

August 2015 | Final Environmental Impact Report No. 348
State Clearinghouse No. 2013101087

ANAHEIM CANYON SPECIFIC PLAN

for City of Anaheim

Prepared for:

City of Anaheim

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1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).

According to CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the Anaheim Canyon Specific Plan during the public review period, which began May 28, 2015, and closed July 13, 2015. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FEIR

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this FEIR.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the DEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A1 through A9). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

Section 3. Revisions to the Draft EIR. This section contains revisions to the DEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the DEIR for public review.

1. Introduction

The responses to comments contain material and revisions that will be added to the text of the FEIR. City of Anaheim staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Anaheim) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses.

This section provides all written responses received on the DEIR and the City of Anaheim's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.


Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations			
A1	Orange County Water District	July 9, 2015	2-3
A2	Orange County Public Works	July 9, 2015	2-11
A3	Airport Land Use Commission for Orange County	July 10, 2015	2-17
A4	The Metropolitan Water District of Southern California	July 10, 2015	2-21
A5	California Department of Transportation	July 14, 2015	2-25
A6	California Cultural Resource Preservation Alliance	June 12, 2015	2-35
A7	The PRC Group	July 13, 2015	2-39
A8	Gabrieleno Band of Mission Indians – Kizh Nation	July 7, 2015	2-47
A9	Southern California Regional Rail Authority	July 13, 2015	2-53

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2. Response to Comments

LETTER A1 – Orange County Water District (5 page[s])

<p><small>DIRECTORS</small> PHILIP L. ANTHONY DENIS R. BILODEAU, P.E. SHAWN DEWANE JAN M. FLORY CATHY GREEN DINA NGUYEN RODMAN A. REYNA STEPHEN R. SHELDON HARRY S. SIDHU, P.E. ROGER C. YOH, P.E.</p>	 <p>ORANGE COUNTY WATER DISTRICT <small>ORANGE COUNTY'S GROUNDWATER AUTHORITY</small></p>	<p>A1</p> <p><small>OFFICERS</small> President CATHY GREEN First Vice President DENIS R. BILODEAU, P.E. Second Vice President PHILIP L. ANTHONY General Manager MICHAEL R. MARKUS, P.E., D.WRE</p>
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July 9, 2015

Ms. Susan Kim
Acting Principal Planner
City of Anaheim
Planning Department
200 South Anaheim Boulevard
Anaheim, CA 92805

RE: *Draft Environmental Impact Report No. 348 for the Anaheim Canyon Specific Plan, SCH No. 2013101087 and Anaheim Canyon Specific Plan Revised Public Draft, May 2015*

Dear Ms. Kim:

The Orange County Water District (OCWD, the District) appreciates the opportunity to review and comment on the Draft EIR for the Anaheim Canyon Specific Plan and the Anaheim Specific Plan Revised Public Draft. We understand that the proposed project involves changes to the Anaheim Canyon Specific Plan which includes property owned by OCWD. OCWD's property within the project area includes Warner, Little Warner, Conrock, Foster-Huckleberry, Kraemer and Miraloma Basins; Anaheim Lake; Mini-Anaheim Lake; and portions of the Santa Ana River and the Off-River Channel, as well as Miller Basin, which is owned by Orange County Flood Control District and operated by OCWD as a groundwater recharge basin.

The District would like to thank City of Anaheim staffs for taking the time to meet with OCWD to discuss the potential impacts of the project on OCWD properties and operations and for the city's willingness to address OCWD's concerns. These concerns were summarized in a letter to the city dated October 7, 2014.

Please accept the following comments on the Anaheim Canyon Specific Plan Revised Public Draft, May 2015: (underlined text to be added and crossed-out text to be deleted).

Page 53: Change the caption on the photo to either indicate that the Groundwater Replenishment System is a joint project of OCWD and the Orange County Sanitation District or just remove the reference to OCSD.

Page 80: DA-6 Open Space/Water Area

A1-1

PO Box 8300 Fountain Valley, CA 92728-8300	18700 Ward Street Fountain Valley, CA 92708	(714) 378-3200 (714) 378-3373 fax	www.ocwd.com
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Please include in the description of DA-6: Open Space/Water Area that there are certain non-open space or water uses allowed within this development area. OCWD stated in a letter to the City of Anaheim dated October 7, 2014 that OCWD is supportive of the changes to the General Plan and Zoning changes proposed in the Anaheim Canyon Specific Plan and the City's General Plan with the condition that the language specifically includes a statement that the Open Space/Water zoning and land use designation will allow various non-water development uses by right or by CUP without a change to the Specific Plan or General Plan.

A1-1

We also acknowledge that section .060 Open Space/Water Area (DA-6) on page 4 of Appendix B references that certain non-open space or water uses are allowed within the DA-6 development area. We understand that these certain uses include but are not limited to Industry, Industry-Heavy, Recreation-Commercial Outdoor, Recycling Services-Processing, Research and Development, Restaurants, Retail Sales-Outdoor, Utilities, Veterinary Services, Warehousing and Storage-Enclosed and Wholesaling.

Please accept the following comments on the Anaheim Canyon Specific Plan Draft EIR as explained below.

OCWD appreciates the city's interest in cooperative efforts as stated in the goals and policies described below.

- Goal 16.1, Policy 7 (page 5.8-8): improving landscaping along the edge of the river
- Goal 16.1, Policy 8 (page 5.8-8): expanding the development potential of OCWD's recharge basins
- Goal 4.1, Policy 2 (page 5.8-13): maintaining and improving the recreational and scenic resources of Anaheim Lake, Five Coves, and other recharge basins
- Policy OSC-12 (page 5.8-21) providing for the potential need for improvements to the Groundwater Replenishment System pipeline and the statement in support for OCWD's operations within the project area
- Water Action Plan Policy WA-12 (page 5.8-21) improving the landscaping around OCWD's recharge basins
- Water Action Plan Policy WA-15 (page 5.8-22) coordinating with OCWD to expand recycled water supply and delivery to interested businesses
- OCWD Recycled Water Coordination I.5 (page 5.15-26) coordinating with OCWD to identify ways to increase recycled water usage in Anaheim Canyon

Two potential projects are described on page 5.13-4. The Metrolink Station Connection would increase bicycle and pedestrian mobility between the Metrolink Station and the Santa Ana River trail that includes a bridge across the Santa Ana River and an undercrossing beneath Tustin Avenue. The Waterway Trail Connection includes developing additional off-road trail connections through select OCWD areas to the Santa Ana River Trail. Since both of these

A1-2

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projects have potential to impact District property and operations, OCWD requests to be consulted and involved as plans for the projects are developed. There are several sections of the DEIR where OCWD recharge basins are referred to as "Santa Ana River lakes." Please correctly identify the water bodies that are within the project boundaries including making the following corrections to provide the correct references to the water bodies being described (underlined text to be added and crossed-out text to be deleted).

A1-2

A1-3

- Page 5.3-4 Open Space/Water:
These include the Santa Ana River wash, its river banks, and adjoining... including Santa Ana River lakes, Warner Basin, Little Warner Basin, Conrock Basin, Huckleberry Basin, Kraemer Basin, Miraloma Basin, and Anaheim Lake.
- Page 5.3-7 Biological Resources:
The Project Area contains several OCWD groundwater recharge basins, including the Kraemer Basin, Miller Basin, Warner Basin, Santa Ana River Lakes, Little Warner Basin, Conrock Basin, Huckleberry Basin, and Anaheim Lake and other smaller basins...The Santa Ana River Lakes, Corona Lake, and Anaheim Lake Warner Basin provides recreational uses to local fishermen. These basins are The basin is stocked with fish...and are open for public use with a fee.
- Page 5.3-11, Section 5.3.2.3 Jurisdictional Waters and Wetlands
The Santa Ana River and the OCWD groundwater recharge basins, including the Santa Ana River Lakes, Anaheim Lake, Warner Basin, Kraemer Basin, and others within the Project Area contain jurisdictional waters and wetlands.
- Page 5.8-21, Policy WA-13: The Project Area contains riparian vegetation and wetlands in the Santa Ana River and lakes areas and in the vicinity of recharge basins. The Santa Ana River lakes, Warner Basin, Little Warner Basin, Conrock Basin, Huckleberry Basin, Kraemer Basin, and Anaheim Lake contain open water habitat that is used by migratory and resident waterfowl and other bird species, principally for foraging. These areas would remain as Open Space/Water under the ACSP but with increased use and access.
- Page 5.13-3 first paragraph:
Several water basins along the Santa Ana River are used for recreation purposes: Anaheim Lake, Warner Basin, and the Miller Retarding Basin and the Five Coves areas Burris Basin, which is located north of Ball Road along the western side of the River outside of the specific planning area.

Additional suggested corrections include the following:

- Page 5.7-9 Groundwater
The Project Area lies in within the boundaries of the Orange County Groundwater Basin, which underlies the northern half of Orange County...

A1-4

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The water supply system also includes... the Groundwater Replenishment System, and the Prado wetlands and Prado Dam located in San Bernardino County and Riverside County, respectively.

- Page 5.13-3 Environmental Impacts:

In addition to the groundwater recharge activities, implementation of the ACSP would encourage the creation of bicycle and pedestrian trails...

Basin Turf Conversion: This project would convert... and Water Warner Basin.

Please consider the following suggested changes to the description of the water supply system in Section 5.

- Page 5.15-13: Water Supply System, *Groundwater*

(first paragraph, beginning with third sentence) The basin holds millions of acre-feet (AF) of water, of which about 1.25 to 1.5 million AF is available for use approximately 300,000 AF is available for production on an annual basis... The basin generally operates as a reservoir and the net amount of water stored is increased in wet years to allow for manageable overdrafts in dry years with water levels maintained within an operating range to assure long-term basin sustainability... The production capability of the basin has increased as a result of increased wastewater reclamation and the blending of waters of different qualities a managed aquifer recharge program to produce provide high-quality potable water for public distribution... The WSA indicates that the basin is one of the most plentiful sources of largest groundwater basins in the entire state, containing approximately 1.25 to 1.5 million AF of water available for use at the present time, and millions of acre-feet that could possibly be produced in the future. Although the volume of water in storage is large, annual production must be managed at levels that assure long-term basin sustainability. The basin is managed by OCWD, a special district created by the State Legislature. Though all pumpers within the basin are permitted to pump from it OCWD is charged with managing the groundwater basin largely through the Basin Production Percentage (BPP) that it established each water year. Although there are no limits to pumping from the basin, OCWD sets a target level of pumping from the basin, referred to as the Basin Production Percentage (BPP).

- Page 5.15-14: Water Supply System, *Groundwater*

(first paragraph) The BPP is set annually based on groundwater conditions, availability of imported water supplies, estimated amount of recharge supplies ideal precipitation, Santa Ana River runoff, and basin management objectives. In essence, the BPP is the set percentage all pumpers in the basin can pump without paying a high "pumping tax" an additional assessment or Basin Equity Assessment (BEA) to OCWD.

A1-4

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(third paragraph) Total water demand in OCWD... to prevent seawater intrusion for occurring in areas of the groundwater basin adjacent to the Pacific Ocean in ~~Huntington Beach, Costa Mesa, and Fountain Valley.~~

A1-4

(fourth paragraph) ~~Based on the groundwater basin conditions... during the ensuring water year, beginning July 1, 2014.~~

- Page 5.15-15: Recycled Water

Anaheim indirectly participates in regional water recycling through the Groundwater Replenishment System (GWRS) by a joint project of the OCWD and Orange County Sanitation District operated by OCWD.

Thank you again for the opportunity to submit these comments.

Sincerely,



Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE
General Manager

2. Response to Comments

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2. Response to Comments

A1. Response to Comments from Michael R. Markus, P.E., D. WRE, BCEE, F. ASCE, dated July 9, 2015.

- A1-1 Comments are related to the Anaheim Canyon Specific Plan Revised Public Draft and not to the DEIR. However, the City of Anaheim is in agreement with your suggested changes and they will be incorporated into the Specific Plan prior to adoption.
- A1-2 Comment noted. As suggested by the comment, where Metrolink Station Connection and Waterway Trail Connection projects as described in page 5.13-4 of the DEIR have potential for impact OCWD properties, the City will consult and involve OCWD during planning process.
- A1-3 Comment noted. The DEIR has been revised to reflect the correct references to the water bodies including pages 5.3-4, 5.3-7, 5.3-11, 5.8-21, and 5.13-3. Revisions to the description of the water bodies would not change the conclusion of the DEIR analysis. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A1-4 Comment noted. The DEIR has been revised to reflect the correct references to the groundwater and water supply systems including pages 5.7-9, 5.13-3, 5.15-13, 5.15-14, and 5.15-15. Revisions to the description of the groundwater and water supply systems would not change the conclusion of the DEIR analysis. Please refer to Chapter 3, *Revisions to the Draft EIR*.


2. Response to Comments

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2. Response to Comments

LETTER A2– Orange County Public Works (3 page[s])

A2



OC Public Works
Integrity, Accountability, Service, Trust
Shane L. Silsby, Director



July 9, 2015

RECEIVED

NCL-13-053

Ms. Susan Kim, Principal Planner
City of Anaheim, Planning Department
200 South Anaheim Boulevard
Anaheim, California 92805

JUL 16 2015

CITY OF ANAHEIM
PLANNING DEPARTMENT

Subject: Recirculated Notice of Availability of Draft Environmental Impact Report No. 348 for the Anaheim Canyon Specific Plan

Dear Ms. Kim:

The County of Orange has reviewed the Recirculated Notice of Availability of Draft Environmental Impact Report No. 348 for the Anaheim Canyon Specific Plan and offers the following comments:

Flood Programs:

1. Figure 5.7-1 shows the existing storm drain system in the Project Area. It appears that westernmost part of the Project Area is either tributary to Carbon Creek Channel (OCFCD Facility No. B01) or Chantilly Storm Channel (OCFCD Facility No. E01S02). These channels may be deficient or may contain deficient segments. As mentioned in one of our comments on the NOP for the project, the DEIR should identify all OCFCD facilities that will potentially be impacted by the project. A2-1
2. While improvements to the drainage system might improve conditions within the Project Area, if downstream facilities remain deficient, the flooding potential might be shifted elsewhere or be worsened in areas outside the Project Area. Improvements to local drainage facilities which have the potential to deliver more flows and affect OCFCD's facilities will require appropriate analyses and mitigation (if required) of potential impacts by the City of Anaheim (City) in consultation with the Manager, OCPW/Infrastructure Programs. A2-2
3. Since the City is responsible for land use planning and development within City limits, the City should review and approve all local hydrology and hydraulic analyses including the needed 100-year flood protection for proposed developments within the Project Area. Proposed flood protection measures should not worsen existing conditions or shift flooding problems downstream or upstream of proposed developments. A2-3

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2. Response to Comments

4. Page 5.7-6, Section ACSP Area Drainage:
- a. First paragraph, third line: Please change "OC Flood" to "OCFCD". OCPW/Operations and Maintenance (O&M), maintains flood control facilities owned by OCFCD and the County of Orange. | A2-4
 - b. Second paragraph: The DEIR indicates that the Drainage Master Plans that include the rest of the Project Area are currently being developed following OC Flood's publication of new hydrologic parameters, which resulted in greater runoff projections than previously estimated. We are not aware of any publication of new hydrologic parameters by OC Flood other than those contained in the current Orange County Hydrology Manual (OCHM), its Addendum 1, and the County of Orange Local Drainage Manual. Please clarify the text. | A2-5
 - c. First bullet point: OCFCD Facility No. E03 is Carbon Canyon [not Carbon Creek (OCFCD Facility No. B01)] Channel. Please change "Canyon" to "Creek". | A2-6
 - d. Last paragraph states "The Carbon Creek Channel and Atwood Channel discharge into the Miller Retarding Basin..." Carbon Canyon Channel and Atwood Channel (OCFCD Facility No. E04) discharge into the Miller Retarding Basin (OCFCD Facility No. E02B01). Carbon Creek Channel (OCFCD Facility No. B01) is an earthen channel that abuts E02B01 to the north and runs through the northernmost western part of the Project Area. Please revise the text as appropriate. | A2-7
5. Any work within OCFCD's right-of-way will require encroachment permits from the County's Public Property Permit Section. In addition, all work within OCFCD right-of-way should be performed in a manner that will not adversely impact OCFCD facilities. | A2-8
- If you have any questions or need clarification please do not hesitate to contact Editha Llanes at (714) 647-3985.

Environmental Resources:

- 1. Section 3.4, Intended Uses of the EIR (page 3-27): The first sentence in this section incorrectly states that the Draft EIR examines the environmental impacts of the "proposed residential project." The proposed project is not a residential project; it is the consolidation of two separate specific plans and the Scenic Corridor Overlay Zone into one new Specific Plan, the Anaheim Canyon Specific Plan. This sentence needs to be corrected to reference the correct project. | A2-9
- 2. Section 5.7, Hydrology and Water Quality (page 5.7-1): The seventh bullet in the list incorrectly labels the Guidance Document. This reference should read the "Technical Guidance Document," not the "Supplemental Guidance Document." | A2-10
- 3. Section 5.7, Hydrology and Water Quality (page 5.7-1): The eighth bullet in the list incorrectly labels the Drainage Area Management Plan. This reference should read the "Orange County Drainage Area Management Plan," not the "Orange County Flood Control District Drainage Area Management Plan." | A2-11

2. Response to Comments

4. Section 5.7.6, Level of Significance before Mitigation (page 5.7-23): The sentence contains a typo. The sections referenced should be 5.7-1 through 5.7-5, not 5.7-1 through 5.7-6. | A2-12

If you have any questions or need clarification please do not hesitate to contact Jennifer Shook at (714)955-0671.

Sincerely,



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

cc: Mehdi Sobhani, Manager, OC Public Works/Flood Programs
Chris Crompton, Manager, OC Public Works/Environmental Resources

2. Response to Comments

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2. Response to Comments

A2. Response to Comments Laree Brommer, Manager, Planning Division, OC Public Works Service Area/OC Development Services, dated July 9, 2015.

- A2-1 Comment noted. Page 5.7-6 of the DEIR was revised to add Chantilly Storm Channel to the list of Orange County Flood Control District (OCFCD) channels within or tributary to the Project Area and the facility number for Carbon Creek Channel was corrected. The revisions would not change the conclusion of the DEIR. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-2 Comment noted. Text was added to page 5.7-6 and page 5.7-18 of the DEIR to acknowledge that improvements to local drainage facilities that may impact OCFCD facilities shall be analyzed by the City and Manager of the OC Public Works/Infrastructure Program. The revisions would not change the conclusion of the DEIR. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-3 Comment noted. Text was added to page 5.7-17 of the DEIR to address the City's review of hydrology and hydraulic analyses and measures to minimize potential impacts to OCFCD facilities. The revisions would not change the conclusion of the DEIR. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-4 Comment noted. Change from OC Flood to OCFCD has been made. The statement that Orange County Public Works/Operations and Maintenance (O&M) maintains the flood control facilities owned by OCFCD has been added to page 5.7-6 of the DEIR. The revisions would not change the conclusion of the DEIR. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-5 Comment noted. The text on page 5.7-6 of the DEIR has been edited in accordance with the commenter's suggestion and reference to new hydrologic parameters has been removed. The revisions would not change the conclusion of the DEIR. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-6 Comment noted. The change to Carbon Canyon Channel (E03) has been made on page 5.7-6 of the DEIR. The revision would not change the conclusion of the DEIR. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-7 Comment noted. Page 5.7-6 of the DEIR was revised to reference correct stormwater facilities as stated by the comment. The revision would not change the conclusion of the DEIR. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-8 Comment noted. A statement about encroachment permits has been added to page 5.7-6 of the DEIR. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-9 Comment is noted and the text has been revised on page 3-27 of the DEIR. The revision would not change the conclusion of the DEIR analysis. Please refer to Chapter 3, *Revisions to the Draft EIR*.

2. Response to Comments

- A2-10 Comment is noted and the text has been revised on page 5.7-1 of the DEIR. The revision would not change the conclusion of the DIER analysis. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-11 Comment is noted and the text has been revised on page 5.7-1 of the DEIR. The revision would not change the conclusion of the DIER analysis. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A2-12 Page 5.7-23 correctly identified less than significant impacts related to Impact 5.7-1 through 5.7-6 and does not contain a typo as stated by the comment. No response is necessary.

2. Response to Comments

LETTER A3 – Airport Land Use Commission for Orange County (2 page[s])

A3



AIRPORT LAND USE COMMISSION

FOR ORANGE COUNTY

3160 Airway Avenue • Costa Mesa, California 92626 • 949.252.5170 fax: 949.252.6012

July 10, 2015

Susan Kim, Acting Principal Planner
City of Anaheim Planning Department
200 S. Anaheim Boulevard, Suite 162
Anaheim, CA 92805

Subject: NOA of DEIR No. 348 for Anaheim Canyon Specific Plan

Dear Ms. Kim:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Anaheim Canyon Specific Plan Project. The proposed project area is not located within the Noise Impact Zones, Clear Zone, or Height Restriction Zone for Fullerton Municipal Airport (FMA) or Joint Forces Training Base Los Alamitos. Therefore, Airport Land Use Commission (ALUC) for Orange County has no comment on the DEIR related to land use, noise or safety compatibility with the *Airport Environs Land Use Plan (AELUP) for FMA or Joint Forces Training Base, Los Alamitos*.

The Anaheim Canyon Specific Plan would update and consolidate two specific plans (the Northeast Area Specific Plan and the PacifiCenter Anaheim Specific Plan) and the Scenic Corridor Overlay Zone, as it relates to Anaheim Canyon, into one new specific plan.

Although the proposed development is located outside of the Airport Planning Areas, please be aware that development proposals which include the construction or alteration of a structure more than 200 feet above ground level, require filing with the Federal Aviation Administration (FAA). Structures meeting this threshold must comply with procedures provided by Federal and State law, with the referral requirements of ALUC, and with all conditions of approval imposed or recommended by the FAA and ALUC including filing a Notice of Proposed Construction or Alteration (FAA Form 7460-1).

A3-1

The DEIR should also address the heliports within the City of Anaheim. For your information, should the development of heliports occur within your jurisdiction, proposals to develop new heliports must be submitted through the City to the ALUC for review and action pursuant to Public Utilities Code Section 21661.5. Proposed heliport projects must comply fully with the state permit procedure provided by law and with all conditions of approval imposed or recommended by FAA, by the ALUC for Orange County and by Caltrans/Division of Aeronautics.

A3-2

2. Response to Comments

ALUC Comments on DEIR No. 348
7/10/15
Page 2

Thank you again for the opportunity to comment on this DEIR. Please contact Lea Choum at (949) 252-5123 or via email at lchoum@ocair.com should you have any questions related to the Airport Land Use Commission for Orange County.

Sincerely,



Kari A. Rigoni
Executive Officer

2. Response to Comments

A3. Response to Comments from Kari A. Rigoni, Executive Officer, dated July 10, 2015.

- A3-1 The comment indicates that development proposals which include the construction or alteration of a structure more than 200 feet above ground level require filing with the Federal Aviation Administration. The maximum structural height allowed under the ACSP is 100 feet in DA 3. Maximum height for DA 1, DA 2, DA 4, and DA 5 are 60 feet, and 30 feet for DA 6. Therefore, no impact would occur. Furthermore, the construction or alteration of any structure meeting this threshold in the future will comply with procedures provided by Federal and State law, with the referral requirements of ALUC as commented.
- A3-2 Project's potential impacts to area heliports were discussed in Chapter 5.6, Hazardous and Hazardous Materials, Impact 5.6-3. Development of helipads and heliports are permitted in DA 1 and DA 2, and conditionally permitted in DA 5. As stated in the comment, development of helipads or heliports would be submitted through the City to the ALUC for review and action pursuant to Public Utilities Code Section 21661.5. Proposed heliports or helipads projects will be required comply with the state permit procedure and conditions of approval imposed or recommended by FAA, by the ALUS for Orange County and by Caltrans/Division of Aeronautics.

2. Response to Comments

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2. Response to Comments

LETTER A4 – Metropolitan Water District of Southern California (2 page[s])

A4



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

July 10, 2015

Via Electronic and Regular Mail

Ms. Susan Kim, AICP
Anaheim Planning Department
200 S. Anaheim Boulevard, MS162
Anaheim, CA 92805

Dear Ms. Allen:

Notice of Availability of Draft Specific Plan and Environmental Impact Report for the Anaheim Canyon Specific Plan Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Availability of Draft Specific Plan and Environmental Impact Report (DEIR) for the Anaheim Canyon Specific Plan project (Project) in Anaheim, California. The Project would update and consolidate two existing specific plans (the Northeast Area Specific Plan and the PacificCenter Anaheim Specific Plan) and the Scenic Corridor Overlay Zone, as it relates to Anaheim Canyon, into one plan. The Project would allow for the redevelopment of existing uses resulting in approximately 47 million square feet of non-residential land use and 2,919 dwelling units. At buildout, the Project would result in an additional 19.6 million square feet of non-residential building area and 2,607 dwelling units. This letter contains Metropolitan's comments to the proposed project as a potentially affected public agency.

The DEIR states on page 5.15-15 that MWD feeders in Anaheim include the East Orange County Feeder No. 2, Orange County Feeder, Second Lower Feeder, West Orange County Feeder, Allen-McColloch Pipeline, and Santiago Lateral. However, the East Orange County Feeder 1, which follows a north to southwest alignment terminating within the Project boundary at Anaheim Lake, is not listed. Although each of these pipelines is depicted on Figure 5.15-2, they should be labeled and cited in the legend as MWD Pipelines rather than as "MND Mains." This section of the DEIR should also clarify which of these pipelines are within the proposed project boundary. Finally, as water supply storage is a function of time and bound by operational considerations, we recommend that the sentence under Current Drought on page 5.5-16 of the DEIR stating that Metropolitan has up to two years of supply in storage be deleted.

A4-1

In order to avoid potential conflicts with Metropolitan's facilities, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review. Thus, any future design plans associated with the proposed Project should be submitted to the attention of Metropolitan's Substructures Team. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mwdh2o.com. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have

A4-2

2. Response to Comments

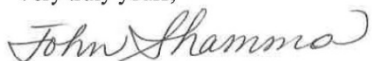
Ms. Susan Kim
Page 2
July 10, 2015

enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

A4-2

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation on this project. For further assistance, please contact Mr. Alex Marks at (213) 217-7629.

Very truly yours,



for Deborah Drezner
Interim Team Manager, Environmental Planning Team

AM/am
EPT Job #20150621EXT

Enclosures: Planning Guidelines

cc: K. Callanan

2. Response to Comments

A4. **Response to Comments from Deborah Drezner, Interim Team Manager, Environmental Planning Team, dated July 10, 2015.**

- A4-1 Comments noted. Page 5.15-15 of the DEIR has been revised to include the East Orange County Feeder No. 1. Figure 5.15-2, *Anaheim Public Utilities Major Facilities & Service Area*, has been revised to state “MWD Pipelines” instead of “MND Mains” and the revised figure shows the MWD pipelines within the Project Area. Page 5.15-16 of the DEIR has been revised to delete statement related to Metropolitan’s water supply capacity. The revisions would not change the conclusion of the DEIR analysis. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A4-2 Comment noted. As required, any projects in the area of Metropolitan’s pipelines or facilities will be submitted for Metropolitan’s review to the attention of Metropolitan’s Substructures Team.

2. Response to Comments

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2. Response to Comments

LETTER A5 – California Department of Transportation (6 page[s])

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

A5

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
3347 MICHELSON DRIVE, SUITE 100
IRVINE, CA 92612-8894
PHONE (949) 724-2086
FAX (949) 724-2592
TTY 711
www.dot.ca.gov



Serious drought.
Help save water!

July 14, 2015

Ms. Susan Kim
City of Anaheim
Planning Department
200 South Anaheim Blvd.
Anaheim, CA 92805

File: IGR/CEQA
SCH#: 2013101087
Log #: 3528B Revised
SR-55/91/57/90

Dear Ms. Kim:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed **Anaheim Canyon Specific Plan (ACSP) Draft Environmental Impact Report (DEIR)** - SCH #2013101087. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Caltrans Local Development-Intergovernmental Review (LD-IGR) program reviews impacts of local development to the transportation system, including the State Highway System. Caltrans works to ensure that local land use planning and development decisions include the provision of transportation choices, including transit, intercity rail passenger service, and air service, walking and biking, when appropriate.

The Anaheim Canyon Specific Plan would update and consolidate two specific plans (the Northeast Area Specific Plan and the PacificCenter Anaheim Specific Plan) and the Scenic Corridor Overlay Zone, as it relates to Anaheim Canyon, into one new specific plan. If all of the properties within the Anaheim Canyon were to be developed in accordance with the proposed specific plan, the maximum development intensity at build-out would include approximately 47 million square feet of non-residential uses and 2,919 dwelling units. This would allow for the increase of approximately 19,577,470 square feet of non-residential, and 2,607 residential dwelling units. All of the proposed residential units would be located within Development Area 3 (Transit Oriented). The ACSP is in proximity to State Route 55 (SR-55), SR-91, SR-57, and SR-90/Imperial Highway. **Caltrans is a responsible agency** on this project, and has the following comments:

A5-1

1) The Anaheim Canyon Specific Plan (ACSP) DEIR proposes constructing/modifying bikeways and trails. Any construction and/or modification to bikeways that would take place within Caltrans Right-of-Way (R/W) should comply with Caltrans Standards. Please continue to coordinate with Caltrans on bikeway and trail plans.

A5-2

2) The DEIR proposes implementation of Transportation Demand Management (TDM) programs through *Mitigation Measure T-1*, and ACSP Implementation Action Plan *MA.4*:

A5-3

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2. Response to Comments

Ms. Kim, City of Anaheim
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- TDM Strategy.* Each development that implements T-1 and MA.4 within the ACSP should also address funding of specific TDM program strategies and elements. A5-3 cont'd
- 3) Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the CEQA and National Environmental Policy Act (NEPA) standards. The DEIR repeatedly discusses, with some wording variations, in the *Traffic and Transportation Section 5.14* on Pages 89, 93, 96, and 107 that “While Caltrans has recognized that private development has a role to play in funding fair share improvements ... neither Caltrans nor the State has adopted a program that can ensure that locally-contributed impact fees will be tied to improvements to freeway mainlines ...” and that because “...Caltrans has exclusive control over state highway improvements, ensuring that developer fair share contributions to mainline improvements are actually part of a program tied to implementation of mitigation is within the jurisdiction of Caltrans...” Actually, the City can ensure that fair share fees are collected for impacts to State facilities related to developments within this Specific Plan, which could be later used to mitigate only this project’s impacts. Caltrans has adopted the practice of requesting fair share mitigation for significant impacts to the State Highway System and is willing to work with the City and/or OCTA to achieve this. A5-4
- 4) Mitigation conditioned as part of a local agency’s development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement. A5-5
- 5) Mitigation identified in the traffic analysis, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any “fair share” monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts. Please calculate and identify fair share contributions for all cumulative impacts on Caltrans facilities. Refer to Appendix B of the Caltrans Traffic Impact Study (TIS) Guidelines for methodology to calculate fair share contribution. http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf A5-6
- 6) The Freeway segments and ramps specifically identified in the Traffic and Transportation section of the DEIR that are expected to experience worse Level of Service (LOS) than the existing condition and should be mitigated are as follows: A5-7
- Existing 2013 Plus Project: SR-91 Westbound (WB) at Lakeview Ave. Off-ramp – AM Peak Hour

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2. Response to Comments

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- | | |
|---|----------------|
| <ul style="list-style-type: none"> • General Plan Buildout 2040 with Project: SR-57 Southbound: Orangethorpe Ave On-Ramp to SR 91 EB/WB Off-Ramps – AM/PM Peak Hours | A5-7
cont'd |
| <p>7) Mitigation measures for proposed intersection modifications within Caltrans' Right of Way (R/W) are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy; therefore, please refer to the policy for more information and requirements. http://www.dot.ca.gov/hq/traffops/policy/13-02.pdf</p> | A5-8 |
| <p>8) The DEIR Chapter 5.14 Transportation Section, 5.14.3 Environmental Impacts on page 38 identifies the ACSP Implementation Action Plan which includes <i>MR.6: Riverside Freeway (SR-91) Bridge improvements</i> to widen bridges at Lakeview Ave, Imperial Highway, and Yorba Linda Boulevard/Weir Canyon Road. All wheelchair ramps on Imperial Highway should be constructed to the latest Caltrans ADA standard. The wheelchair ramps should be provided across curbs that are constructed and/or replaced at pedestrian crosswalks. All construction must be in conformance with Americans with Disabilities Act (ADA) requirements. Please refer to Design Information Bulletin (DIB) 82-02 <i>Pedestrian Accessibility Guidelines for Highway Projects</i> http://www.dot.ca.gov/hq/oppd/dib/dib82-05.pdf</p> | A5-9 |
| <p>9) Please correct the California Agency name in the DEIR on Page 5.14-107 from "California Business, Transportation, and Housing Agency" to <i>California State Transportation Agency</i>. http://www.calsta.ca.gov/About_Us.htm</p> | A5-10 |
| <p>10) Please correct the "Action" in the DEIR on Page 3-28 under <i>Responsible Agencies</i> table for Caltrans from "Provide necessary roadway improvements" to <i>Issue Encroachment Permit for any work in State highway right-of-way to implement the project</i>.</p> | A5-11 |
| <p>Traffic Impact Analysis (TIS), dated September 9, 2014:</p> | |
| <p>11) The ACSP at build-out proposes an increase of 8 million square feet of industrial, 1 million square feet of general commercial, 2,600 dwelling units, etc. The ACSP traffic study <u>does not</u> include trip generation estimates for the proposed developments that will be implemented by this Specific Plan. According to Caltrans current TIS Guidelines, a project (Specific Plan) like this should include "Proposed Project Only with Select Zone Analysis - Trip generation and assignment for build-out of general plan". Please provide an estimate of trip generation for this Specific Plan.</p> | A5-12 |
| <p>12) The TIS states on page G-16 and G-41 that "All stop-controlled Study Area intersections and signalized intersections under Caltrans' jurisdiction were analyzed using the Highway Capacity Manual 2000 (HCM 2000) methodology." Please use the most current edition of</p> | A5-13 |

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2. Response to Comments

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- | | |
|---|-------------------------|
| <p>the HCM 2010 methodology for intersections within Caltrans R/W. Please update the TIS with this information, and resubmit to Caltrans for review.</p> | <p>A5-13
cont'd</p> |
| <p>13) The TIS on page G-74 and G-123 recommends the signalization of the Kraemer Blvd. and SR-91 EB ramps intersection. The SR-91 ramps on Kraemer Blvd. will be a major access route to/from the ACSP. The project traffic analysis should include the amount of fair share contribution from the ACSP for the signalization project.</p> | <p>A5-14</p> |
| <p>14) The TIS on page G-46 and G-77 recommends the widening of SR-91 Off-ramp to Lakeview Ave. This ramp will be adversely impacted by the ACSP as presented in the traffic analysis. The project traffic analysis should include the amount of fair share contribution from the ACSP for the widening project.</p> | <p>A5-15</p> |
| <p>15) Please clarify why the Peak Hour Volumes decrease on the "Plus Project" charts.</p> | <p>A5-16</p> |
| <p>16) The TIS should include a queue analysis of the on/off-ramps for Caltrans facilities using actual signal timing, not optimal (default) signal timing or queue analysis on Caltrans off-ramps and intersections, refer to the Highway Capacity Manual (HCM 2010) methodology, and utilize Highway Capacity Software (HCS) 2010. For queue/storage length analysis on Caltrans on-ramps, refer to the Caltrans Ramp Meter Design Manual (RMDM) methodology. Please update the TIS with this information, and resubmit to Caltrans for review.</p> | <p>A5-17</p> |
| <p>17) Development areas that will be expanded (such as industrial, recycling, etc.) will generate substantial truck volume. Please apply a reasonable truck volume increase factor in project traffic analysis, and resubmit to Caltrans for our review.</p> | <p>A5-18</p> |
| <p>18) Any hauling of construction materials should not occur during A.M. and P.M. peak periods of travel on State facilities during demolition and/or construction of the proposed project. All vehicle loads should be covered so that materials do not blow over or onto the Caltrans' R/W.</p> | <p>A5-19</p> |
| <p>Outdoor Advertising:</p> | |
| <p>19) Please submit draft plans to Caltrans District 12 for the proposed Anaheim Canyon Master Sign Plan for review and coordination.</p> | <p>A5-20</p> |
| <p>20) Any sign advertising a business not "on premise" will require an Outdoor Advertising Display Permit. Information on outdoor advertising may be obtained by contacting Raj Champaneri of Caltrans at 213-897-6123 or Raj.Champaneri@dot.ca.gov.</p> | <p>A5-21</p> |

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2. Response to Comments

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Encroachment Permit:

- 21) Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.
- a) This includes all landscape and irrigation improvements, which shall conform to Caltrans' policies for design construction and maintenance for those areas within Caltrans R/W. The local agency is responsible for requiring any additional highway planting called for by its community standards as part of any development approval. All planting designs are approved by the Caltrans District Landscape Architect. The permittee can obtain from Caltrans District Landscape Architect Caltrans' standard details, plant list, planting and irrigation standard specifications, and special provisions where applicable. Large trees must be located outside the "clear recovery" area, as described in the Highway Design Manual (HDM). Additional information regarding landscaping can be found in Caltrans Encroachment Permit Manual, and Project Development Procedures Manual, which are available on Caltrans website.
 - b) As part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits. Encroachment permit submittals that are incomplete can result in significant delays in permit approval.
 - c) Improvement plans for construction within State Highway R/W must include the appropriate engineering information consistent with the state code and signed and stamped by a professional engineer registered in the State of California. Caltrans Permit Manual contains a listing of typical information required for project plans. All design and construction must be in conformance with the Americans with Disabilities Act (ADA) requirements.
 - d) All work within the State R/W must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control, including production of a Water Pollution Control Program (WPCP) or Storm Water Pollution Prevention Plan (SWPPP) as required. Any runoff draining into Caltrans R/W from construction operations, or from the resulting project, must fully conform to the current discharge requirements of the Regional Water Quality Control Board to avoid impacting water quality.

A5-22

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2. Response to Comments

Ms. Kim, City of Anaheim
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Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (949) 724-7677. Early coordination with Caltrans is strongly advised for all encroachment permits.

http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment_permits_manual/index.html and <http://www.dot.ca.gov/hq/oppd/pdpm/pdpmn.htm>

A5-22
cont'd

22) Please schedule a meeting with Caltrans Planning and Traffic Operations with City staff to discuss transportation mitigation strategies for this Specific Plan by contacting Leila Carver at (949) 756-7827. This meeting should occur prior to the ACSP (project) approval.

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to call.

A5-23

Sincerely,



MAUREEN EL HARAQUE
Branch Chief, Regional-Community-Transit Planning
District 12

c: Scott Morgan, Governor's OPR State Clearinghouse

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2. Response to Comments

A5. Response to Comments from Maureen El Harake, Branch Chief, Regional-Community-Transit Planning, District, California Transportation Department, dated July 14, 2015.

- A5-1 Comment noted. No response is necessary.
- A5-2 Comment noted. The City will continue to coordinate with Caltrans on bikeway and trail plans within or adjacent to Caltrans right-of-way.
- A5-3 Mitigation measure T-1 is derived from the City's Municipal Code requirements for TDM programs. The Municipal Code places any funding requirements for TDM program implementation on future project applicants.
- A5-4 Comment noted. Direct and cumulative impacts to the State Highway System as a result of project implementation will be mitigated through implementation of Mitigation Measures T-5 and T-8 included in the DEIR.
- A5-5 Comment noted. Mitigation Measure T-8, subsection (f) requires fair share contributions to traffic mitigation for Caltrans facilities through a mutually acceptable agreement by Caltrans and the City of Anaheim.
- A5-6 See Response A5-4.
- A5-7 Comment noted. As noted in the DEIR, impacts have been identified at these locations and appropriate mitigation has been identified.
- A5-8 Comment noted. The City acknowledges that any intersection modifications with Caltrans right-of-way will be subject to the Caltrans Intersection Control Evaluation (ICE) policy. The following provision has been added to Mitigation Measure T-8:
- g) Future traffic improvement phasing analyses for Caltrans facilities shall utilize the latest adopted HCM methodology. In addition, proposed intersection modifications within Caltrans right-of-way shall be consistent with Caltrans Traffic Operations Policy Directive 13-02: Intersection Control Evaluation (ICE).
- A5-9 Comment noted. The City acknowledges that all construction within Caltrans right-of-way must be ADA compliant.
- A5-10 Per your request, the following change has been made to Page 5.14-107 of the DEIR:

Impact 5.14-3

State highway facilities within the study area are not within the jurisdiction of the City of Anaheim. Rather, those improvements are planned, funded, and constructed by the State of California through a legislative and political process involving the State Legislature; the California Transportation Commission (CTC); the California State

2. Response to Comments

~~Transportation Agency, Business, Transportation, and Housing Agency~~; the California Department of Transportation (Caltrans); and OCTA. Recent funding opportunities designated by OCTA's Renewed Measure M provide the vehicle for designated improvements on the freeway facilities within the study area and were analyzed at their recommended build-out in the ACSP.

A5-11 Per your request, the following change has been made to Page 3-28 of the DEIR:

Responsible Agencies	Action
Orange County Sanitation District (OCSD)	Approve necessary sewer upgrades to OCSD facilities.
California Department of Transportation (Caltrans)	<u>Coordinate with the City on any necessary roadway improvements to Caltrans facilities and issue any required encroachment permits within Caltrans right-of-way.</u> Provide necessary roadway improvements.

A5-12 "Proposed Project Only" trip generation for ACSP is shown in Table 1 to total an additional 156,596 average daily trips (ADT), using ITE 9th edition Trip Generation rates. It is important to note that these rates are based upon data collected for suburban, free-standing, single use development with no transit or active transportation. These assumptions are not consistent with the ACSP intentions for urban, mixed use development with facilitation of transit, pedestrian and bicycle activity. Nevertheless, application of ITE rates shows the existing General Plan (GP) 331,952 average daily traffic (ADT) increasing by 156,596 ADT.

Table 1. ITE 9th Edition Trip Generation

Area	Use	Daily Rate	Increase/Change				
			Existing GP	Trips/Day	Sq. Ft.	DU	Trips/Day
DA1	Industrial	6.97	21,770,629	151,741	8,229,962		57,363
DA2	Recycling	0.792	700,267	555	1,232,032		976
DA3	Transit Oriented	11.03	589,049	6,497	5,360,574		59,127
	Residential	4.18		-		2,607	10,897
DA4	Local Commercial	42.7	1,563,364	66,756	(310,091)		(13,241)
DA5	General Commercial	42.7	2,171,054	92,704	923,154		39,419
DA6	Open Space		10,571	-	3,568,351		-
DA7	Flex Area	12.44	1,101,222	13,699	165,231		2,055
			Existing GP ADT:	331,952	Increased ADT:		156,596

This growth compares to the 124,792 ADT growth forecast with the ATAM. Trip assignment was derived from ATAM through select zone analysis. It forecasts the following freeway traffic:

- SR91 traffic to/from the east is 7.0%, or 8,735 Project ADT.
- SR91 traffic to/from the west is 11.3%, or 14,101 Project ADT.

2. Response to Comments

- SR55 traffic to/from the south is 11.4%, or 14,226 Project ADT.
- SR57 traffic to/from the north is 4.6%, or 5,740 Project ADT.
- SR57 traffic to/from the south is 5.0%, or 6,240 Project ADT.
- SR90 traffic to/from the north is 3.8%, or 4,742 Project ADT.

The smart growth trip generation materials prepared by UC Davis were reviewed, as requested by Caltrans. One of its designers, Dr. Brian Bochner, was consulted regarding why this tool concluded that the ACSP land uses did not qualify for smart growth trip generation. He advised that both the 2,600 acre size of the project area and the significant industrial component of the ACSP precludes its recognition as smart growth by this tool.

A5-13 Per the City's meeting with Caltrans on July 29, 2015, use of HCM 2000 methodology will be allowed for use in the Program EIR. However, future traffic studies required in compliance with Mitigation Measure T-8 will utilize the latest HCM methodology. The following provision has been added to Mitigation Measure T-8:

g) Future traffic improvement phasing analyses for Caltrans facilities shall utilize the latest adopted HCM methodology. In addition, proposed intersection modifications within Caltrans right-of-way shall be consistent with Caltrans Traffic Operations Policy Directive 13-02: Intersection Control Evaluation (ICE).

A5-14 The ACSP fair share for signaling the SR91 eastbound off ramp at Kraemer Boulevard is 45.7% (based on year 2040 forecasts showing the ACSP adding 493 peak hour trips of the 1078 new peak hour trips). It should be noted that Measure M2 Project I fully funds the reconstruction of this interchange, which includes a new traffic signal at this ramp location.

A5-15 The ACSP fair share for widening the SR91 westbound off ramp to Lakeview Avenue is 31.3% (based on year 2040 forecasts showing the ACSP adding 68 peak hour trips of the 149 new peak hour trips). It should be noted that Measure M2 Project I includes the addition of a 1,400 foot long deceleration lane as part of the Lakeview Interchange reconstruction, which will also mitigate the deficient level of service at this off ramp.

A5-16 A significant area of the Anaheim Canyon Specific Plan had its General Plan designation changed from Low Office to Industrial. This change was made to reflect the zoning and type of developments that currently exist today, as well as reflect the industrial uses that are desired in this area. As a result of this change, the traffic generated from these areas will reduce under the General Plan Buildout with Project scenario compared to the without project scenario.

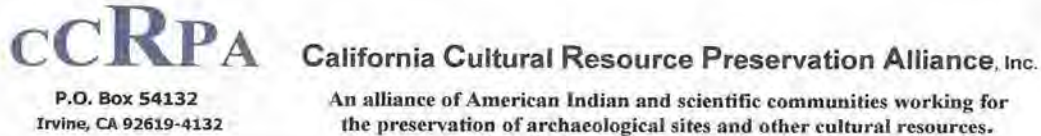
2. Response to Comments

- A5-17 It was agreed by Caltrans at our July 29, 2015 meeting that the requested queue analysis of on/off-ramps will be conducted as part of the SR91 PAED, with ACSP land uses included. The current analysis is acceptable for this DEIR.
- A5-18 It was agreed by Caltrans at our July 29, 2015 meeting that the recycling truck trips will consist of standard size waste collection vehicles, and that truck trips serving the flex area development will generally be UPS and FedEx types of vehicles. These sizes of trucks do not require a truck volume increase factor.
- A5-19 The City requires a construction operations plan for any construction projects within the City. No hauling of construction materials shall occur during AM and PM peak periods of travel on State facilities during demolition and/or reconstruction of the ACSP project. All vehicle loads shall be covered so that materials do not blow over or onto the Caltrans rights of way. No changes to the DEIR are necessary.
- A5-20 Comment noted. The Anaheim Canyon Master Sign Plan will be forwarded to Caltrans for review and coordination.
- A5-21 Off-site business advertising is not permitted by the proposed Specific Plan. No additional response is necessary.
- A5-22 The City acknowledges that any work performed within Caltrans right-of-way will require discretionary review and approval by Caltrans, as well as issuance of an encroachment permit by Caltrans prior to construction.
- A5-23 Per your request, a meeting between Caltrans and the City was conducted on July 29, 2015.

2. Response to Comments

LETTER A6 – California Cultural Resource Preservation Alliance (1 page[s])

A6



June 12, 2015

Susan Kim, Acting Principal Planner
City of Anaheim Planning Department

Dear Ms. Kim:

Thank you for the opportunity to review the Draft environmental Impact Report No. 348 and Notice of Planning Commission and City Council Public Hearings for Anaheim Canyon specific Plan.

We agree with the findings that the proposed project has a low potential for significant impacts on archaeological resources and human remains as the result of urban development. However, the potential is greater where development occurred prior to the passage of CEQA. In the event that cultural deposits are discovered during construction, we request that we be informed and that serious consideration be given to preservation measures, such as capping as described in California Code of Regulations 15126.4 (b) (3) (B). This is important because prehistoric archaeological sites hold special significance for Native American descendants and data recovery excavations cannot mitigate religious and cultural values.

A6-1

It is also possible in a project of this wide a scope that human remains may be discovered during construction. Therefore, Table 8-1 Impacts Found Not to Be Significant should include the statement that if human remains are discovered during excavations associated with this project, they will be subject to Section 7050.5 of the California Health and Safety Code.

A6-2

If you have any questions, please call or email at (949) 559-6490 and pmartz@calstatela.edu.

Sincerely,

Patricia Martz, Ph.D.
President

2. Response to Comments

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2. Response to Comments

A6. Response to Comments from Patricia Martz, Ph.D., President, California Cultural Resource Preservation Alliance, dated June 12, 2015.

A6-1 Comment noted. In the event that cultural deposits are discovered during construction, appropriate agencies will be notified and resources will be treated accordingly pursuant to California Code Regulations 15126.4 (b)(3)(B) so that no significant prehistoric archaeological resources are adversely impacted. Your comment will be forwarded to the appropriate City of Anaheim decision-makers for their review and consideration. No further response is necessary.

A6-2 Page 8-4 of the DEIR indicates that in the event that human remains are discovered within the project site, they will be subject to California Health and Safety Code Section 7050.5. No further response is necessary.

2. Response to Comments

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2. Response to Comments

LETTER A7 – The PRS Group (5 page[s])

A7



July 13, 2015

Mr. Jonathan Borrego
City Hall
200 South Anaheim Blvd.
Anaheim, CA 92805

RE: Anaheim Canyon Specific Plan DEIR – Comments

Dear Mr. Borrego:

We reviewed the Anaheim Canyon Specific Plan (ACSP) Draft Environmental Impact Report (DEIR). Please accept this letter as our comments to the draft document. Under separate cover we have provided comments to the draft Anaheim Canyon Specific Plan.

DEIR Minor/Typographical Errors:

The DEIR contained some minor typographical errors. For example, Figure 3-6 does not show the Scenic Corridor (SC) Overlay but the text refers to the figure and overlay. Also, the text states on page 96 that the SC Overlay covers the eastern half of the ACSP, but on page 98 it states that the SC Overlay covers the western half of the ACSP.

A7-1

DEIR Comments:

The one item that stood out is that Cultural Resources was found not to be significant and was dismissed in the DEIR. The Santa Ana River runs through the ACSP planning area and cultural sites are known to occur near waterways. The records searches, alluded to in the draft document, are not referenced. In addition, an inquiry sent to the Native American Heritage Commission (NAHC) for Sacred Lands would be typical to justify the conclusion that impacts are less than significant and do not warrant further analysis. Since this would require a General Plan Amendment, the City would also need to comply with SB 18 and conduct a tribal consultation (if this occurred, it is not referenced in the document).

A7-2

Proposed Residential Use/DEIR Alternative:

One of the alternatives analyzed in the DEIR was the "Increased Residential Use" Alternative. As noted in the DEIR, the Increased Residential Use Alternative is environmentally superior to the ACSP Proposed Project. In addition, as demonstrated above, increased residential uses support many of the stated goals of the ACSP.

A7-3

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Office 949 240-1322 Cell: 949 300-8619
phillip@prsgrp.biz

2. Response to Comments

As noted in the draft ACSP, the new document looks towards the future of the entire area. To achieve desired goals and objectives, a variety of strategies are proposed to implement the ACSP. Additional residential development is a key to achieving those goals.

A7-3

Among the ACSP strategies strongly supported by the new, correctly located residential developments are:

- Create an attractive and welcoming environment.
- Provide a range of uses, services, and amenities for workers, visitors, and residents.
- Maximize the range of building and site sizes, products, and types.
- Encourage transit-oriented commercial, office, and residential development adjacent to the Metrolink Station to take full advantage of commuter rail opportunities.
- Foster development that serves to reduce vehicle miles traveled by promoting alternatives to driving, such as walking, biking, and use of mass transit.
- Expand opportunities for additional high-density residential, office, and retail development within $\frac{1}{4}$ to $\frac{1}{2}$ mile of the Metrolink Station.
- Reduce commuter vehicle miles traveled (VMT) and the associated greenhouse gas emission.

We recognize that the DEIR residential alternative, although environmentally superior, does not completely address the needs of the city via the implementation of the ACSP. However, additional high density residential development, appropriately placed within the ACSP, will greatly assist in meeting all of the goals and objectives while reducing environmental impacts.

Please consider a DEIR alternative that includes additional high density residential development within DA-5. (Maximum 60 units/acre and maximum 4 stories in height)

Respectfully,

The PRS Group



Philip R. Schwartz

President

2. Response to Comments



July 13, 2015

Jonathan Borrego, Principal Planner
Planning Department – City Hall
200 South Anaheim Blvd.
Anaheim, CA 92805

RE: Comments on Anaheim Canyon draft Specific Plan

Dear Mr. Borrego:

Thank you for the opportunity to review and comment on the draft of the Anaheim Canyon Specific Plan (ACSP) and on the Draft Environmental Impact Report (DEIR)

As you know, this firm represents several property owners in the Canyon. We, and other professionals have carefully reviewed the draft ACSP and DEIR on their behalf.

As a follow up to our previous communications, please accept this letter, and our earlier correspondence, as our request for certain changes to the ACSP. Under separate cover we will offer our comments to the DEIR during the official review period.

The goals of the draft ACSP as stated, are ideal. We believe that the redevelopment of old buildings and therefore the reuse of certain land sites which are presently underutilized, offer a great opportunity for promoting new infill development.

One of the Canyon Area Advisory members owns a 51 year old building which sits on a 6.3 acre site which has frontage on the south boundary of La Palma Avenue and Carpenter Street. It is clear the age of the existing building will force consideration of a replacement scenario.

Other land uses near the La Palma/Carpenter site are commercial recreation, and across from La Palma/Carpenter site, on the north boundary of La Palma, are relatively new industrial complex buildings

In reviewing the ACSP it appears that the La Palma/Carpenter property is ideally suited to fulfill a portion of the new residential and retail commercial requirements noted in the

A7-4

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2. Response to Comments

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ACSP, as needed and necessary to sustain new high quality industrial and office development.

Only a very few properties within the ACSP have the physical characteristics required to deliver a highly functional, residential mixed use development.

History has shown that high quality, professionally managed apartment homes need economy of scale. Properties need to be large (240 units - 480 units) to achieve the efficiencies required in order to support professional on-site management, maintenance and deliver the amenities needed to attract a sustainable apartment community. Properties between 4 to 7 acres, which have access on two separate streets, fit the unique desired development criteria for multiple residential.

Many of the buildings in the ACSP area which sit on 4 to 7 acres are new, or relatively new, and therefore are uneconomical to redevelop. Other properties fitting the size requirements have valuable freeway exposure which is more desirable for commercial or office use.

The ACSP notes a great need for additional housing, retail services and local restaurants to accommodate the daily workforce in the ACSP area. Type V apartment homes are able to economically reach the marketplace and this is particularly true when the apartments are mixed use with commercial retail and restaurants.

The La Palma/Carpenter site is made even more attractive for potential mixed use - residential development when you see that it is within easy walking distance of the Kaiser Permanente Hospital and on further to the Anaheim Canyon Metrolink station. There is an existing OCTA bus stop at the La Palma/Carpenter site which facilitates that transit opportunity.

Kaiser Permanente has almost 2,000 employees at a 24 hour per day facility. Kaiser is continually expanding as evidenced by the new \$25,000,000 Cancer Office (radiation oncology building) as announced in October, 2013.

New ancillary medical buildings, with business which will service Kaiser, will add new jobs to the area and therefore will replace the many old, small lot industrial buildings which are very close to Kaiser Permanente. This process of old building reuse is underway. Kaiser will/has become the nucleus of change in the Anaheim Canyon and its incumbent on the City and property owners to proactively plan for the opportunity it brings to create a new node of complementary uses that include additional residential opportunities.

Pursuant to the State of California mandate, jobs in close proximity to housing will reduce traffic and consequently improve air quality. Of note, the Orange County Business Council published its 2015 report on the status of housing in Orange County. According

A7-4

2. Response to Comments

Page 3

July 15, 2015

to the report, new single family and multiple residential development in Orange County is not keeping up with job growth. The shortage of approximately 50,000 housing units will only increase in the coming years. The report says that in order for job rich Orange County to maintain its competitiveness, the pace of residential development needs to increase.

A7-4

We can expect new Federal and State Regulations to continually challenge older business practices. The City of Anaheim, via the ACSP, needs to plan for modifications in parking demands, air quality standards and water conservation. The arcane model of distinct zoning districts that segregate land uses by type is no longer congruent with what the state mandates to reduce vehicle miles traveled, reduce energy usage, improve air quality and to bring jobs and housing into greater equilibrium, and in close proximity to each other.

Companies looking to expand and/or create new job opportunities seek areas which can deliver housing for their employees in close proximity to the work place. As you know, hundreds of thousands of square feet of new warehouse facilities are under construction on north side La Palma.

We strongly believe that multi-family/mixed use residential should be included in the Development Area DA-5, pursuant to a Conditional Use Permit, on parcels between 4 to 7 acres. We would be pleased to go into greater detail on our suggestions for improving the draft ACSP.

Respectfully,

The PRS Group



Phillip R. Schwartze

President

2. Response to Comments

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2. Response to Comments

A7. **Response to Comments from Phillip R. Schwartz, President, The PRS Group, dated July 13, 2015.**

- A7-1 Comment noted. Figure 3-6, *Existing Zoning*, has been revised to show the Scenic Corridor Overlay. Page 4-12 of the DEIR has been revised to state that the Scenic Corridor Overlay covers the eastern, not western half of the ACSP. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A7-2 The ACSP would update and consolidate two specific plans, the Northeast Area Specific Plan and the PacifiCenter Anaheim Specific Plan, that encompasses majority of ACSP boundaries. The Project Area has been previously disturbed and no significant cultural resources were identified according to the City of Anaheim General Plan Environmental Impact Report and the Northeast Area Specific Plan Cultural Resources Study. As stated in Chapter 8 of the DEIR, archaeological sites are known to occur east of Imperial Highway in the Hill and Canyon area in the City of Anaheim. The Native American Heritage Commission was notified of the proposed project and the Native American contacts list for consultation was received and each of the listed tribes was contacted. Any impacts to archaeological/paleontological resources during grading would be subject to Guidelines §21083.2. In addition, the City has complied with Senate Bill 18 (SB 18) and has sent out letters on October 23, 2014 to applicable tribal representatives for consultation request.
- A7-3 As stated, Increased Residential Use Alternative has been identified as environmentally superior to the ACSP project but would not meet the project objectives to the extent as the ACSP project. Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Anaheim decision-makers for their review and consideration.
- A7-4 Comments are related to the Draft Anaheim Canyon Specific Plan and not to the DEIR. These comments will be forwarded to the appropriate City of Anaheim decision-makers for their review and consideration.

2. Response to Comments

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2. Response to Comments

LETTER A8 – Gabrieleno Band of Mission Indians, Kizh Nation (3 page[s])

A8

Susan Kim

From: Andy <gabrielenoindians@yahoo.com>
Sent: Tuesday, July 07, 2015 5:31 PM
To: Susan Kim
Cc: Christina Swindall Martinez; Kizh Gabrieleno; Sonia Salas; Vicky Goodwin; Matt Teutimez; Kizh Gabrieleno; Tim Miguel
Subject: Pursuant to Section 106 of CEQA, Anaheim Canyon Specific Plan

Dear Susan Kim,
Acting Principal Planner

Pursuant to Section 106 of CEQA, please find this email as a response to your letter about your upcoming project. The homeland of the Kizh (Kite) Gabrieleño, probably the most influential Native American group in aboriginal southern California (Bean and Smith 1978a:538), was centered in the Los Angeles Basin – although our Tribal territory extended eastward as far as the San Bernardino-Riverside area, southward as far as Aliso Creek in Orange County, northward as far as the San Gabriel mountains and westward as far as the coast extending out to the Channel Islands. Your proposed project lies within our traditional tribal territory in an area specifically once where villages adjoined and overlapped with each other. The notes of historians, ethnographers, archaeologists and anthropologists (such as John Peabody Harrington, Lowell Bean, Bernice Johnston, and William McCawley) have provided us resources referencing these village sites dating back to the late Prehistoric and Protohistoric periods.

A8-1

These villages were based on clan or lineage groups and their home-base sites are marked by midden deposits, often with bedrock mortars. During their seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies often left behind signs of special use sites such as grinding slicks on bedrock boulders. There have been countless sites throughout our territory where not only artifacts have been unearthed (i.e. monos, metates, bone or rock tools, shell jewelry, cogstones, soapstone jewelry, or soapstone effigies to name a few) but also, unfortunately the human remains of our ancestors.

The Native American Heritage Commission often refers lead agencies to the respective Native American tribe because they are not the experts on each tribe's cultural resources, nor do they have complete history (both written and oral) regarding the sensitivity and location of historic villages, trade routes, cemeteries and sacred/religious sites on any given tribe. They strongly recommend that County or City planning agencies involve local Native American groups in the management of cultural resources. Native American leaders and representatives must be kept informed about proposed development projects, particularly those situated in potentially or known sensitive areas, so that their concerns may be heard. It is also recommended that City and County planners encourage the use of Native American Monitors during the course of archaeological excavations.

A8-2

Therefore, in order to protect our cultural resources, we are requesting one of our experienced & certified Native American monitors to be on site during any & all ground disturbances. Our Tribe, a non-profit 501(c)3 organization, provides this service as an independent contractor and we have Tribal members who are trained monitors, some of which have HAZWOPER certification if necessary. In addition, liability insurance

2. Response to Comments

certification can be provided. I am available to speak with you directly regarding the specifics of this project, my concerns about cultural resources and the arrangements necessary to provide monitoring at your project. In addition, my Tribal Secretary will handle any paperwork, contracts, quotes, insurance and billing information. We look forward to hearing from you. Please see attached Map which inner Borders our Tribal Territory .

A8-2

Sincerely,



Andrew Salas, Chairman
Gabrieleño Band of Mission Indians – Kizh Nation
[PO Box 393](#)
[Covina, CA 91723](#)
cell [\(626\)926-4131](#)
email: gabrielenoindians@yahoo.com
website: www.gabrielenoindians.org

Dr. Christina Swindall Martinez, secretary
cell [\(818\)406-1392](#)
email: christinaswindall@yahoo.com

2. Response to Comments



The above map shows the delineation of traditional Gabrieleño/Kizh tribal territory on a modern map. This represents the compilation of ethnographic, archaeological, anthropological notes from the resources below including the oral history of our elders. Our southern boundary is Aliso Creek which has its confluence with the Pacific Ocean at the Laguna Niguel area. Our northern coastal boundary was in the vicinity of Topanga Canyon south of the present city of Malibu. Our territory included not only all the coastal zone between those two points, but much of San Fernando Valley. It extended eastward along the San Gabriel Mountains to include the entire San Gabriel Valley extending to Riverside County. Our territory also extended out into the Pacific Ocean into what we call the "Sea of Kizh." Within our sea lies our four islands: San Clemente, San Nicholas, Santa Barbara and our best known, Santa Catalina.

REFERENCES:

- Bean, Lowell John and Charles R. Smith
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2003. Sources of Rebellion: Indian Testimony and the Mission San Gabriel Uprising of 1785. Ethnohistory, vol. 50, no. 3, pp. 643-669
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- Hetzer, R. F.
1968. The Indians of Los Angeles County, Hugo Reid's Letters of 1852. Southwest Museum Papers 21; Los Angeles
Huntington library database of Mission San Gabriel records.
<http://catalog.huntington.org>
- Johnston, Bernice
1962. California's Gabrieleño Indians. Southwest Museum Publications, Los Angeles
- McCawley, William
1996. The First Angelenos: The Gabrieleño Indians of Los Angeles. Banning: Malki Museum Press and Ballena Press
- Salas, Ernie and Andrew Salas
1952 to present. Oral history documented in writing and video within Tribal archives.

Sent from my iPhone

2. Response to Comments

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2. Response to Comments

A8. Response to Comments from Andrew Sala, Chairman, Gabrieleno Band of Mission Indians, Kizh Nation, dated July 7, 2015.

A8-1 Comment noted. No response is necessary.

A8-2 Comment noted. The City has notified and informed the Native American tribal groups per the contact list provided by the Native American Heritage Commission of the proposed ACSP. The proposed project would be subject to Guidelines §21083.2 for archaeological resources and will encourage use of Native American Monitors during the course of archaeological excavations as appropriate and necessary. However, considering disturbed nature of the ACSP Area, requiring a qualified Native American Monitor to be on site during any and all ground disturbances is not warranted.

2. Response to Comments

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2. Response to Comments

LETTER A9 – Southern California Regional Rail Authority (SCRRA) (2 page[s])

A9

METROLINK

Southern California Regional Rail Authority

July 13, 2015

Ms. Susan Kim
Acting Principal Planner
City of Anaheim
Planning Department
200 South Anaheim Boulevard
Anaheim, CA 92805

RE: ANAHEIM CANYON SPECIFIC PLAN – DEIR NOTICE OF AVAILABILITY (NOA)

Dear Ms. Kim:

The Southern California Regional Rail Authority (SCRRA) has received the NOA for the DEIR for the Anaheim Canyon Specific Plan. Thank you for the opportunity to comment on key issues relative to SCRRA and operations of the railroad adjacent to the project site. As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink. Additionally, SCRRA provides rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (METRO), San Bernardino Associated Governments (SANBAG), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

A9-1

It is noted that the Anaheim Canyon Specific Plan boundaries include commuter and freight rail lines owned by the BNSF Railway Company (San Bernardino Subdivision) to the north and the Orange County Transportation Authority's (OCTA) Olive Subdivision in the middle. The Olive Subdivision railroad right of way that bisects the Specific Plan boundaries is operated and maintained by SCRRA to run the Metrolink commuter rail service. The Metrolink Anaheim Canyon Station is located on this line adjacent to the La Palma Avenue at-grade crossing.

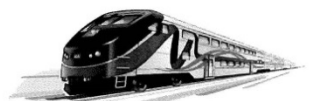
Please note that these are initial general comments submitted to meet the public comment period. SCRRA may follow up with more specific comments for consideration if further analysis deems it necessary.

Comments on the Anaheim Canyon Specific Plan are as follows:

1. The Southern California Regional Rail Authority (SCRRA) is the Joint Powers Authority (JPA) that operates and maintains the commuter rail service known as Metrolink. SCRRA should be included on the Acronym page of the document.

A9-2

One Gateway Plaza, Floor 12 Los Angeles, CA 90012 T (213) 452.0200



metrolinktrains.com

2. Response to Comments


Ms. Susan Kim
Page 2
July 13, 2015

2. For future mailings on NOP's and DEIR's please mail to Metrolink Planning Department, P.O. Box 531776, Los Angeles, CA 90053-1776. | A9-3
3. Metrolink operates 16 commuter trains, 1 non-revenue train and BNSF operates 3 freight trains daily through this area on the Olive Subdivision rail line. Trains can operate 24 hours a day seven days a week. | A9-4
4. The at-grade railroad crossings at La Palma Avenue, Tustin Avenue, Miraloma Avenue and Jefferson Street were all rebuilt to the current SCRRA Rail Highway Grade Crossing standards under a county-wide program initiated and funded by OCTA in cooperation with the City of Anaheim and SCRRA. The City of Anaheim has petitioned the Federal Railroad Administration (FRA) in 2011 for Quiet Zone status where the locomotive engineers are not required to sound the train horns in advance of the at-grade railroad crossings. Please note that any developments being constructed in the vicinity of these railroad crossings cannot lower the safety standards that allowed the FRA to grant Quiet Zone status. Diagnostic meetings with City, SCRRA and the California Public Utilities Commission (CPUC) may be required to ensure the city retains its Quiet Zone status with modifications to the approaches to the crossings. These safety enhancements and standards can be found in a document entitled **SCRRA Rail Highway Grade Crossing Recommended Design Practices and Guidelines** on our website at www.metrolinktrains.com. | A9-5
5. As information, SCRRA is working with OCTA and the City of Anaheim on a design to modify the existing Anaheim Canyon Metrolink station with a second platform, parking modifications and addition of a second track. The second track will also impact the at-grade crossings at La Palma Avenue and Tustin Avenue. It is anticipated that construction for these enhancements may commence in early 2018. | A9-6
6. We are encouraged to see that the Specific Plan "Increased Residential Use Alternative" could generate a walkable Transit Oriented Development (TOD) environment with safer and improved pedestrian access to the existing Metrolink Station. This could include enhancements near the Anaheim Canyon Station at La Palma Avenue and also in the vicinity of the future Placentia Station along the BNSF San Bernardino Subdivision. | A9-7

City shall provide timely notice, in accordance with Public Resources Code Section 21092.5 and State CEQA Guideline Section 15088, of the written proposed responses to our comments on this environmental document and the time and place of any scheduled public meetings or public hearings by the agency decision makers at least 10 days prior to such a meeting.

Thank you again for cooperating with SCRRA to help ensure the development of a successful project. If you have any questions regarding these comments please contact me at 213-452-0456 or via e-mail at mathieur@scrra.net.

Sincerely,



Ron Mathieu
Sr. Public Project Specialist

Cc: Roderick Diaz, SCRRA
Patricia Watkins, SCRRA
Scott Johnson, SCRRA
Dan Phu, OCTA

Naresh Patel, SCRRA
Stuart Chuck, SCRRA
Lora Cross, OCTA

2. Response to Comments

A9. Response to Comments from Ron Mathieu, Sr. Public Project Specialist, SCRRA, dated July 13, 2015.

- A9-1 Comment noted. No response is necessary.
- A9-2 Comment noted. Pages xv and xviii of the DEIR have been revised. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A9-3 Comment noted. Future mailings will be addressed to Metrolink Planning Department, P.O. Box 531776, Los Angeles, CA 90053-1776.
- A9-4 Comment noted. Text was added to include additional information regarding train operations in page 5.14-1 of the DEIR. The revision would not change the conclusion of DEIR analysis. Please refer to Chapter 3, *Revisions to the Draft EIR*.
- A9-5 The City understands and concurs with the comment that any development constructed in the vicinity of the La Palma Avenue, Tustin Avenue, Miraloma Avenue, and Jefferson Street grade crossings cannot lower the safety standards that allowed Federal Railroad Administration (FRA) to grant Quiet Zone status and diagnostic meetings with City, Southern California Regional Rail Authority (SCRRA) and the California Public Utility Commission may be required to ensure that city retains its Quiet Zone status with modifications to the approaches to the crossings. Therefore, comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Anaheim decision-makers for their review and consideration. No further response is necessary.
- A9-6 Comment noted. No response is necessary.
- A9-7 Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Anaheim decision-makers for their review and consideration.

2. Response to Comments

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3. Revisions to the Draft EIR

3.1 INTRODUCTION

This section contains revisions to the DEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

3.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DEIR.

Page 5.3-4, Section 5.3.2, Biological Resources, Existing Conditions, is hereby modified as follows in response to Comment A1 from Orange County Water District (OCWD):

The Project Area has several areas designated as Open Space, Parks and Water Uses in the City's adopted General Plan. These include the Santa Ana River wash, its river banks, and adjoining undeveloped but mostly disturbed areas as well as several Orange County Water District (OCWD) Groundwater Recharge Basins including ~~Santa Ana River lakes, Warner Basin, Little Water Basin, Conrock Basin, Huckleberry Basin, Kraemer Basin, Miraloma Basin, and Anaheim Lake.~~ Warner Basin, Little Warner Basin, Conrock Basin, Huckleberry Basin, and Anaheim Lake.

Page 5.3-7, Section 5.3.2, Biological Resources, Existing Conditions, is hereby modified as follows in response to Comment A1 from OCWD:

The Project Area contains several OCWD groundwater recharge basins, including the Kraemer Basin, Miller Basin, Miraloma Basin, Warner Basin, ~~Santa Ana River Lakes, Little Warner Basin, Conrock Basin, Huckleberry Basin, and Anaheim Lake, and other smaller basins.~~ Little Warner Basin, Conrock Basin, Huckleberry Basin, and Anaheim Lake. The basins are surrounded by industrial and commercial areas. ~~The Santa Ana River Lakes, Corona Lake, and Anaheim Lake~~ Warner Basin provides recreational uses to local fishermen. These basins ~~are~~ is stocked with fish, including rainbow trout (*Oncorhynchus mykiss*), channel catfish (*Ictalurus punctatus*), and largemouth bass (*Micropterus salmoides*), and are open for public use for a fee.

3. Revisions to the Draft EIR

Page 5.3-11, Section 5.3.2.3, Biological Resources, Jurisdictional Waters and Wetlands, is hereby modified as follows in response to Comment A1 from OCWD :

The Santa Ana River and the OCWD groundwater recharge basins, including the ~~Santa Ana river Lakes~~, Anaheim Lake, Warner Basin, Kraemer Basin, and others within the Project Area contain jurisdictional waters and wetlands.

Page 5.8-21, Section 5.8.3 Land Use and Planning, SCAG RCP Consistency Analysis, is hereby modified as follows in response to Comment A1 from OCWD:

Consistent: The Project Area contains riparian vegetation and wetlands in the Santa Ana River and ~~lakes areas in the vicinity of recharge basins~~. The ~~Santa Ana River lakes~~, Warner Basin, Little Warner Basin, Conrock Basin, Huckleberry Basin, Kraemer Basin, Miraloma Basin, and Anaheim Lake contain open water habitat that is used by migratory and resident waterfowl and other bird species, principally for foraging.

Page 5.13-3, Section 5.13.1 Recreation. Santa Ana River Trail, is hereby modified as follows in response to Comment A1 from OCWD:

Several water basins along the Santa Ana River are used for recreation purposes: Anaheim Lakes, Warner Basin, and Burris Basin ~~the Miller Retarding Basin and the Five Coves area~~, which is located north of Ball Road along the western side of the river outside of the specific planning area.

Page 5.7-9, Section 5.7.1 Hydrology and Water Quality, Groundwater, is hereby modified as follows in response to Comment A1 from OCWD:

The Project Area lies within the boundaries of the Orange County Groundwater Basin, which underlies the northern half of Orange County, covering approximately 310 square miles (DWR 2003). The Orange County Groundwater Basin is bordered by the Coyote and Chino Hills to the north, the Santa Ana Mountains to the northeast, the Pacific Ocean to the southwest, and terminates near the Orange County boundary to the northwest, where it connects to the Central Basin of Los Angeles. The hydrogeology of the Orange County Groundwater Basin is characterized by a deep structural alluvial basin containing a thick accumulation of interbedded sand, silt, and clay. The California Department of Water Resources (DWR) has divided the Basin into two zones, the Forebay and the Pressure areas. The Project Area is in the Forebay zone, where the majority of the recharge to the Basin occurs through the percolation of Santa Ana River water in recharge basins.

Groundwater in the Basin is managed by the Orange County Water District (OCWD). Groundwater extraction occurs from more than 500 production wells in the basin. The water supply system also includes 800 monitoring wells, more than 1,000 acres of recharge ponds, two seawater intrusion barriers, three

3. Revisions to the Draft EIR

desalters, the Groundwater Replenishment System, and the Prado wetlands; and Prado Dam located in San Bernardino County and Riverside County, respectively (OCWD 2013).

Page 5.13-3 to 4, Section 5.13.1 Recreation, Environmental Impacts, is hereby modified as follows in response to Comment A1 from OCWD:

In addition to the groundwater recharge activities, implementation of the ACSP would encourage the creation of bicycle and pedestrian ~~trails~~ trails that link Anaheim Canyon to surrounding neighborhoods and the Santa Ana Trail system. The ACSP would also provide options for additional parks, open space, and recreation facilities for area workers and residents through identifying these potential open space improvements:

- **Basin Turf Conversion:** This project would convert approximately 10.8 acres of irrigated and inaccessible turf into California-friendly planting with trails and seating areas around Kraemer Basin, Anaheim Lake, and ~~Water~~ Warner Basin. These improvements would require close coordination with OCWD.

Page 5.15-13 to 14, Section 5.15.2.1 Utilities and Service Systems, Groundwater, is hereby modified as follows in response to Comment A1 from OCWD:

The basin holds millions of acre-feet (AF) of water, of which ~~about 1.25 to 1.5 million AF is available for use~~ approximately 300,000 AF is available for production on an annual basis. To ensure that the basin is not overdrawn, OCWD recharges it with local and imported water. Groundwater conditions in the basin are influenced by the natural hydrologic conditions. The basin is recharged primarily by four sources: (1) local rainfall, which varies due to the extent of the annual seasonal precipitation; (2) storm and base flows from the Santa Ana River, which includes recycled wastewater from treatment plants in Riverside and San Bernardino Counties; (3) imported water; and (4) highly treated recycled wastewater. The basin generally operates as a reservoir, ~~and the net amount of water stored is increased in wet years to allow for manageable overdrafts in dry years~~ with water levels maintained within an operating range to assure long-term basin sustainability. According to OCWD's Engineer's Report for fiscal year 2012/13, total groundwater production from the basin in OCWD's jurisdiction was 309,295 AF. The production capability of the basin has increased as a result of increased wastewater reclamation and ~~the blending of waters of different qualities~~ a managed aquifer recharge program to produce provide high-quality potable water for public distribution. The basin is a managed basin and not in a state of overdraft. The WSA indicates that the basin is one of the ~~most plentiful sources of largest groundwater basins in the entire state, containing approximately 1.25 to 1.5 million AF of water available for use at the present time, and millions of acre-feet that could possibly be produced in the future~~. Although the volume of water in storage is large, annual production must be managed at levels that assure long-term basin sustainability.

The basin is managed by the OCWD, a special district created by the State Legislature. Although there are no limits to pumping from the basin, OCWD sets a target level of pumping from the basin, referred to as the

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~~Basin Production Percentage (BPP). Though all pumpers within the basin are permitted to pump from it, OCWD is charged with managing the groundwater basin, largely through the Basin Production Percentage (BPP) that it establishes each water year.~~

The BPP is set annually based on groundwater conditions, availability of imported water supplies, ~~ideal~~ precipitation, ~~Santa Ana River runoff~~, and basin management objectives. In essence, the BPP is the set percentage all pumpers in the basin can pump without paying a high “pumping tax” an additional assessment or Basin Equity Assessment (BEA) to OCWD.

Page 5.15-14, Section 5.15.2.1 Utilities and Service Systems, Groundwater, is hereby modified as follows in response to Comment A1 from OCWD:

For the water year, a total of 41,653 AF of supplemental water was used for the purpose of groundwater replenishment and barrier maintenance to prevent seawater intrusion from occurring in areas of the groundwater basin adjacent to the Pacific Ocean ~~in Huntington Beach, Costa Mesa, and Fountain Valley.~~

~~Based on the groundwater basin conditions for the water year ending June 30, 2013, OCWD may purchase up to 120,000 AF for groundwater basin replenishment during the ensuing water year, beginning July 1, 2014. OCWD’s substantial investment in facilities, basin management, and water rights protection resulted in the elimination and prevention of adverse long-term “mining” overdraft conditions in the basin. And OCWD continues to develop new replenishment supplies, recharge capacity, and basin protection measures to meet projected production from the basin during average/normal rainfall and drought periods. OCWD also has invested in seawater intrusion control (injection barriers), recharge facilities, laboratories and basin monitoring to effectively manage the basin.~~

Page 5.15-15, Section 5.15.2.1 Utilities and Service Systems, Recycled Water, is hereby modified as follows in response to Comment A1 from OCWD:

Anaheim indirectly participates in regional water recycling through the Groundwater Replenishment System (GWRS) by a joint project of the OCWD and Orange County Sanitation District (OCSD) operated by OCWD.

Page 5.7-6, Section 5.7.1.3, Hydrology and Water Quality, ACSP Area Drainage, is hereby modified as follows in response to Comment A2 from Orange County Public Works (OCPW):

Drainage patterns in the Project Area vary, but most runoff is conveyed by surface streets or local storm drains to regional storm drainage facilities owned ~~and maintained~~ by the Orange County Flood Control District (~~OC Flood~~ OCFCD) and maintained by the Orange County Public Works Department, Operations and Maintenance.

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Page 5.7-6, Section 5.7.1.3, Hydrology and Water Quality, ACSP Area Drainage, is hereby modified as follows in response to Comment A2 from Orange County Public Works (OCPW):

These plans are being developed following the OC Flood's publication of new hydrologic parameters, which resulted in greater storm runoff projections than previously estimated in accordance with the 1986 Orange County Hydrology Manual, Addendum No. 1 issued in 1995, and the County of Orange Local Drainage Manual. This resulted in most existing storm drain systems in the City of Anaheim, including in the Specific Plan area, to be classified as undersized. Some of the existing storm drains within the Project Area have been characterized as deficient, based on Drainage Master Plan studies. The City of Anaheim's current standard is to size City owned and maintained drainage systems to fully convey all storm water for a ~~minimum 1025-year~~ storm event, with drainage basins tributary to the Santa Ana River sized to convey water from a 25 year storm event. For OCFCD facilities, the design standard is the 100-year storm as feasible. Where improvements to local drainage facilities have the potential to increase discharges to County facilities, the City analyzes potential impacts to County facilities in consultation with the Manager, Orange County Public Works, Infrastructure Program. Encroachment permits are required from the County's Public Permits Section for any activity performed within OCFCD's right of way.

A map of the existing storm drain system in the Project Area is provided as Figure 5.7-1, *Existing Storm Drain System*. In general, the City of Anaheim maintains the local storm drain facilities, which discharge into ~~OC Flood's~~ OCFCD's regional channels and the Santa Ana River. The ~~OC Flood~~ OCFCD channels within or tributary to the Project Area include:

- Carbon ~~Creek~~ Canyon Channel (E03)
- Carbon Creek Diversion Channel (~~E02B01~~)
- Richfield Channel (E05)
- Atwood Channel (E04)
- Chantilly Storm Channel (E01S02)

The Carbon ~~Creek~~ Canyon Channel and Atwood Channel discharge into the Miller Retarding Basin, which is west of Anaheim Lake, ~~and the Carbon Creek Diversion Channel flows from the Miller Retarding Basin through the northwestern portion of the Project Area, collecting additional storm water and eventually discharging into the Santa Ana River (OC Flood OCFCD 2003).~~

Page 5.7-17, Section 5.7.3, Hydrology and Water Quality, Environmental Impacts, is hereby modified as follows in response to Comment A2 from Orange County Public Works (OCPW):

Although the City's storm drain system has functioned adequately in the past, preliminary information indicates that the existing storm drain system, including the Project Area, may be undersized, ~~due to Orange County's revision of hydrologic parameters, resulting in greater storm runoff projections than previously estimated.~~ The City of Anaheim is in the process of identifying deficiencies in the system and proposing capital improvements to upgrade the system. All new projects would be required to prove that runoff for

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their site could be fully conveyed by the existing storm drainage system for a ~~minimum 10~~25-year storm event, with drainage ~~basins tributary to the Santa Ana River sized to convey water from a 25-year storm event into OCFCD facilities designed to convey 100-year flows where feasible~~ (City of Anaheim 2004). ~~The site design and hydrology calculations would be subject to City review~~ Each project applicant within the Project Area would be required to prepare a hydrology/hydraulics study for City review and approval to verify that any increased in project flows could be accommodated by the existing drainage system. Where improvements to local drainage facilities have the potential to increase discharges to OCFCD facilities, the City will analyze these potential impacts in consultation with the Manager of the Orange County Public Works/Infrastructure Program. With implementation of these measures, impacts to City and County storm drain capacities would be less than significant.

Page 3-27, Section 3.4, Project Description, Intended Uses of the EIR, is hereby modified as follows in response to Comment A2 from Orange County Public Works (OCPW):

This Draft Environmental Impact Report (DEIR) is a project EIR, which examines the environmental impacts of the proposed ~~residential~~ project.

Page 5.7-1, Section 5.7, *Hydrology and Water Quality*, is hereby modified as follows in response to Comment A2 from Orange County Public Works (OCPW):

- Orange County *Model Water Quality Management Plan (WQMP) and ~~Supplemental~~ Technical Guidance Document* dated August 2011.
- Orange County ~~Flood Control District (OC Flood)~~ *Drainage Area Management Plan (DAMP)* dated July 2003.

Page 5.15-15, Section 5.15.2.1 Utilities and Service Systems, Imported Water, is hereby modified as follows in response to Comment A4 from the Metropolitan Water District (MWD):

The City purchases both treated potable and untreated nonpotable water from Metropolitan. The treated water is delivered through ~~five~~ seven major feeders—East Orange County Feeder Nos. 1 and 2 , Orange County Feeder, Second Lower Feeder, West Orange County Feeder, Santiago Lateral, and Allen-McColloch Pipeline, through Municipal Water District (MWD) connections A-01 through A-07.

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Page 5.15-16, Section 5.15.2.1 Utilities and Service Systems, Current Drought, is hereby modified as follows in response to Comment A4 from MWD:

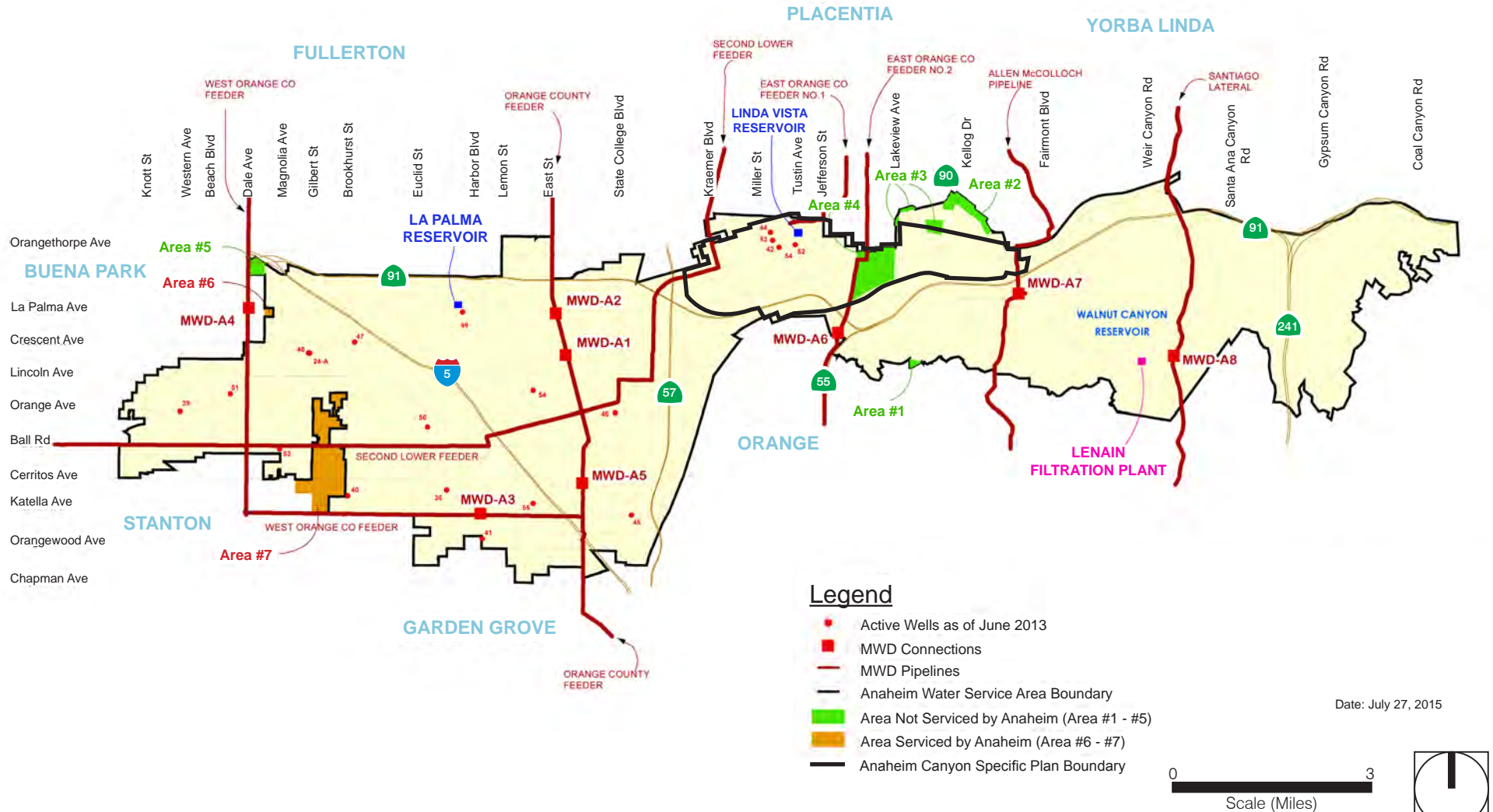
~~Although imported water supply is impacted to some degree by the current drought conditions in California, Metropolitan has indicated they have up to two years of supply in storage.~~

Figure 5.15-2, Anaheim Public Utilities Major Facilities & Service Area, is hereby modified in response to Comment A4 from MWD.

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Figure 5.15-2 - Anaheim Public Utilities Major Facilities & Service Area
5. Environmental Analysis



Source: WSA (Psomas, July 2015)

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Page 5.14-100, Section 5.14.1.1, Transportation and Traffic, Mitigation Measures, Mitigation Measure T-8, is hereby modified as follows in response to Comment A5 from Caltrans:

g) Future traffic improvement phasing analyses for Caltrans facilities shall utilize the latest adopted HCM methodology. In addition, proposed intersection modifications within Caltrans right-of-way shall be consistent with Caltrans Traffic Operations Policy Directive 13-02: Intersection Control Evaluation (ICE).

Page 5.14-107, Section 5.14.8, Transportation and Traffic, Level of Significance After Mitigation, Impact 5.14-3, is hereby modified as follows in response to Comment A5 from Caltrans:

Impact 5.14-3

State highway facilities within the study area are not within the jurisdiction of the City of Anaheim. Rather, those improvements are planned, funded, and constructed by the State of California through a legislative and political process involving the State Legislature; the California Transportation Commission (CTC); the California ~~State Transportation Agency Business, Transportation, and Housing Agency~~; the California Department of Transportation (Caltrans); and OCTA. Recent funding opportunities designated by OCTA's Renewed Measure M provide the vehicle for designated improvements on the freeway facilities within the study area and were analyzed at their recommended build-out in the ACSP.

Page 3-28, Section 3.4 Project Description, Intended Uses of the EIR, is hereby modified as follows in response to Comment A5 from Caltrans:

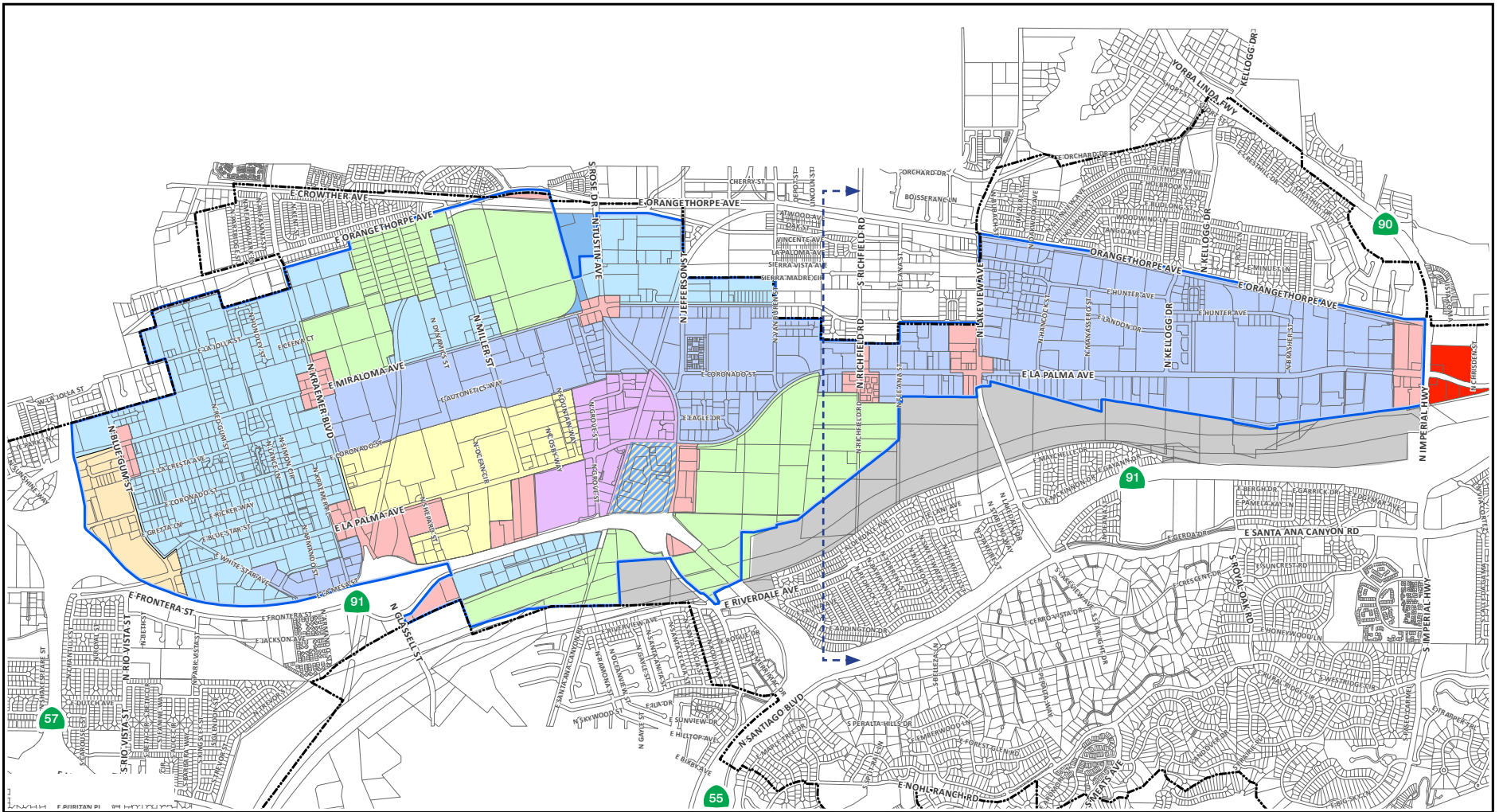
Responsible Agencies	Action
Orange County Sanitation District (OCSD)	Approve necessary sewer upgrades to OCSD facilities.
California Department of Transportation (Caltrans)	<u>Coordinate with the City on any necessary roadway improvements to Caltrans facilities and issue any required encroachment permits within Caltrans right-of-way.</u> Provide necessary roadway improvements.

Figure 3-6, Existing Zoning, is hereby modified in response to Comment A7 from the PRS Group.

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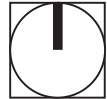
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Figure 3-6 - Existing Zoning
3. Project Description



Key to Features

Specific Plan 94-1	Development Areas for SP 94-1	DA3 - La Palma Core Area	General Commercial
Anaheim City Boundary	DA1 - Industrial Area	DA4 - Transit Center Area	Transition
Scenic Corridor Overlay Zone	DA1A - Industrial Area - Recycling Overlay	DA5 - Commercial Area	Industrial
	DA2 - Expanded Industrial Area	DA6 - Open Space	Specific Plan 88-3



Source: City of Anaheim 2013

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Page xv, Chapter 1, Abbreviations and Acronyms, is hereby modified as follows in response to Comment A9 from Metrolink:

I	Interstate
JPA	<u>Joint Powers Authority</u>
LBP	lead-based paint

Page xviii, Chapter 1, Abbreviations and Acronyms, is hereby modified as follows in response to Comment A9 from Metrolink:

SCG	Southern California Gas Company
SCRRA	<u>Southern California Regional Rail Authority</u>
SCS	sustainable communities strategy

Page 5.14-1, Section 5.14.1.1, Transportation and Traffic, Traffic Impact Analysis Study Area, is hereby modified as follows in response to Comment A9 from Metrolink:

In addition to the three state routes (SR-91, SR-90 and SR-57), access is provided by two Metrolink commuter rail lines, the Inland Empire-Orange County Line and the 91 Line. These passenger rail lines have shared use with Union Pacific Railway (UPR) and Burlington Northern Santa Fe (BNSF) Railway freight operations. The Southern California Regional Rail Authority (SCRRA) is the Joint Powers Authority (JPA) that operates and maintains the commuter rail service known as Metrolink. Metrolink operates 16 commuter trains, 1 non-revenue train and BNSF operates 3 freight trains daily through this area on the Olive Subdivision rail line. Trains can operate 24 hours a day seven days a week.

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Appendix A. Additional Traffic Data

Appendix

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LAKEVIEW/SR91 WESTBOUND RAMPS

	EXISTING		2040 PLUS PROJECT		2040 GP BUILDOUT		
	AM	PM	AM	PM	AM	PM	
WBL	43	62	41	71	50	77	
WBT	0	0	0	0	0	0	
WBR	485	255	429	463	383	389	
	528	317	470	534	433	466	
		TE		TB	1004		899
			37	68	PROJECT TRIPS ABOVE GP BUILDOUT		
				T	217 GP BUILD - EXISTING		
WESTBOUND OFFRAMP ONLY							
FAIR SHARE	T/(TB-TE)						
31.3%	68/(534-317)						

KRAEMER/SR91 EASTBOUND RAMPS

	EXISTING		2040 PLUS PROJECT		2040 GP BUILDOUT		
	AM	PM	AM	PM	AM	PM	
SBR	446	714	782	759	781	646	
SBT	670	833	1308	1245	1165	959	
WBR	944	465	752	349	731	349	
NBT	830	913	777	1431	659	1275	
NBR	335	261	500	309	447	296	
EBR	476	606	411	777	443	852	
	3701	3792	4530	4870	4226	4377	
		TE		TB	9400		8603
			304	493	PROJECT TRIPS ABOVE GP BUILDOUT		
				T	829 1078 GP BUILD - EXISTING		
PM PEAK HOUR							
FAIR SHARE	T/(TB-TE)						
45.7%	493/(4870-3792)						
AM PEAK HOUR							
FAIR SHARE	T/(TB-TE)						
36.7%	304/(4530-3701)						
41.2% AVERAGE OF PEAK HOURS							

Freeway Assignments

to/from	%	Project ADT	
91 east	7.0%	8,735	
91 west	11.3%	14,101	
55 south	11.4%	14,226	
57 north	4.6%	5,740	
57 south	5.0%	6,240	
90 north	3.8%	4,742	
	43.1%		56.9%

Anaheim Canyon Specific Plan - Percent of Trip Distribution on Freeways
ATAM Year 2035

