.4-11 is hereby revised as follows:**

The Taylor-Gustlin House is a landmark property at 2520 N. Valencia Street (Property Number 414) and located next to the Taylor-Oglesby House described previously. Views between this property and the project site are blocked by intervening development, as shown on Figure 4.4-~~23~~.

## Section 4.5, Greenhouse Gas Emissions

**Page 4.5-1: The second to last row of Table 4.5-1 is hereby revised as follows:**

<u>SCAQMD Threshold (service Population)</u>	<u>4.380</u>
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**Page 4.5-1: The third sentence of the second paragraph is hereby revised as follows:**

As shown, the total net annual GHG emissions would be approximately ~~4.3042~~ 4.3042 MTCO<sub>2e</sub> per year per service population, which would be less than the SCAQMD Tier 4 Option 3 threshold of 4.80 MTCO<sub>2e</sub> per year per service population.

**The third row of Table 4.5-2 is hereby revised as follows:**

H-1	Motor Vehicle Air Conditioning Systems – Reduction from Non-Professional Servicing	<del>Residents and employees would be prohibited from</del> <u>The project would not provide locations for performing motor vehicle air conditioning repairs on the project site and required to use professional servicing.</u>
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## Section 4.6, Hazards and Hazardous Materials

**Page 4.6-6: The following header numbering is hereby revised as follows:**

~~4.6.13~~ 4.6.13 Thresholds of Significance

**Page 4.6-7: The following header numbering is hereby revised as follows:**

~~4.2.24~~ 4.2.24 Methodology

~~4.6.35~~ 4.6.35 Environmental Impacts

**Page 4.6-7: The following text is hereby revised as follows to provide clarification:**

**Lead:** As described previously, the results of the 2018 soil gas testing indicated each sample had detectable levels of lead with concentrations ranging from 4.68 to 36.7 mg/Kg that are well below residential DTSC screening level of 80 mg/Kg. As a result, impacts related to lead would not occur during implementation of the proposed project.

**Soil Gas:** ~~As described previously, the results of the 2018 soil gas testing indicated each sample had detectable levels of lead with concentrations ranging from 4.68 to 36.7 mg/Kg that are well below residential DTSC screening level of 80 mg/Kg. In addition, none of the samples had detectable levels of VOCs (including: benzene, toluene, ethylbenzene, xylenes, trichloroethylene, perchloroethylene) or formaldehyde (Hillman, 2018). As a result, impacts related to soils gasses would not occur during implementation of the proposed project.~~

**Page 4.6-10: The following header numbering is hereby revised as follows:**

**4.2.46 Level of Significance After Mitigation**

**Section 4.7, Land Use and Planning**

**Page 4.7-4: The following header is hereby included on page 4.7-4 after the first bullet point:**

**Policies:**

**Page 4.7-11: The first sentences of Section, 4.7.3, Environmental Setting is hereby revised as follows:**

The project site consists of 5.93-acres of land that is developed with a vacant 2-story 81,172 square foot office building that was constructed in 1982~~0~~ and used by the Wells Fargo bank.

**Page 4.7-14: The second through fourth sentences of the Park Santiago Neighborhood text is hereby revised as follows:**

The Park Santiago neighborhood identifies a 0.54-square mile portion of the City that contains approximately ~~4,033~~ 1,173 single-family residences (~~Cogstone 2018~~) (Santa Ana GIS). Of these residences, 78.1 percent are owner occupied and 21.9 percent are renter occupied (Santa Ana GIS). Based on the Census Factfinder 2016 information for the City of Santa Ana, the average household size for single family residential is 4.4 persons per dwelling unit. However, the City's GIS data shows that the existing average household size in Park Santiago is 3.3 persons per household. Thus, the Park Santiago Neighborhood contains approximately ~~3,871~~ 4,545 residents.

**Page 4.7-17: The first and second sentences of the Concourse Node Designation text is hereby revised as follows:**

The General Plan identifies the project site as the Main Street Concourse node on ~~Figure~~ Exhibit 7 of the Urban Design Element and describes that this area is anticipated to function as a major activity node in the future because of its location and visibility from three major highways. Additionally, the General Plan states that the area represents great opportunity for the establishment of a cohesive, height intensity, mixed activity center with a strong presence in the region (Urban Design Element Page A-165).

**Page 4.7-31: The seventh row of Table 4.7-2 is hereby revised as follows:**

<p><b>Policy 3.11:</b> Maximize the use of street trees and parkway landscaping to create a pleasant travel experience and positive City image.</p>	<p><b>Consistent.</b> The project would maintain <u>nearly all</u> the existing street trees and add additional trees as required by the City's streetscaping guidelines. <u>Where feasible, city-owned street trees will be replanted, pursuant to the City's existing policies relating to street trees, in order to maintain a pleasant travel experience and a positive City image.</u></p>
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## Section 4.9, Population and Housing

**Page 4.9-5: The second through fourth lines is hereby revised as follows:**

City of Orange and the total Orange County area are provided in Table 4.9-2, which shows a generally similar breakdown of unit type within the Cities and the County. However, the City of Santa Ana has a higher percentage of multi-family 5+ housing at 32.1% of units within the City, than the City of Orange (18.2 percent), and the County of Orange (25.8 percent).

**Page 4.9-8: The first three sentences of the Park Santiago Neighborhood text is hereby revised as follows:**

As described in Section 4.7, *Land Use and Planning*, the project site is located at the northwest corner of the Park Santiago neighborhood that contains approximately 1,033 1,173 single-family residences (~~Cogstone-2018~~) (Santa Ana GIS). Of these residences, 78.1 percent are owner occupied and 21.9 percent are renter occupied (Santa Ana GIS). Based on the Census information ~~above for the City of Santa Ana,~~ the average household size for single family residential is 4.4 persons per dwelling unit. However, the City's GIS data shows that the existing average household size in Park Santiago is 3.3 persons per household. Thus, the Park Santiago neighborhood contains approximately 3,871 ~~4,545~~ residents.

## Section 4.10, Public Services

**Page 4.10-10: The second sentence of Section 4.10.4.2, *Park and Recreation Services Environmental Setting*, is hereby revised as follows:**

Based on the 2016~~7~~ population estimate of 341,341 residents, the City has approximately 1.23 acres of public park and/or recreational space per every 1,000 residents.

**Page 4.10-15: The following header numbering is hereby revised as follows:**

**4.10.3.6~~7~~ Park and Recreation Services Regulations that Reduce Potential Impacts**

**4.10.3.7~~8~~ Park and Recreation Services Mitigation Measures**

**4.10.3.8~~9~~ Park and Recreation Services Level of Significance After Mitigation**

## Section 4.11, Transportation and Traffic

**Page 4.11-4: The second bullet point on this page is hereby revised as follows:**

**Santa Clara Avenue** is oriented in the east-west direction and on the west side of I-5 it is generally a 4-lane undivided roadway and on-street parking is generally not permitted within the traffic study area. On the east side of I-5 Santa Clara Avenue is a 2-lane undivided roadway and on-street parking is permitted.

**Page 4.11-20: The first sentence of the second paragraph is hereby revised as follows:**

Table 4-1 details the cumulative projects, which are shown in Figure 4-4 12 of the Traffic Impact Analysis (Appendix J).

**Page 4.11-41: The following header numbering is hereby revised as follows:**

**4.9~~11~~.8 Regulations that Reduce Potential Impacts**

**4.9~~11~~.9 Mitigation Measures**

## 4.911.10 Level of Significance After Mitigation

### Section 4.12, Tribal Cultural Resources

**Page 4.12-6: The third sentence in the third paragraph on page 4.12-6 is hereby revised as follows:**

If a unique a tribal cultural resource cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the project applicant's expense.

### Section 5.0, Mandatory Findings of Significance

**Page 5-4: The second to last bullet on page 5-4 is hereby revised as follows:**

- Increased ambient noise associated with an increase in activities and traffic associated with ~~future~~ site-specific the development projects (see Section 4.8, *Noise*).

### Section 6.0, Alternatives

**Page 6-9: The first sentence of the second paragraph on page 6-9 is hereby revised as follows:**

The proposed project would develop 496 multi-family residential units that would house approximately ~~938~~55 residents at full occupancy, which would be within SCAGs projected growth.

**Page 6-13: The first sentence of the third full paragraph on page 6-13 is hereby revised as follows:**

The Reduced Project Alternative would increase the 40-foot setback to 90-feet and eliminate a majority of the views of the 5th floor structures that could be seen from N. Spurgeon Street because the structures above 4 floors are fewer and are located ~~650~~-feet further back than the proposed project.

**Page 6-24: The second sentence of Section 6.9, *Environmentally Superior Alternative*, on page 6-24 is hereby deleted as follows:**

~~Although it has been determined that no significant environmental impacts from the proposed project would occur, this EIR provides a CEQA compliant discussion of project alternatives that could reduce the need for mitigation.~~