

January 2020 | NEPA Environmental Assessment

CENTENNIAL PARK/SANTA ANA COLLEGE PARK REPLACEMENT PROJECT

City of Santa Ana

Prepared for:

National Park Service

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1. Proposal Description

1.1 PURPOSE AND NEED FOR FEDERAL ACTION/BACKGROUND

1.1.1 Background and Need for Proposal

The Centennial Park is an 87-acre regional park owned and operated by the City of Santa Ana, at 3000 W Edinger Avenue, Santa Ana, Orange County, California 92704. Centennial Park was developed on the land once owned and operated by the United States Government as a Communications Center, known as the Federal Communications Commission Monitoring Station (FCC Site), which when no longer needed by the federal government became available for disposal as government surplus property under the Federal Property and Administrative Services Act of 1949, as amended (40 USC §550 et seq.).

The City acquired the 21.65-acre portion of the Centennial Park by a public benefit conveyance deed (USA Deed) from the federal government through the Department of the Interior (DOI) acting as the federal sponsoring agency. The law requires that “all of the property be used and maintained for the purpose for which it was conveyed in perpetuity, and that if the property ceases to be used or maintained for that purpose, all or any portion of the property shall, in its then existing condition, at the option of the Government, revert to the Government,” and that the deed “may contain additional terms, reservations, restrictions, and conditions the Secretary of the Interior determines are necessary to safeguard the interests of the Government.” The USA Deed contained further provision that the property shall not be sold, leased, assigned, or otherwise disposed of except to another eligible governmental agency that the Secretary of the Interior agrees in writing can assure the continued use and maintenance of the property for public park or public recreational purposes subject to the same terms and conditions in the original instrument of conveyance.

The City’s application for Federal Surplus Property (Application) was dated November 19, 1975. The City’s request for the property for use as public park and recreation area was granted under the condition that the FCC Site was to be used only for public park and recreation purposes in perpetuity under the terms of the public benefit conveyance program and the USA Deed conditions. Figure 1, *Master Plan for Centennial Park*, shows the limits of the FCC Site and the initial Master Plan for Centennial Park.

The City currently leases 2.6 acres of land at Centennial Park to the Rancho Santiago Community College District (RSCCD), and the leased 2.6-acre land is within the FCC Site. The RSCCD uses the site for its Santa Ana College’s School of Continuing Education, Centennial Education Center (CEC), which provides career-specific educational opportunities to adults. The 2.6-acre leased area is referred to as CEC Site.

Although initial approval of a facility on the park site required that it be geared toward public outdoor recreation, over the years the 2.6-acre area drifted away from the park and recreation requirements of the USA Deed becoming more of a traditional community college, and the facility was enlarged. In the process, the City

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had also granted a lease to the Community College in violation of the terms of the USA Deed's prohibition of conveying such property interests without the approval of the DOI, and for purposes other than the public park and recreation area purposes of the land conveyance.

DOI has authority to enforce its conditions and seek resolution to compliance issues by various means if the property were not used in conformity with those requirements, and the existing recreation use does not sufficiently mitigate the non-recreation purpose of the educational use. When the National Park Service (NPS) was approached regarding approval of an extension of the college's 30-year lease in 2009, it determined both that the lease was not allowable and that the college was a violation of the USA Deed terms because it was not a public park or recreation area use, therefore a lease extension was rejected. A temporary license was allowed as a means to allow time to resolve the City's compliance issue related to the college's presence on the park property. The five-year license was granted to allow time to find a solution that would bring the property into compliance with the terms of the USA Deed, either by: 1) removing the college from the park property, or 2) pursue a process that would allow the college to remain, through a land exchange that would provide replacement park property, through purchase of the property at market value, or through a change in the public benefit conveyance program. The City, in consultation with the RSCCD, elected to provide replacement park property of equal or greater appraised market value and reasonably equivalent recreational value, and to continue to operate on the CEC Site. To this end, the City is currently pursuing a Federal Lands to Parks Land Exchange to remove the deed condition and transfer it to replacement parklands of an equivalent value. A Recreational Value Assessment for City of Santa Ana's Centennial Park Proposed Federal Land to Park Land Exchange was prepared on August 29, 2018 (2018 RVA). If the City continues to fail to meet obligations under the USA Deed, NPS may reject the request and property could revert to federal ownership for subsequent disposal.

Due to the deed restrictions placed on FCC Site when it was conveyed from the federal government to the City of Santa Ana, approval from the National Park Service (NPS), a bureau of the DOI that administers the Federal Lands to Parks Program, is required for the proposed action. Because NPS approval is required, its decision regarding the proposal to provide replacement park property is subject to the requirements of the National Environment Policy Act (NEPA). In addition to considering the City's statement of need, NPS's main criteria in considering whether or not to approve a proposed land exchange include a determination that it will serve the public park and recreation purposes and requirements of the Federal Lands to Parks Program and other relevant federal laws and regulations, and that General Services Administration concurs in its proposed action.

The following describes how the replacement property will meet current public recreational needs of the City of Santa Ana.

Community Park Need

The Trust for Public Land's (TPL) Center for City Park Excellence has been gathering urban park system data for the past 15 years including acreage, staffing, facilities, budgets, usership, and other aspects of parks. According to the 2017 edition of City Park Facts, Santa Ana has a population of 338,961 people with 746 acres of park. Santa Ana is one of the 100 most populous cities in the U.S. TPL's 2017 City Park Facts indicates that

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4.3 percent of Santa Ana's land acreage is parks, the second lowest percentage among high density cities; the median was 12.1 percent.

According to TPL's data, Santa Ana has 2.2 acres of park per 1,000 residents; this was the second lowest percentage among high density cities, with the median being 6.9 acres per 1000 residents. Additionally, Santa Ana has 1.3 playgrounds per 10,000 residents; only six cities had fewer playgrounds per 10,000 residents. The median for the largest 100 cities in the U.S. regardless of density was 2.3 playgrounds per 10,000 residents. Similarly, Santa Ana has 1.2 basketball hoops per 10,000 residents, while the median is more than double at 2.5.

In order to evaluate how large cities are meeting the need for parks and recreation, the 2017 edition of City Park Facts included the percentage of residents within a 10-minute (half-mile) walk of a park. According to TPL's data, seventy percent of the Santa Ana population is within walkable distance of a park (half-mile).

The 2018 RVA prepared for the land exchange evaluated the number of people within a 10-minute walk (the half-mile service area) of a park, and those within a 5 minute walk (the quarter-mile service area). TPL's data supports the need for additional park acreage, playgrounds, and other play amenities in Santa Ana.

The CEC Site's half-mile service area (10-minute walk) contains 8,798 residents, 1,499 of which live within the quarter-mile service area (5-minute walk). The existing Centennial Park amenities already serve these residents, therefore, keeping the 2.6-acre CEC Site within the Centennial Park for non-park purpose would not affect these residents' accessibility to park services. Given the City's need to keep the CEC Site for educational purposes, not returning it to park use, and the current walkable park deficits in other parts of the City, the proposed action provides an option to meet the current recreational needs while also being compliant with the USA Deed. The proposed replacement parks would place more residents within walking distance of a park than returning the CEC Site to a park use.

The 6th Street Site half-mile service area contains 9,902 residents. Converting this site to a park would not increase the number of City residents with walkable park access, due to the existence of six existing mini parks within the half-mile service area.

The Raitt Street Site half-mile service area contains 10,376 residents; of these, 6,930 are within a 10-minute walk of an existing park. It was determined that if the site is converted to a park, the number of City residents with walkable park access would increase by 3,446 residents. Of these, 1,921 would be within a 5-minute walk of the new park.

The McFadden Site/Pacific Electric Park half-mile service area contained 11,468 residents, all of whom are now within a 10-minute walk of Pacific Electric Park. Prior to the construction of Pacific Electric Park, 6,561 of these residents lived within a 10-minute walk of an existing park. The construction of Pacific Electric Park resulted in an increase in the number of residents with walkable park access by 4,907 residents, with 2,267 of those residents now living within a five-minute walk of a park.

Although converting the 6th Street Site to a park would overlap with several existing mini parks, and thus would not increase the total number of residents with walkable park access, the addition of the 0.42 acres of parkland would increase the acreage of available parkland by over 20 percent within the same service area. There are six

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existing mini parks within the half-mile service area of the 6th Street Site, with a total of 1.89 acres. Additionally, the existing parks in the area generally lack amenities, while the proposed park would include many amenities, such as a play area and exercise equipment, which residents do not have walkable access to. Thus, despite not increasing the number of residents with walkable park access, development of the 6th Street Site would be a valuable asset to existing community.

Demographics

Santa Ana's population grew from 200,000 in 1980 to an estimated 333,268 in 2015, with a majority of the population of Hispanic or Latino descent (78 percent) (PlaceWorks 2018). In 2015 the City's median household income was \$54,392, substantially lower than Orange County's median income of \$78,428.

Populations within a quarter-mile of the CEC Site are less densely populated than those surrounding the replacement park sites, and the percentage of the population that is of Latino or Hispanic descent is also lower at the CEC Site at the replacement park sites. Over half of the households surrounding the 6th Street Site earn less than the median income, while only 32 percent of households surrounding the CEC Site earn \$50K or less. Within the quarter-mile service area of the Raitt Street Site and McFadden Site/Pacific Electric Park, slightly over 40 percent of households earn \$50K or less, which is below the median income for the City.

Another difference between the sites is the percent of population over 18 years old that have not earned a high school diploma. The percent of population without high school diploma was 35 percent at CEC Site, while the percentage ranged from 45 percent to 49 percent for the replacement park sites.

In summary, compared to the CEC Site, the replacement park sites would offer park and recreational opportunities to populations that are denser, have lower incomes and less education, and skew more toward people of Latino/Hispanic Descent. Therefore, it was determined by the 2018 RVA that it is likely that families with fewer economic resources have fewer resources for recreation and entertainment, and thus would benefit greatly from the addition of a park within walking distance of their homes. Furthermore, densely populated communities often include multi-family developments and small residential lots lacking yard space. In these communities, the replacement park sites could provide important recreational opportunities compared to the CEC Site.

1.1.2 Project Objectives

The Proposed Action, if approved, would allow implementation of the following objectives:

- Allow the Community College to remain on the 2.6-acre carve-out of Centennial Park.
- Compliance with the purposes and requirements of the Federal Lands to Parks Program.
- The construction and operation of replacement recreational facilities (for Centennial Park) in the City of Santa Ana.
- Provide replacement neighborhood parks for a community that is highly underserved by recreational opportunities.

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- Provide recreation facilities that provide best benefits to the Santa Ana residents and include opportunities that are relevant to the current generation, such as organized play areas and picnic areas.

1.1.3 Proposed Action

In 2012, the City prepared a Federal Lands to Parks Land Exchange request proposing a 1.25-acre site located along McFadden Avenue at Orange Avenue (McFadden Site) as a replacement for the CEC Site, and the following environmental documents were prepared for the McFadden Site in accordance with NEPA and the California Environmental Quality Act (CEQA).

- National Park Service, Environmental Assessment, Proposed Pacific Electric Park Site, 2012
- City of Santa Ana, Mitigated Negative Declaration/Initial Study, Proposed Pacific Electric Park Site, 2012

Although the McFadden Site was subsequently determined to be insufficient to replace the CEC Site, the McFadden Site was developed and opened in 2018 as the Pacific Electric Park. The City has since identified two additional properties, a 0.42-acre site located at the corner of 6th Street and Lacy Street and a 1.09-acre site at the corner of Raitt Street and Myrtle Street, to be considered as part of the exchange. Therefore, the City proposes three replacement park sites totaling 2.76 acres as land exchange for the leased, 2.6-acre CEC Site. Figure 2, *Regional Location*, and Figure 3, *Local Vicinity*, show all three replacement park sites' relative locations to the Centennial Park.

The 6th Street Site totals 0.42 acres and Raitt Street Site totals 1.09 acres as shown below. Combined with the 1.25-acre Pacific Electric Park, a total of 2.76 acres of replacement parkland would be provided for the RSCCD's 2.6-acre leased property (CEC Site) in Centennial Park.

- 6th Street Site
 - 710 E. 6th Street, Santa Ana, CA 92701 (0.14 acre) – APN 398-334-03
 - 714 E. 6th Street, Santa Ana, CA 92701 (0.14 acre) – APN 398-334-04
 - 720 E. 6th Street, Santa Ana, CA 92701 (0.14 acre) – APN 398-334-05
- Raitt Street Site
 - 415 S. Raitt Street, Santa Ana, CA 92703 (0.45 acre) – APN 007-273-12
 - 423 S. Raitt Street, Santa Ana, CA 92703 (0.64 acre) – APN 007-273-14
- McFadden Site (Pacific Electric Park)
 - 401 E. McFadden Avenue, Santa Ana, CA 92707 (1.25 acres) – APN 011-065-19 through 24

Federal Lands to Park Land Exchange Requirements indicate that replacement land must be of equivalent fair market and recreational value. The 2018 RVA provided justification of public recreational utility of the land proposed for exchange and its replacement (i.e., three replacement park sites), and it concluded that the

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combined recreational value of the three proposed sites are of equivalent recreation value in comparison with the CEC Site at Centennial Park.

The Proposed Action is to accept three replacement parks in exchange for the 2.6-acre, CEC Site leased to RSCCD in Centennial Park. The replacement parklands include three park sites, herein referred to as the 6th Street Site, the Raitt Street Site, and the McFadden Site/Pacific Electric Park. Construction on the McFadden Site/Pacific Electric Park was completed with the specific intent to partially satisfy the land exchange requirements for this conversion, and the site opened as the Pacific Electric Park in January 2018. Therefore, the Proposed Action involves analysis of construction and operation of two community walk-up parks at the 6th Street Site and the Raitt Street Site in the City.

These three replacement parks together would provide replacement for the reduction of Centennial Park by 2.6 acres and the associated loss of recreational opportunity there. The three replacement park sites would be subject to the requirement that they be kept in public park and recreation area use in perpetuity according to Program of Utilization (POU) approved by the DOI, and that if they were not used in conformity with those requirements they could revert to federal ownership for subsequent disposal. In exchange, the public park and recreation area use requirements and the federal reversionary interest for the 2.6-acre CEC site would be removed.

Because the basic requirements for land exchanges include replacement of both recreational usefulness as well as appraised fair market value, this Assessment only considers the potential impacts of the land exchange itself in terms of recreational utility and location. Land market values will be determined by appraisals that must be separately approved by the U.S. General Services Administration for the actual land exchange to take place. At this time, preliminary appraisals indicate that the market value requirement will be met with the three proposed replacement properties.

1.2 AFFECTED ENVIRONMENT

Centennial Park (CEC Site)

The Centennial Park currently contains a diverse mix of active and passive recreation opportunities. Recreation amenities in the park include softball diamonds, a hiking/exercise trail, a playground, lake area, a skateboard facility, picnic areas, basketball courts, football field encircled by a track, and soccer fields. Some of these facilities were constructed as Santa Ana Unified School District (SAUSD)/City joint-use recreational facilities by SAUSD as part of the construction of Hector Godinez Fundamental High School (Godinez High School), located immediately to the south of the park. See Figure 4, *Aerial Photograph – Centennial Park and CEC Site*.

There are two other executed deeds for Centennial Park including 7.1 acres in September 1967 and 57.4 acres in June 1969. The City of Santa Ana's Centennial Park Application for Federal Surplus Property (Application) dated 1975 was for the 21.65-acre FCC Site obtained in 1980, to be used for park and recreation purposes in perpetuity in accordance with the Application and the approved POU. The CEC Site is located within this 21.65-acre area. Figure 1, *Master Plan for Centennial Park*, shows the limits of the FCC Site and as well as the initial Master Plan for Centennial Park.

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The POU was based on the City's master plan concept for Centennial Park that included the following main elements:

- Amphitheater
- Centennial Plaza
- Restaurant
- Community Service Building
- Swimming Pool
- Multi-Purpose Recreation Building
- Bicycle Center
- Tennis Center
- Organized Play Area
- Picnic and Day Camp Areas
- Adventure Playground with Splash Pool
- Arboretum
- Lake
- Regional Bikeway
- Off-street Parking

Within the FCC Site, the following elements from the master plan were proposed, to be constructed in two phases:

Phase I

- Off-Street Parking Area
- Multi-Purpose Recreation Building
- Court Play Area
- Velodrome and Motocross Course
- Boat Rental Facility
- Portion of Portion of Bikeway Loop Lake and Beach Area

Phase II

- Tennis Center
- Portion Of Organized Play Area (ball fields)

The 2.6-acre CEC Site is in the northeast portion of Centennial Park; and this area is being leased to RSCCD providing career-specific educational opportunities to adults. Use of the 2.6-acre as non-park/non-recreational purpose is in violation of the originally approved POU and the USA Deed conditions that the FCC Site was to be used only for public park and recreational purposes in perpetuity. The 2.6-acre CEC Site consists of several buildings, landscaping between buildings, and walkways.

Surrounding the CEC Site are four surface parking lots (Lots A through D) totaling 6.15 acres and 573 parking spaces.

Table 1, *Parking Lot Summary*, describes the acreage and number of spaces in each lot. The parking lots are used by the general public, shared by the Centennial Park users and the CEC students and staff. No spaces are reserved exclusively for the CEC Site use.

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Table 1 Parking Lot Summary

Parking Lot	Acreage	Standard	Handicapped	Total
Lot A	3.61	322	12	334
Lot B	0.76	84	4	88
Lot C	0.33	35	2	37
Lot D	1.45	110	4	114
Total	6.15	548	22	573

A parking technical memorandum was prepared and is included as Appendix A to this EA. According to the Parking Memorandum, CEC students mostly use Lots A and B, the closest and most convenient for CEC students and staff. Lots A and B also showed highest occupancy with a few available parking spaces, and Lot C and Lot D had lower occupancy. On a typical weekday, the overall parking occupancy rate ranged from around 35 percent to 62 percent around 11 AM to 6 PM and around 75 percent to 81 percent around 9 AM to 10 PM and 7 PM to 9 PM. And during a typical Saturday, the occupancy ranged from 37 percent to 72 percent from 8 AM to 11 AM, and 5 percent to 25 percent from 12 PM to 2 PM. In Lots A and B, individual parking lot occupancy was as high as 99 percent around 7 PM to 9 PM and 98 percent around 9 AM to 10 AM. The high occupancy rates coincide with the school operating hours when classes are in session. The parking memorandum concluded that although Lots A and B are heavily used by CEC students during certain hours, there are available parking spaces to accommodate park visitors without shortage. The CEC use of the parking lot, along with the general park users, would not adversely impact park and recreational uses at the Centennial Park. Therefore, the City concluded that the 2.6-acre CEC Site leased to RSCCD would require replacement for its recreational value and the parking lot totaling 6.15 acres would continue to serve the general park users, therefore, was not included in the converted parkland for replacement.

The Proposed Action only converts the 2.6-acre area of the CEC buildings. All parking lots will remain accessible to the public for park use.

Additionally, the City's joint use agreement with SAUSD also includes use of a 514-space parking garage by the park users and CEC from 5:00 PM- midnight on weekdays (extended to 1:00 PM-midnight during the summer) and 8:00 AM-midnight on weekends, although the garage is located outside of the park boundary. An additional lot, located at the southern edge of the park between the parking garage and the lake, provides approximately 128 spaces, bringing the total number of parking spaces available to Centennial Park to approximately 1,215.

Since this land exchange does not include any dedicated parking for the CEC, park use restrictions per the POU and USA Deed conditions would remain on all parking areas within Centennial Park, stipulating that the parking lots are for public park use. If a condition arises that the school use usurps public park use, or that there are shortages of parking for park users due to parking used for CEC, the DOI may take enforcement action, including the possibility of reversion, further land exchange, or other actions suitable for bringing the use back into compliance with the public park use requirements.

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6th Street Site

The 6th Street Site is at the southwest corner of East 6th Street and North Lacey Street, comprised of 710, 714, and 720 E. 6th Street totaling 0.42 acres. The 6th Street Site is identified as Orange County Assessor's parcel numbers (APNs) 398-334-03, 04, and 05; and the site was previously developed with single-family homes but is currently vacant except for some trees. The 6th Street Site is surrounded by a mixture of land uses such as residential, commercial, and institutional, but predominantly by multi- and single-family residential uses. The 6th Street Site is bordered by multi-family uses to the south, single-family uses to the west, Garfield Elementary School and Garfield Community Center to the east of Lacey Street, and multi-family residential uses to the north across 6th Street. A community retail store is at the northwest intersection of 6th Street and Lacey Street. The site is secured by chain-link fencing along the east, north, and portions of west boundaries, and by block wall to the south and a portion of west boundaries. See Figure 5, *Aerial Photograph – 6th Street Site*.

Raitt Street Site

The Raitt Street Site is at the northeast corner of West Myrtle Street and South Raitt Street, comprised of 415 and 423 S. Raitt Street totaling 1.09 acres. The Raitt Street Site is identified as APNs 007-273-12 and 14; has two street fronts, Raitt Street to the west and Myrtle Street to the south. North and east property lines are bounded by multi-family and single-family residential uses, respectively. There are no above-grade structures and the site is secured by chain-link fencing along south and west boundaries and masonry wall from the north and east residential properties. There are several trees on the property. See Figure 6, *Aerial Photograph – Raitt Street Site*.

McFadden Site/Pacific Electric Park

The McFadden Site/Pacific Electric Park located at the northeast corner of the intersection of McFadden Avenue and Orange Avenue. Site is bounded by McFadden Avenue to the south, residences to the north, Maple Street to the east, and Orange Avenue to the west. The McFadden Site/Pacific Electric Park is approximately 1.25 acres in size and includes APNs 011-065-19, 011-065-20, 011-065-21, 011-065-22, 011-065-23, 011-065-24. The Pacific Electric bicycle trail is located adjacent to the project site on its east side across Maple Street. The Pacific Electric Park amenities include a restroom facility, fruit tree grove, amphitheater, community garden, exercise stations, jogging path, play equipment, and a children's train. Figure 7, *Aerial Photograph – McFadden Site/Pacific Electric Park*, shows the existing conditions.

1.2.2 Zoning and General Plan

Centennial Park (CEC Site): Centennial Park/Santa Ana College is designated as OS (Open Space) by the City of Santa Ana General Plan and zone O (Open Space).

6th Street Site: 6th Street Site is designated as UN (Urban Neighborhood) by the City of Santa Ana General Plan and zoned O (Open Space).

Raitt Street Site: Raitt Street Site is designated as LR-7 (Low Density Residential) by the City of Santa Ana General Plan and R1 (Single-Family Residence).

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McFadden Site/Pacific Electric Park: Pacific Electric Park is designated as OS (Open Space) by the City of Santa Ana General Plan and zone O (Open Space).

1.2.3 Project Description

CEC Carve-out at Centennial Park

The action would remove the park use restrictions and federal reversionary interest in the 2.6-acre CEC site. The City would continue to own the property and could continue to lease the site to the Community College, or use it for other purposes. None of the areas outside the 2.6-acre area would be removed from the park-use requirement, and those areas, including all parking lots, would continue to be available to the general public for park and recreation purposes and would not be reserved at any time for the exclusive use of the college.

6th Street Site

The City of Santa Ana proposes to provide a neighborhood park on the 0.42-acre site. This park would be a walk-up, pedestrian park without vehicle parking lot that provides amenities such as overhead shade structures, playground equipment, benches and tables, picnic area, and a skate area. See Figure 8, *Conceptual Site Plan - 6th Street Site*. The park would also include landscaping, rock bio swale, and bridges, and fenced and gated with wrought iron perimeter fencing on the north and east boundaries. The west boundary would be fenced with a terraced block wall ranging from 8 feet to 4 feet; an 8-foot block wall from the southern boundary to the length of the skate area (approximately 62 feet), then the wall height would be reduced to 6-foot, then 4-foot, as shown in Figure 8. Nighttime lighting would be provided throughout the park from five 14-foot, LED light poles. Main pedestrian access to the park would be from the corner of 6th Street and Lacey Street, and two other access would be provided from 6th Street and from Lacey Street. The park would be preserved in perpetuity for public park and recreation area purposes, with a federal reversionary interest placed on the property to ensure compliance.

Raitt Street Site

The city proposes to construct a neighborhood park on the 1.09-acre site. This park would be a walk-up, pedestrian park without vehicle parking lot that provides exercise area, tot lot with playground equipment, a skate area, walking path, restroom, drinking fountain, and picnic tables and benches. No fencing would be provided, except for the skate area, and the skate area would be fenced with wrought iron gate. The park would also provide various landscaping and trees, which incorporates drought tolerant landscaping and preservation of existing trees. Nighttime lighting would be installed throughout the park. Three pedestrian access points are proposed for the park, two from Myrtle Street, and one at the corner of Myrtle Street and Raitt Street. See Figure 9, *Conceptual Site Plan - Raitt Street Site*. The park would be preserved in perpetuity for public park and recreation area purposes, with a federal reversionary interest placed on the property to ensure compliance.

McFadden Site/Pacific Electric Park

The city constructed a neighborhood park on the 1.25-acre site known as the Pacific Electric Park with the specific intent to use the site in partial fulfilment of the Centennial Park land exchange. This park is a walk-up

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park that primarily serves the local neighborhood, and also serves as a rest stop for bicyclists and other recreational trail users. The Pacific Electric bicycle trail runs in a north to south direction parallel to Maple Street along the eastern border of the park. The park contains a small grove of fruit trees, a garden, and a small amphitheatre for educational purposes on its western half. The eastern half of the park contains shade canopies and various playground equipment including swings, a slide/climber, and a rock-climbing feature. A jogging parcourse with exercise stations is also provided with low intensity security lighting. The park landscaping has been designed with drought tolerant planting, drip/water efficient irrigation, and a dry artificial streambed. No vehicle parking is provided. The park would be preserved in perpetuity for public park and recreation area purposes, with a federal reversionary interest placed on the property to ensure compliance.

1.3 NATIONAL ENVIRONMENTAL POLICY ACT

NEPA requires federal agencies to include environmental considerations in planning and decision making and to assess environmental impacts of and alternatives to federal actions. NEPA applies to projects proposed or funded by a federal agency and to projects requiring a permit from a federal agency. The Council on Environmental Quality is charged with general oversight of NEPA compliance. Due to the deed restrictions placed on Centennial Park property when it was conveyed from the federal government to the City of Santa Ana, approval from the NPS is required for the Federal Lands to Parks Land Exchange request. NPS is the federal agency responsible for making a decision regarding potential impacts of the Proposed Action consistent with NEPA requirements. .

1.3.1 Levels of Analysis

There are three levels of analysis under NEPA: Categorical Exclusion, Environmental Assessment/Finding of No Significant Impact (EA/FONSI); and Environmental Impact Statement (EIS). Federal Agencies develop lists of actions exempt from environmental impact review. Exempt actions must be previously deemed to have “no significant impact” to the environment. A federal agency prepares an EA to determine if a project could significantly impact the environment and if more information and analysis is needed in order to make that determination. If the federal agency finds the project will not cause significant environmental impacts, it issues a Finding of No Significant Impact (FONSI). Mitigation measures may be required under a FONSI. If an EA finds that a project has potentially significant environmental impacts, an EIS is to be prepared. An EIS is a detailed evaluation of proposed action and alternatives.

This draft Environmental Assessment (EA) has been prepared to satisfy the requirements of NEPA. The EA discloses, evaluates and explains the potential environmental effects of the Proposed Action. The EA will be reviewed by decision-makers and the public. It describes and evaluates alternatives to the proposed course of action. The Draft EA will be circulated for public review and comment to assure public participation in the process and will provide interested and/or affected parties an opportunity to review and comment on the project, alternatives, and potential impacts. A final EA will incorporate recognition of public concerns and will address those that are within the scope of the EA and purpose for its development.

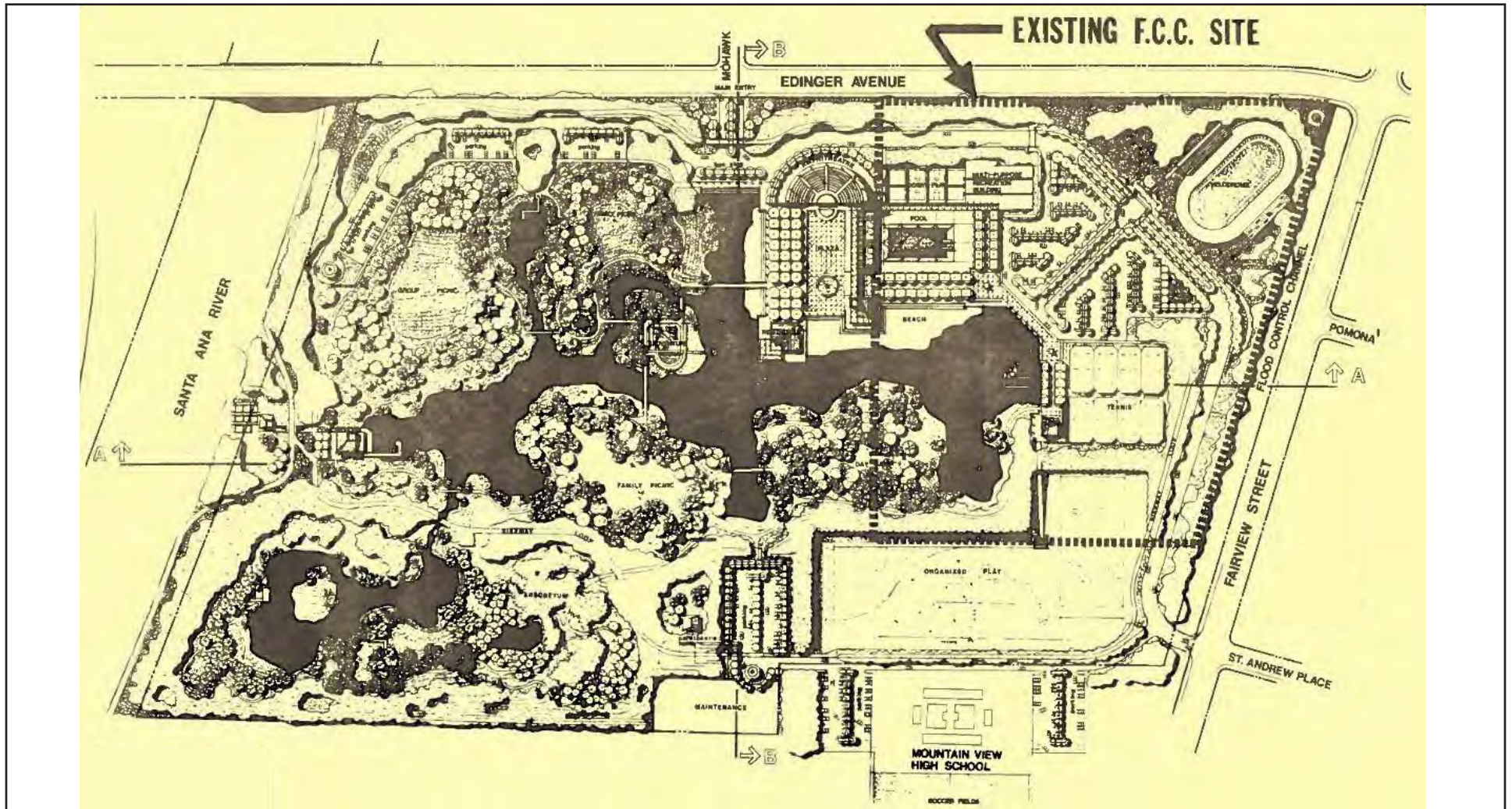
An EA was prepared for the McFadden/Pacific Electric Park replacement in 2012 and determined that it would not cause significant environmental impacts. The McFadden Site/Pacific Electric Park is already being operated

1. Proposal Description

as a neighborhood park, and no further analysis is necessary. Therefore, this EA evaluates environmental impacts from development and operation of two additional replacement park sites only the 6th Street Site and Raitt Street Site.

Under separate cover and available at the City of Santa Ana Parks and Recreation Department, an Initial Study and Mitigated Negative Declaration, was prepared in accordance with the CEQA for the Centennial Park/Santa Ana College Park Replacement Project. The information contained in the Initial Study and Mitigated Negative Declaration can be used to supplement this EA.

Figure 1 - Master Plan for Centennial Park



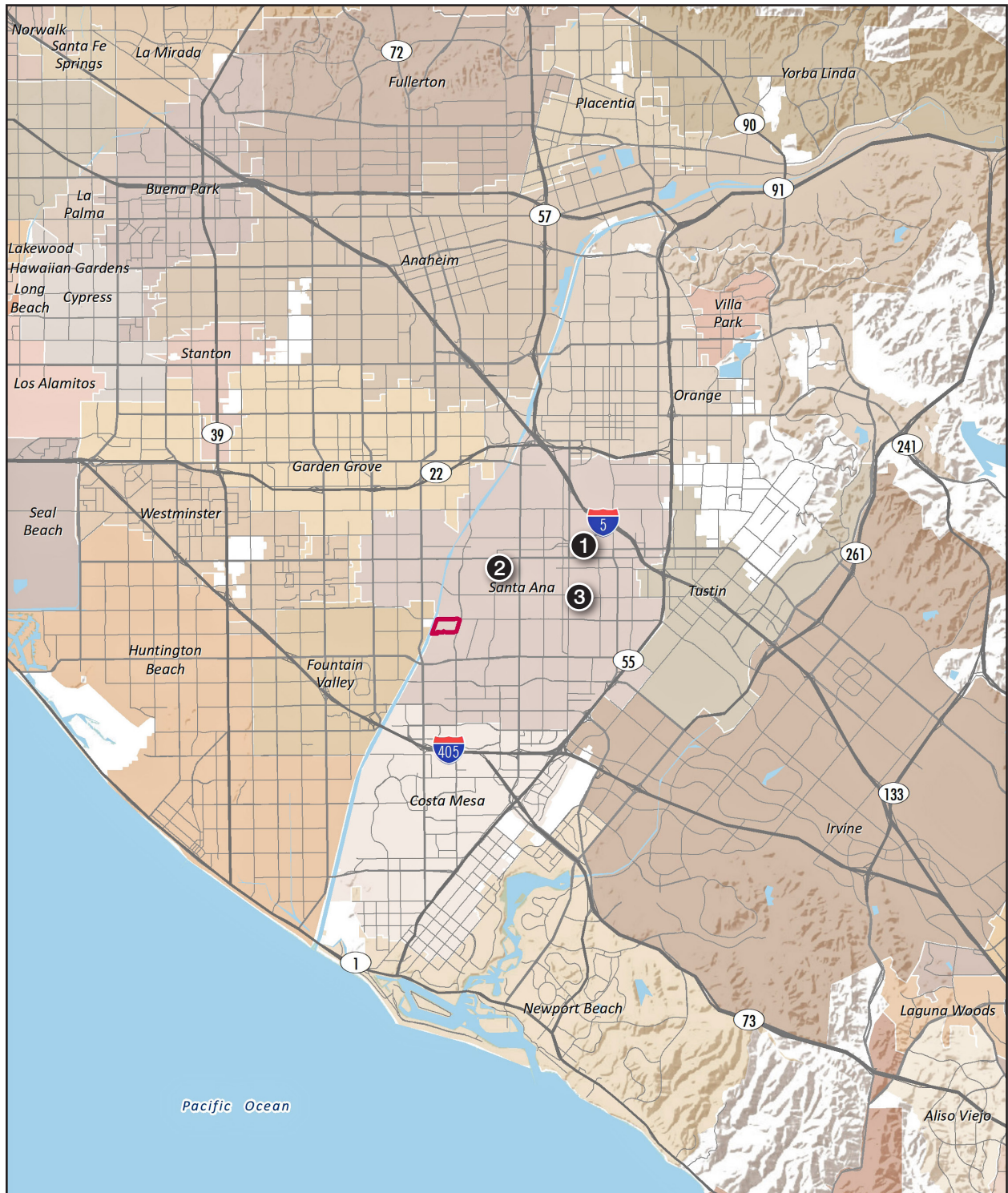
0 400
Scale (Feet)



1. Proposal Description

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Figure 2 - Regional Location



Centennial Park (3000 W. Edinger Ave, Santa Ana)

Note: Unincorporated county areas are shown in white.

- ① 6th Street Site (710, 714, and 720 E. 6th St.)
- ② Raitt Street Site (15 and 423 S. Raitt St.)
- ③ McFadden Site (Northeast Intersection of McFadden Ave and Orange Ave)

0 3
Scale (Miles)



Source: ESRI, 2018

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Figure 4 - Aerial Photograph - CEC Site



Centennial Park (3000 W. Edinger Ave, Santa Ana)

CEC Site

City Boundary

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Scale (Feet)

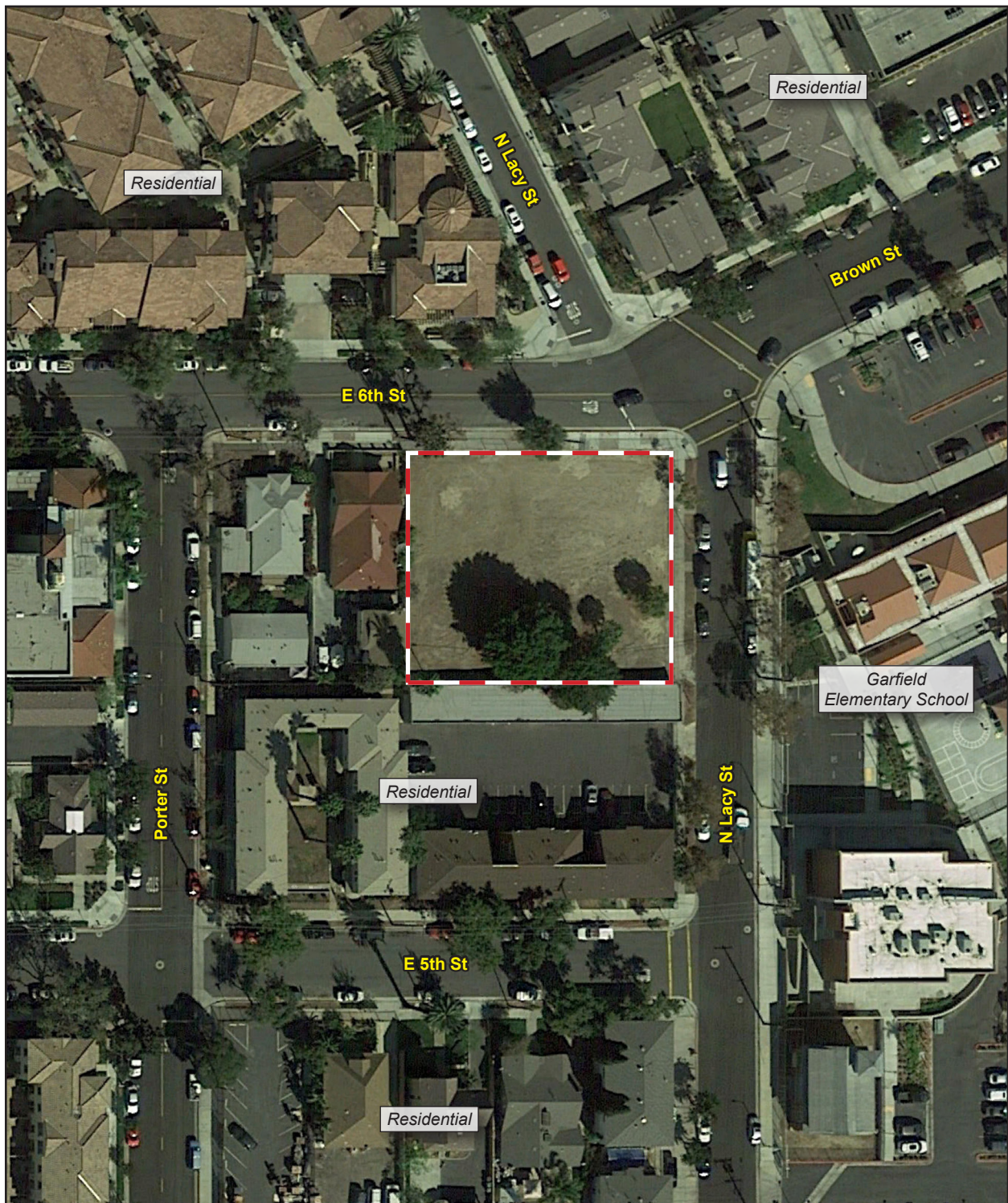


Source: Google Earth Pro, 2018

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Figure 5 - Aerial Photograph - 6th Street Site (Site 1)



— 6th Street Site (Site 1)

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Scale (Feet)



Source: ESRI, 2018

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Figure 6 - Aerial Photograph - Raitt Street Site (Site 2)



— Raitt Street Site (Site 2)

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Scale (Feet)



Source: ESRI, 2018

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Figure 7 - Aerial Photograph - McFadden Site/Pacific Electric Park (Site 3)



— McFadden Site/Pacific Electric Park (Site 3)

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Scale (Feet)



Source: ESRI, 2018

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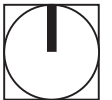
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Figure 9 - Conceptual Site Plan - Raitt Street Site (Site 2)



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Scale (Feet)



1. Proposal Description

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2. Environmental Consequences

2.1 ENVIRONMENTAL SCOPING

The Environmental Screening Form Analysis below is provided for the 6th Street Site and the Raitt Street Site only, because an EA for the McFadden Site/Pacific Electric Park has already been prepared and reviewed in 2012 by NPS.

2.1.1 ENVIRONMENTAL SCREENING FORM ANALYSIS

Based on an Environmental Screen Form 10-904 (Rev. 09/2016) of the NPS, this section provides an evaluation of the impact categories and questions. For each environmental issue, an analysis identifies the direct, indirect, and cumulative impacts. Where needed, mitigation measures have been identified to avoid or reduce potential environmental impacts.

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
1. Geological resources: soils, bedrock, slopes, streambeds, landforms, etc.		X			
<p>Impact Evaluation: The 6th Street Site and the Raitt Street Site are currently vacant. There are no slope, streambeds, or unique landforms that require further evaluation. No inhabitable structures would be developed as part of the Proposed Action. All grading and recreational facility development would be required comply with the latest California Building Code (CBC) and City Municipal Codes to minimize any impacts related to geotechnical stability.</p> <p>A paleontological records search for the two replacement park sites was performed by the Natural History Museum of Los Angeles County, Vertebrate Paleontology Section, in May 2018. The records search indicated that there are no vertebrate fossil localities that lie within the project site boundaries. However, localities have been identified nearby in the same sedimentary units that are in the project area. Surface sediments throughout the project area consists of younger terrestrial Quaternary Alluvium, derived primarily as alluvial fan deposits from hills of the Santa Ana Mountains to the east. These younger Quaternary deposits typically do not contain significant vertebrate fossils in the upper layers, however, underlain older quaternary deposits at varying depths may contain vertebrate fossils. Therefore, grading or shallow excavations in the upper few feet of the younger quaternary alluvial sediments would not result in any impacts to paleontological resources. However, if any grading or excavation activities has the potential to disturb older quaternary deposits, Therefore, any construction activities that could potentially affect the underlain older quaternary deposits would be monitored by a qualified paleontologist to ensure that impacts are less than significant. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p> <p>Mitigation Measure</p> <p>GEO-1 In the event that soil disturbance is expected in the older quaternary deposits per the site-specific geotechnical report, a qualified paleontologist shall be retained prior to excavation activities and excavation activities in the older quaternary deposits shall be closely monitored. If any are found, work</p>					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required	
A. ENVIRONMENTAL RESOURCES						
in the immediate area shall halt and the specimen and sediment samples shall be collected and evaluated. Any fossils recovered shall be processed per the recommendation of the on-site paleontologist and deposited in an accredited scientific institution.						
2. Air quality			X			
Impact Evaluation:						
Regional Construction Impacts						
The Proposed Action requires construction activities involving grading, building construction, and paving, which would involve various types of construction equipment. Air quality could be impacted during construction. Each park is tentatively scheduled to be constructed over an approximately two-and-a-half-month period. Air pollutant emissions for construction of the new parks are based on the preliminary phasing schedule which includes grading, building construction, and paving.						
The Proposed Action construction-related emissions shown in Table 2, <i>Maximum Daily Regional Construction Emissions</i> , are quantified using California Emissions Estimator Model, Version 2016.3.2 (CalEEMod), and are based on the construction schedule provided and the equipment list recommended for the Proposed Action. Air quality modeling data is contained in Appendix B to this EA. The Proposed Action involves the construction of two community parks in the City of Santa Ana, 6th Street Site is a 0.42-acre site and the Raitt Street Site is a 1.09-acre site. The maximum daily emissions were based on the construction of the largest park, Raitt Street Site, because it would provide a “worst case” scenario or emissions produced for each park. Total maximum daily emissions present emissions from both park sites combined. As shown in the table, air pollutant emissions from construction-related activities would be less than their respective South Coast Air Quality Management District (SCAQMD) regional significance threshold values. Therefore, air quality impacts from project-related construction activities would be less than significant.						
Table 2 Maximum Daily Regional Construction Emissions						
Construction Phase	Criteria Air Pollutant Emissions (lbs/day) ^{1,2,3}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Raitt Street Site – Worst-Case						
Grading	1	16	7	<1	3	2
Building Construction	2	17	14	<1	1	1
Building Construction + Paving	3	26	24	<1	2	1
Raitt Street Site Maximum Daily Construction Emissions	3	26	24	<1	3	2
Total Maximum Daily Construction 6th Street Site + Raitt Street Site	6	52	48	<1	6	4
SCAQMD Regional Significance Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Source: CalEEMod Version 2016.3.2						
Notes: Totals may not total to 100 percent due to rounding.						
1 Construction phasing is based on the preliminary information provided by the applicant. Where specific information regarding Proposed Action-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.						
2 Includes implementation of fugitive dust control measures under SCAQMD Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers. Modeling also assumes a VOC of 100 g/L pursuant to SCAQMD Rule 1113.						
3 Modeling associated with the Raitt Street Site also reflects a conservative evaluation of construction at the 6th Street Site.						

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
Regional Long-Term Operation-Phase Impacts					
Typically, the primary source of new long-term criteria air pollutants generated by a project is mobile-source emissions from vehicle trips. Because both replacement parks would be constructed to serve nearby residences, they are considered as walk-up facilities which would result in negligible additional trip increases or change in traffic volumes (i.e., less than 2 daily trips combined from the 6th Street and the Raitt Street Sites). The Proposed Action does not include the construction of on-site parking or uses that typically generate substantial increases in vehicular traffic such as ball fields and skate parks. Other project-related emissions are derived from area sources (e.g., landscape equipment and aerosol use), building energy (energy use for cooling, heating, and cooking), and on-site off-road equipment; these are analyzed based on the net increase in building square footage. Since the Proposed Action does not include a substantial increase in building square footage, new source air pollution or an increase in onsite emissions would be minimal and would not exceed SCAQMD regional significance threshold values. Therefore, impacts to the regional air quality from project-related operation activities would be less than significant and no mitigation measures are necessary.					
Localized Construction Impacts					
A project could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevated levels. Unlike the mass of construction emissions shown in the regional emissions analysis in Table 2, <i>Maximum Daily Regional Construction Emissions</i> , which are described in pounds per day (lbs/day), localized concentrations refer to an amount of pollutant in a volume of air (parts per million or micrograms per square meter [ppm or $\mu\text{g}/\text{m}^3$]) and can be correlated to potential health effects. Localized significance thresholds (LSTs) are the amount of project-related emissions at which localized concentrations (ppm or $\mu\text{g}/\text{m}^3$) could exceed the AAQs for criteria air pollutants for which the South Coast Air Basin (SoCAB) is designated nonattainment. LSTs are based on the Proposed Action site size and distance to the nearest sensitive receptor. Thresholds are based on the California ambient air quality standards (AAQS), which are the most stringent AAQS, established to provide a margin of safety in the protection of the public health and welfare. They are designed to protect nearby sensitive receptors in source receptor areas (SRA)s most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise.					
Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in air pollutant concentrations. Table 3, <i>Maximum Daily Onsite Localized Construction Emissions</i> , shows the maximum daily construction emissions (lbs/day) generated during onsite construction activities compared with the SCAQMD's LSTs. As shown in the table, project-related construction would not generate emissions that would exceed the LSTs. Therefore, it does not have the potential to expose sensitive receptors to substantial pollutant concentrations. Localized air quality impacts from construction activities would be less than significant.					
Table 3 Maximum Daily Onsite Localized Construction Emissions					
Source	Pollutant Emissions (lbs/day) ^{1,2,3}				
	NO _x	CO	PM ₁₀	PM _{2.5}	
Year 2019 – Grading	16	7	3	2	
SCAQMD 1.09-acre LST	84	506	4	3	
Exceeds LST?	No	No	No	No	
Year 2019 – Building Construction	16	13	1	1	
SCAQMD 1.00-acre LST	81	485	4	3	
Exceeds LST?	No	No	No	No	
Year 2019-2020 – Building Construction + Paving	25	22	1	1	
SCAQMD 1.00-acre LST	81	485	4	3	
Exceeds LST?	No	No	No	No	

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES <p>Source: CalEEMod Version 2016.3.2.; SCAQMD 2008 and SCAQMD 2011.</p> <p>Notes: In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the Proposed Action site are included in the analysis. Construction NOX and CO LSTs are based on non-sensitive receptors within 82 feet (25 meters) in SRA 17. Construction PM₁₀ and PM_{2.5} LSTs are based on sensitive receptors within 82 feet (25 meters) in SRA 17.</p> <p>1 Quantification are based off the Raitt Street Site to provide a maximum or "worst case" scenario of emissions produced.</p> <p>2 Construction phasing is based on the preliminary information provided by the Applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.</p> <p>3 Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.</p> <p>Localized Operation-Phase Impacts</p> <p>Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD include industrial land uses, such as chemical processing and warehousing operations where substantial truck idling could occur onsite. The Proposed Action does not fall within these categories of uses. Although the park sites would have occasional use of landscaping equipment for property maintenance which would generate area source emissions, on-site emissions would not exceed SCAQMD LSTs. Thus, operational emissions would not exceed the California AAQS and project operation would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant.</p> <p>Carbon Monoxide Hotspots</p> <p>Areas of vehicle congestion have the potential to create pockets of carbon monoxide (CO) called hot spots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 part per million (ppm). Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. The SoCAB has been designated as attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). The Proposed Action is anticipated to generate less than less 2 daily trips, there would not be any discernable changes in current travel patterns. The Proposed Action would not substantially increase CO hotspots at intersections in the vicinity, and impacts would be less than significant.</p>					
3. Sound (noise impacts)			X		
<p>Existing Noise Conditions</p> <p>Both the 6th Street and Raitt Street Sites propose skate parks with lighting for evening use. Noise monitoring was conducted at a similar existing skate park with evening hours and lighting (i.e., Harvard Skate Park in the City of Irvine), as described below. In addition, to determine baseline noise levels, an ambient noise measurement was conducted at the existing 6th Street Site.</p> <p>The sound level meter used for noise monitoring (Larson Davis LxT) satisfies the American National Standards Institute (ANSI) standard for Type 1 instrumentation. The sound level meters were set to "slow" response and "A" weighting (dBA). The meters were calibrated prior to and after the monitoring period. All measurements were at least five feet above the ground and away from reflective surfaces. Noise measurement locations are described below and shown in Figure 10, <i>Approximate Noise Monitoring Locations at Harvard Skate Park</i>, and Figure 11, <i>Approximate Noise Monitoring Location at 6th Street Site</i>. Table 4, <i>Short-Term Noise Measurement Levels at Varying Distances (dBA Leq)</i>, shows noise monitoring results from the four short-term noise monitoring locations. Noise-related data is contained in Appendix D to this EA.</p>					

2. Environmental Consequences

Table 4 Short-Term Noise Measurement Levels at Varying Distances (dBA L_{eq})

Monitoring Site	L _{eq}	L _{max}	L _{min}	L ₂	L ₅	L ₂₅	L ₅₀
ST-1, Harvard Skate Park Edge of skate area	62.6	76.1	52.1	69.7	66.2	62.9	60.2
ST-2, Harvard Skate Park 25 feet from skate area edge	55.6	69.6	47.6	61.7	58.8	55.7	54.0
ST-3, Harvard Skate Park 5 feet from skate area edge	58.6	71.1	48.6	63.3	59.0	55.9	53.8
ST-4, 6 th Street Site ambient	47.6	59.9	40.8	54.1	50.5	47.6	45.5

Noise monitoring conducted on March 23, 2019, during the hours of 6:00 PM – 7:30 PM, and March 26, 2019, during the hours of 7:30 PM and 8:00 PM.

Harvard Skate Park

The skate park is approximately 8,000 square feet, and has a couple of rails, one bowl, quarter ramps, several decks, and roll-ins. The skate park is approximately 15 feet north of the nearest residences. There is an approximate 8-foot wall between the skate park and the residences. Three short-term (ST) 15-minute noise measurements were conducted, as described below.

ST-1 was conducted on March 23, 2019, beginning at 6:14 PM. The measurement was taken at the eastern edge of the skate park. Primary noise sources were skating activity and speech. At the time of measurement there were 4 to 6 active skaters and several observers. Noise levels at the park ranged from 52 to 75 dBA L_{eq}. Noise levels associated with the following activities were observed: speech such as talking and cheering ranged from 61 to 68 dBA L_{eq}; wheel to ground contact was observed to be 64 dBA L_{eq}; boards and equipment falling ranged from 66 to 75 dBA L_{eq}, depending on proximity to sound level meter; use of quarter ramps for wheel to ramp contact was observed at up to 70 dBA L_{eq}; and ambient background noise levels ranged from 52 to 57 dBA L_{eq}. Ambient background noise consisted of distant traffic from Jamboree Road, birds, other park uses, and parking lot movement and activity.

ST-2 was conducted on March 23, 2019, beginning at 6:33 PM. The measurement was taken 25 feet east of the skate park edge. Primary noise sources were speech and skating activity. At the time of measurement there were 5 to 6 active skaters and several observers. Sound levels at the park at 25 feet ranged from 51 to 62 dBA L_{eq}. Noise levels associated with the following activities were observed: speech such as talking and cheering ranged from 52 to 62 dBA L_{eq}; skating activity noise from wheel to ramp or ground contact ranged from 59 to 62 dBA L_{eq}; fall impact sound levels were 55 to 65 dBA L_{eq}; and ambient background noise levels were 48 to 52 dBA L_{eq}.

ST-3 was conducted on March 23, 2019, beginning at 6:50 PM. The measurement was taken 10 feet south of the skate park edge and 5 feet north of the wall adjacent to residences. Primary noise sources were speech and skating activity. At time of measurement there were 8 active skaters and several observers. Sound levels at the park at 10 feet ranged from 50 to 70 dBA L_{eq}. Noise levels associated with the following activities were observed: speech such as talking and cheering ranged from 52 to 63 dBA L_{eq}; skating activity noise from wheel to ramp or ground contact ranged from 53 to 70 dBA L_{eq}; fall impact sound levels were up to 65 dBA L_{eq}; and ambient background noise levels were 49 to 51 dBA L_{eq}.

6th Street Site

The 6th Street Site sits in a southwest corner lot of 6th Street and Lacey Street within a residential area. The 6th Street Site is vacant with no above-grade structures. The nearest noise sensitive receptors are surrounding residences and Garfield Elementary School. Residences are adjacent to the 6th Street Site's western and southern property lines, and residences are also located approximately 60 feet north of the site across 6th Street. To the east is Garfield Elementary School, approximately 60 feet away across Lacey Street.

Existing noise conditions mostly consist of local traffic. The project area lies outside the 65 dBA CNEL contour per the City of Santa Ana's Noise Element, Exhibit 5, *Transportation Noise Sources*. Other existing noise sources include typical residential neighborhood noises and school related activities, such as student drop-off and pick-up, and outdoor and after-school activities.

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
<p>ST-4 was conducted on March 26, 2019, beginning at 7:24 PM. The measurement was in the southwest corner of the project site and at least 5 feet from existing barriers. Primary noise sources were local traffic and adjacent neighbors to the west playing basketball. Traffic noise was mostly dependent on vehicle, vehicle speed, and acceleration. Smaller cars and SUV's ranged from 46 to 53 dBA L_{eq} and pick-up trucks with louder exhausts were measured up to 59 dBA. Overall, noise levels at the vacant site ranged from 41 to 60 dBA L_{eq}. Noise levels associated with the adjacent neighbors conversing and playing basketball ranged from 44 to 49 dBA L_{eq}. At times where no traffic was present and neighboring activities ceased, ambient background noise levels were as low as 41 dBA L_{eq}.</p> <p><i>Raitt Street Site</i></p> <p>The Raitt Street Site is located at the northeast corner of Myrtle Street and Raitt Street within a residential area. The nearest noise sensitive receptors to the Raitt Street Site are the adjacent residences to the northern and eastern property lines. An existing masonry wall approximately 6 feet in height separates the site and residential uses. There are also single-family residential units to the south across Myrtle Street, and west across Raitt Street, approximately 55 feet and 60 feet from the Site, respectively.</p> <p>Impact Evaluation:</p> <p>The Proposed Action requires construction activities involving grading, building construction, and paving, which would involve various types of construction equipment. Increased noise levels are expected during construction and more data is needed to determine degree of impact.</p> <p>The following construction noise analysis was prepared for the larger of the two replacement park sites, 1.09-acre, Raitt Street Site, as this site represents a worst-case scenario for construction. Both replacement park sites are vacant without any above-grade structures and require mature tree removal; however, Raitt Street Site is larger in size and more park amenities have been proposed compared to 6th Street Site. The nearest sensitive noise receptors from both sites are approximately 70 feet from the center of the construction area. Therefore, temporary noise impacts at 0.42-acre, 6th Street Site, is anticipated to be equal to or less than that of the Raitt Street Site, and the following analysis is applicable to both replacement park sites.</p> <p><i>Construction Noise:</i></p> <p>Construction noise represents a short-term impact on ambient noise levels. Construction activities related to the Raitt Street Site is tentatively scheduled to take approximately 10 weeks. Considering the size and generally flat and vacant condition of the site, is anticipated that the construction-related traffic, in terms of the number of vendor and haul truck events, would be negligible. Therefore, construction-related traffic would not create perceptible noise impacts at noise sensitive uses along nearby roads.</p> <p>Short-term construction noise would be generated from the use of earthmoving equipment, especially during the grading phase. The nearest noise sensitive uses are the residential units bordering the Raitt Street Site to the north and east, and residential units are also located to the south across Myrtle Street and west across Raitt Street. Grading activities associated with the project are expected to occur over a 10-day period. There would be minor earthmoving; with the assumed equipment mix including a grader, rubber tired dozer, and tractor/loader/backhoe.</p> <p>Noise generated by onsite construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest several pieces of equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.</p> <p>The noise produced at each construction stage is determined by combining the equivalent continuous noise level (L_{eq}) contributions from each piece of equipment used at a given time, while accounting for the on-going time-variations of noise emissions (commonly referred to as the usage factor). Heavy equipment, such as a dozer or a</p>					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
<p>loader, can have maximum, short-duration noise levels in excess of 80 to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on what specific activity is being performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dB per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements. Noise levels from project-related construction activities were calculated from the simultaneous use of all applicable construction equipment at spatially averaged distances (i.e., from the acoustical center of the general construction site) to the property line of the nearest receptors. Although construction may occur across the entire phase area, the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors.</p> <p>Based on the default CalEEMOD construction equipment mix, noise levels at various distances to nearby residences were estimated for each construction phase as summarized in Table 5, <i>Noise Levels During Construction</i>. As shown, existing noise sensitive uses surrounding the Raitt Street Site would be exposed to increased noise from construction activities above existing ambient noise levels. The greatest noise impact would be generated during grading phase, which is expected to occur over 10 days. Noise levels during building construction and paving would result in lower noise levels, and would decrease with distance at more distant receptors.</p>					
Table 5 Noise Levels During Construction					
Construction Activity Phase	Residence to North at 70 feet ¹	Residence to South at 100 feet ¹	Residence to East at 225 feet ¹	Residence to West at 280 feet ¹	
Grading	78 dBA	75 dBA	68 dBA	66 dBA	
Building Construction	70 dBA	67 dBA	60 dBA	58 dBA	
Paving	74 dBA	71 dBA	64 dBA	62 dBA	
Source: Roadway Construction Noise Model (RCNM), FHWA, 2008. Note: 1 As measured from the acoustical center of the construction site to the nearest sensitive receptor property line					
Project-related Roadway Noise The City's General Plan Noise Element establishes a noise standard of 65 dBA community noise equivalent level (CNEL) for exterior residential areas. The proposed parks are both intended to be walk-up parks that would primarily serve the local neighborhood. As such, no vehicle parking will be constructed, and the project-related trips would be limited to maintenance workers and some park visitors. The 6th Street Site is anticipated to generate 0.33 daily trips and the Raitt Street Site is anticipated to generate 0.85 daily trips. In general, to create a 3 dBA CNEL increase in traffic-generated noise levels (i.e., barely detectable), a doubling of traffic flows (i.e., 10,000 vehicles per day to 20,000 per day) would be needed. Therefore, such a minor increase in traffic volumes on the streets in the vicinity of the replacement park sites (less than 1 trip per day on average) would not result in significant traffic noise increase and this would be a less-than-significant impact. The Proposed Action would not generate noise levels in excess of applicable standards.					
Stationary-Source Noise The results of noise monitoring at ST-4 indicate that existing ambient noise levels are approximately 46 dBA L50 at the 6th Street Site during evening hours. Since a change of 5 dBA would be considered readily discernable, this is used as the threshold for potentially significant impacts. The results of ST-2 and ST-3 measurements indicate that L50 noise levels are approximately 54 dBA 5 – 25 feet from the edge of the skate area. The nearest residences to					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
<p>the proposed skate area are approximately 5 feet to the west and southwest. The existing garages on the southern property line would reduce noise levels by at least 5 dBA by breaking line-of-sight, resulting in noise levels of 49 dBA L50 at the residences to the south, which would not create an ambient noise increase of 5 dBA L50 or more. The single-story residences immediately adjacent to the west and the two-story apartments immediately adjacent to the southwest could be exposed to ambient noise level increases of up to 8 dBA L50, which is considered potentially significant. Therefore, Mitigation Measure NOISE-1, which provides two options, would be required to reduce this impact to a level of less than significant.</p> <p>Although noise from the skate area would be readily discernable from the adjacent residential uses, the noise increase would not be considered a substantial permanent increase in ambient noise levels in the vicinity given that the skate park operating hours would be restricted to 8 PM under MM NOI-1. Provided that skating area is closed by 8 PM, when residences are reasonably anticipated to conduct normal household activities, not before typical quiet hours to begin (e.g., 10 PM), even though some residences to the west and southwest could be exposed to ambient noise level increases of up to 8 dBA L50, it would not be considered a substantial permanent increase. It should also be noted that Section 18.314 of the City's Noise Ordinance specifically excludes noise from activities conducted at any park or playground owned and operated by a public entity. Therefore, with mitigation, impacts would be considered less than significant.</p> <p>Alternatively, a 10-foot noise barrier wall could be constructed along the western and southern boundary to block the line of sight from the western and southwestern residences. With the minimum 10-foot barrier, the ambient noise increase is predicted to be reduced by at least 5 dBA. Therefore, the ambient noise increase would be reduced to 49 dBA L50 or less (i.e., up to 3 dBA increase). Therefore, compared to existing ambient noise levels of approximately 46 dBA L50, the proposed project would not cause ambient noise levels to increase by 5 dBA or more (readily discernable to most people). Implementation of MM NOI-1 would ensure that impacts are reduced to a less than significant level.</p> <p>The nearest residences to the proposed skate area at the Raitt Street Site are approximately 25 feet to the north. Additionally, there is an existing wall on the northern and eastern property lines, therefore reducing noise levels by approximately 5 dBA by breaking line-of-sight. The residences to the west and south are over 100 feet from skate area. Although no site-specific noise monitoring was conducted, it is assumed that the ambient noise level would be similar to that of the 6th Street Site at 46 dBA L50. Because the nearest residences to the north are one-story buildings, and the existing wall breaks the line-of-sight from the skate area, the ambient noise increase would be reduced by at least 5 dBA, and the noise increase is projected to be about 3 dBA L50, therefore, impacts would be considered less than significant without mitigation for the Raitt Street Site.</p> <p>Mitigation Measures</p> <p>NOI-1 The City of Santa Ana shall turn off park lights and restrict operating hours of the skate area at the 6th Street Site to no later than 8:00 PM to reduce evening noise levels at adjacent residential uses;</p> <p>Or</p> <p>The City of Santa Ana shall construct a noise barrier along the western and southern property lines adjacent to the skate area of the 6th Street Site. The barrier shall be continuous from grade to top, with no cracks or gaps, and have a minimum surface density of four pounds per square foot. A minimum barrier height of 10 feet at the 6th Street Site, as measured from the base elevation, shall be provided.</p>					
4. Water quality/quantity			X		
Impact Evaluation:					
6th Street Site					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
<p>The 6th Street Site is approximately 0.4-acre and is within the jurisdiction of the Santa Ana Regional Water Quality Control Board (SARWQCB). The site is currently vacant with exposed soils and some mature trees. Urban storm runoff during in urban area can carry pollutants to receiving waters. Runoff can contain pollutants such as oil, fertilizers, pesticides, trash, soil, and animal waste.</p> <p>The Proposed Action would slightly increase onsite impervious surfaces as shown in the conceptual site plan. A vital component to improving the quality of the Proposed Action site's stormwater is through the permitting process. Because the Proposed Action would disturb less than one acre of soils, construction on the 6th Street Site would not be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater permit (GCSP) and is not required submit a Storm Water Pollution Prevention Plan (SWPPP) for construction. Considering the size of the project site and limited scale that does not include any permanent building development, limited soil excavation would occur, and with standard temporary Best Management Practices (BMPs) during the construction period, water quality impacts during construction would not be significant.</p> <p>The permanent or post-construction structural and/or treatment control BMPs would be planned and designated by the City to ensure that the post-construction runoff volume does not worsen compared to the existing conditions. New development projects that create 10,000 square feet or more of impervious surface and redevelopment projects that add or replace 5,000 square feet of impervious surface are required by Orange County's Municipal Separate Storm Sewer System (MS4) permit to retain onsite a specified volume of stormwater runoff from a design storm event and prepare a water quality management plan (WQMP) for submittal and approval by the permitting agency. Development of the 6th Street Site is anticipated to create more than 10,000 square feet of impervious surface, therefore, the conceptual design includes rock bio-swale to manage and control runoff and development of the 6th Street Site would not result in increased runoff volume compared to the existing conditions. Although the proposed park would include a community garden and fruit trees that may require use of limited herbicides, any use would be limited to small quantities like household gardening practices. Other recreational or park uses are not known to generate stormwater runoff pollutants that could violate applicable water quality standards. Water quality impacts would be minor.</p> <p>Raitt Street Site</p> <p>The Proposed Action would alter the existing drainage pattern at the site, which could contribute additional sources of polluted runoff to the existing drainage system if not properly managed. The Raitt Street Site is approximately 1.09 acres and could potentially disturb more than one acre of soil. Therefore, Proposed Action on the Raitt Street Site would be subject to the requirements of NPDES General Permit. As part of the permitting process, the City would be required to submit a SWPPP, which requires the Proposed Action to not only incorporate temporary BMPs during the construction period, but also, to the maximum extent possible, incorporate permanent or post-construction BMPs in project planning and design.</p> <p>The City is subject to the waste discharge requirements of Orange County MS4 permit and is required to comply with the County's Drainage Area Management Plan (DAMP). New development projects that create 10,000 square feet or more of impervious surface and redevelopment projects that add or replace 5,000 square feet of impervious surface are required by Orange County's MS4 permit to retain onsite a specified volume of stormwater runoff from a design storm event and prepare a WQMP for submittal and approval by the permitting agency. Development of the Raitt Street Site is anticipated to create more than 10,000 square feet of impervious surface; therefore, the conceptual design includes rock bio-swale to manage and control runoff and development of the Raitt Street Site would not result in increased runoff volume compared to the existing conditions. Although the proposed park would include a community garden and fruit trees that may require use of limited herbicides, any use would be limited to small quantities similar to household gardening practices. Other recreational or park uses are not known to generate stormwater runoff pollutants that could violate applicable water quality standards. Water quality impacts would be minor.</p>					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
5. Stream flow characteristics		X			
Impact Evaluation: Both replacement park sites do not contain any streams or water bodies. The closest river is the Santa Ana River which is located approximately 2.7 miles and 1 mile to the west of the 6th Street Site and Raitt Street Site, respectively. Stream flow characteristics would not be impacted by the Proposed Action.					
6. Marine/estuarine	X				
Impact Evaluation: Both replacement park sites do not contain marine/estuarine resources. The 6th Street and Raitt Street Sites are in an urban area, and there are no marine resources on or adjacent to the sites. Pacific Ocean is over 10 miles 8.5 miles inland from the 6th Street Site and the Raitt Street Site, respectively. No adverse impacts to marine/estuarine resources are anticipated. No impact is anticipated.					
7. Floodplains/wetlands		X			
Impact Evaluation: 6th Street Site <i>Floodplains</i> The 6th Street Site is within the FEMA Flood Insurance Rate Map's (FIRM) flood zone X, area of minimal flood hazard. Zone X represents area subject to inundation by the 0.2 percent annual chance flood hazard, areas of 1 percent annual change flood with average depth less than one foot or with drainage areas of less than one square mile (Map ID# 06059C0276J) (FEMA 2009a). 6th Street Site is not in the base floodplain, which has a one percent or greater change of flooding in any given year, and no further evaluation is necessary. <i>Wetlands</i> The 6th Street Site is in an urbanized area and does not contain any wetland as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to marsh, vernal pool, coastal, etc.) and no such wetlands exist in the vicinity (USFWS 2017). No impacts to wetland would occur, and no further evaluation is necessary. Raitt Street Site <i>Floodplains</i> The Raitt Street Site is within the FEMA FIRM flood zone X, zone D overlay. Zone x represents area subject to inundation by the 0.2 percent annual chance flood hazard, area of 1 percent annual change flood with average depth less than one foot or with drainage areas of less than one square mile, and zone D represents area with flood risk due to levee (Map ID# 06059C0257J) (FEMA 2009b). The Raitt Street Site is not in the base floodplain, which has a one percent or greater change of flooding in any given year, and no further evaluation is necessary. <i>Wetlands</i> The Raitt Street Site is in an urbanized area and does not contain any wetland as defined by Section 404 of the CWA (including, but not limited to marsh, vernal pool, coastal, etc.) and no such wetlands exist in the vicinity (USFWS 2017). No impacts to wetland would occur, and no further evaluation is necessary.					
8. Land use/ownership patterns; property values; community livability		X			
Impact Evaluation: 6th Street Site 6th Street Site is currently vacant and is zoned O (Open Space). Implementation of the Proposed Action would be consistent with the existing land use designation, therefore, would not degrade property values or community livability. Provision of additional recreational facilities in the community would enhance community livability. Raitt Street Site The Raitt Street Site is currently vacant and is designated as Low Density Residential (LR-7) and zone R1 (Single Family Residential). Open space and recreational uses are not identified as permitted uses in the R1 district,					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required		
A. ENVIRONMENTAL RESOURCES							
therefore, a zone change would be required to develop a park on the Raitt Street Site. However, implementation of the Proposed Action would be consistent with the land use goals of the City's General Plan, as it supports and improves the character and integrity of the neighborhood and quality of life. Development and operation of a neighborhood park would be compatible with the surrounding residential uses and no significant environmental impacts are anticipated.							
9. Circulation, transportation			X				
Impact Evaluation:							
6th Street Site							
The Proposed Action would result in negligible increase in traffic volumes on the streets in the vicinity from park employees, maintenance workers, and some users of the park would drive to and from the proposed park. The streets that provide access to the park site include 6th Street, Lacey Avenue, which abuts the north and east side of the park site. The volumes of traffic that would be generated by the park would be negligible because the park is proposed to be a walk-up facility that would serve the nearby residential neighborhood. As currently proposed, the park would not include athletic fields, a gymnasium, or other types of uses that typically generate substantial volumes of vehicular traffic.							
The trip generation rates and the anticipated volumes of traffic that would be generated by the replacement parks are shown in Table 6, <i>Project Generated Traffic</i> . The trip rates reflect the average values shown in the Trip Generation Manual (ITE 2017) for public park land use category (ITE Code 411). Development of the 6th Street Site would generate 0.33 daily trips. When combined with trips from the Raitt Street Site, the total trip would be 1.18 daily trips.							
Table 6 also provides AM and PM peak hour trip generations for a large skate park in Huntington Beach (approximately 0.8 acres). As shown, a large skate park with spectator seats would have weekday AM and PM trip generation rate of 0.3 and 1.36 per thousand square feet, respectively. Therefore, a 1,500 square feet skate area with no spectator seating is conservatively projected to generate 0.45 trip in the AM peak hour and 2 trips in the PM peak hour. Such increase in trips would not result in significant traffic impact. The proposed project's impacts on existing roadway conditions would be negligible.							
Table 6 Project Generated Traffic							
Land Use	Daily	In	Out	Total	In	Out	Total
Trip Generation Rates ¹							
Public Park (trips per acre)	0.78	0.01	0.01	0.02	0.06	0.05	0.11
Generated Traffic Volumes							
6th Street Site (0.42 acres)	0.33	0.0042	0.0042	0.0084	0.0252	0.021	0.0462
Raitt Street Site (1.09 acres)	0.85	0.0109	0.0109	0.0218	0.0654	0.0545	0.1199
	1.18	0.0151	0.0151	0.0302	0.0906	0.0755	0.1661
Skate Park Trip Generation Rates ²							
Weekday trips per TSF		0.16	0.14	0.30	0.63	0.73	1.36
Weekend trips per TSF		0.98	0.89	1.86	0.72	0.69	1.41
Generated Traffic Volumes							
6th Street Site (1.5 TSF) Weekday		0.24	0.21	0.45	0.95	1.10	2.04
Raitt Street Site (4 TSF) Weekday		0.64	0.56	1.2	2.52	2.92	5.44
Total		0.88	0.77	1.65	3.47	4.02	7.48

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
Source: ITE Code 411 Trip Generation Manual 10 th Edition, 2017. ¹ Trip generation rates for peak hour of adjacent street.					
<p>Construction would be temporary and considering the size and scale of the proposed park, which would be 0.42 acres and no building area, relatively minor construction traffic would occur as compared to the existing traffic volumes on the streets in the project area. Impacts would be less than significant.</p> <p>Raitt Street Site As shown in Table 6, development of the Raitt Street Site would generate 0.85 daily trip. When combined with trips from the 6th Street Site, the total trip would be 1.18 daily trips. The Raitt Street Site would also include approximately 4,000 square feet of skating area. As shown in Table 6, the 4,000 square feet of skate area is anticipated to generate 1.2 weekday trips and 5.44 weekday trips in AM and PM peak hours, respectively. Considering that the skate park trip generation is based on a large skate park with spectator seating, small scale skate areas in the replacement park sites without any spectator seating that serves local community would actually generate less trips than evaluated in Table 6. The proposed project's impacts on traffic conditions would be negligible.</p> <p>Construction would be temporary and considering the size and scale of the proposed park, which would be 1.09 acres and no permanent building area other than the restroom building, relatively minor traffic would occur as compared to the existing traffic volumes on the streets in the project area. Impacts would be less than significant.</p> <p>Non-motorized Transportation and Transit The project would generate a demand for non-motorized travel as the proposed park would result in additional pedestrians, bicycles, and skaters in the project area. The streets in the project vicinity have sidewalks along both sides of the street and the signalized intersections are equipped with painted crosswalks, pedestrian signals, and pedestrian push buttons to activate the signals. The 6th Street Site fronts two straight streets, both equipped with sidewalks. Because this site is adjacent to Garfield Elementary School, two crossing stripes are present on Lacy Street and 6th Street. The Raitt Street Site also fronts two straight streets, both equipped with sidewalks. However, the adjacent intersections are unsignalized and no crossings are present. Although the replacement park sites do not exhibit inherently dangerous design features or incompatible uses adjacent to the sites, the adjacent intersections are unsignalized and lacks safe crossing features. Therefore, increased safety features such as crossing stripes would be required to improve safety of the park users. Therefore, increased pedestrian activities at the Raitt Street Site would require additional safety features. The City of Santa Ana would be required to provide appropriate safety features such as crossing stripes to ensure safe routes to and from the proposed park.</p> <p>The proposed project would not adversely affect the performance of these transit or non-motorized transportation facilities and would not conflict with any plans or policies relative to these transportation modes.</p> <p>Mitigation Measure TRAN-1 City of Santa Ana shall provide pedestrian crossing features under the supervision of a licensed civil or traffic engineer, approved by the City of Santa Ana Public Works Department.</p>					
10. Plant/animal/fish species of special concern and habitat; state/federal listed or proposed for listing			X		
<p>Impact Evaluation:</p> <p>6th Street Site The 6th Street Site was previously developed with residential uses until 2016 and does not contain any plant, animal, or fish of special concern. The site contains four trees and there is no native vegetation suitable to provide sensitive habitats. The site has been previously disturbed and surrounded by various urban development. No endangered, rare, threatened, or special status plant or wildlife species designated by the US Fish and Wildlife</p>					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
<p>Service (USFWS), California Department of Fish and Wildlife (CDSW), or California Native Plant Society (CNPS) are known to occur on this site. No known regional wildlife corridors or any other sensitive biological areas as indicated by the USFWS Critical Habitat portal or CDFW BIOS (USFWS 2018a, CDFW 2018).</p> <p>However, there are existing mature trees that could be used for nesting by migratory birds. When removing trees or vegetation, in compliance with California Fish and Wildlife Code Sections 3503, 3503.5, 3513, and 3800, the proposed project is required to avoid the incidental loss of fertile eggs or nestlings or nest abandonment. Therefore, if removal of the vegetation occurs during nesting season (typically between January 15 and September 1), the city is required to conduct preconstruction nesting bird surveys in accordance with the California Department of Fish and Wildlife requirements prior to removal of the trees. If nesting birds are found, the city is required to consult with the US Fish and Wildlife Service regarding means to avoid or minimize impacts to nesting birds in accordance with applicable California Fish and Wildlife Code requirements. Compliance with the existing regulation would ensure that the proposed project does not interfere substantially with the movement of any native resident or wildlife species or with established native resident or migratory wildlife corridors. The Migratory Bird Treaty Act (MBTA) (United States Code, Title 16, Sections 703-712) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. MBTA prohibits direct impacts to nesting birds and their nests except under a valid permit or as permitted in the implementing regulations. USFWS administers permits to take migratory birds in accordance with the MBTA. In December 2017, the Department of the Interior issued a memorandum concluding that "consistent with the text, history, and purpose of the MBTA, [the statute's prohibitions on take apply] only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs" (emphasis added) (DOI 2017). Therefore, take of a migratory bird or its active nest (i.e., with eggs or young) that is incidental to, and not the purpose of, a lawful activity does not violate the MBTA. To provide guidance in implementing and enforcing this new direction, the USFWS issued a memorandum in April 2018 to clarify what does and does not constitute prohibited take (USFWS 2018). Compliance with the existing California Fish and Wildlife regulations would ensure that impacts to migratory birds are reduced to a less than significant level.</p> <p>Raitt Street Site</p> <p>Raitt Street Site is vacant with seven trees and no native vegetation suitable to provide habitat for sensitive or special status species. There is no riparian habitat on or near the site and the site is surrounded by various urban development. No endangered, rare, threatened, or special status plant or wildlife species designated by USFWS, CDSW, or CNPS are known to occur on this site. No known regional wildlife corridors or any other sensitive biological areas as indicated by the USFWS Critical Habitat portal or CDFW BIOS (USFWS 2018a, CDFW 2018).</p> <p>However, there are existing mature trees that could be used for nesting by migratory birds. As discussed above for the 6th Street Site, compliance with the applicable California Fish and Wildlife Code would ensure that impacts to migratory birds are reduced to a less than significant level.</p>					
11. Unique ecosystems, such as biosphere reserves, World Heritage sites, old growth forests, etc.		X			
<p>Impact Evaluation: The 6th Street and Raitt Street Sites are both vacant with some mature trees. However, no native vegetation suitable to provide habitat for sensitive or special status species. The site has been previously disturbed and surrounded by various urban development. No unique ecosystems or natural biological habitats are identified by the USFWS Critical Habitat portal or CDFW BIOS (USFWS 2018a, CDFW 2018).</p>					
12. Unique or important wildlife/ wildlife habitat		X			
<p>Impact Evaluation: The 6th Street and Raitt Street Sites are both vacant with some mature trees. The site has been previously disturbed and surrounded by various urban development. No unique or important wildlife and/or wildlife habitats within or near the replacement park sites. No unique ecosystems or natural biological habitats are identified by the USFWS Critical Habitat portal or CDFW BIOS (USFWS 2018a, CDFW 2018).</p>					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
13. Unique or important fish/habitat		X			
Impact Evaluation: The 6th Street and Raitt Street Sites are both vacant with some mature trees. There are no water resources suitable for fish and/or riparian habitat on or near the site. The site has been previously disturbed and surrounded by various urban development (USFWS 2017).					
14. Introduce or promote invasive species (plant or animal)		X			
Impact Evaluation: The Proposed Actions would provide landscaping in association with the proposed park use, such as, but not limited to natural grass turf, ornamental shrubs, and trees, as designed by a landscape architect. The 6th Street and Raitt Street Sites are in highly urbanized neighborhoods, and the park landscaping would be maintained by the City. The Proposed Actions would not introduce or promote invasive plant or animal species.					
15. Recreation resources, land, parks, open space, conservation areas, rec. trails, facilities, services, opportunities, public access, etc.			X		
<p>Impact Evaluation: The Proposed Action would create new recreational facilities in an underserved park-poor area of the City. The nearest neighborhood park from the 6th Street Site is French Park, approximately 0.28 miles to the northwest. French Park is approximately 0.2-acre, passive park with benches. Chepas Park/Logan Recreation Center is approximately 0.33 mile to the northeast, approximately 0.4 acre and contains a recreation center, playground equipment, two handball courts, and seating areas. Garfield Elementary School is adjacent to the 6th Street Site to the east, and the City of Santa Ana has a joint agreement with the Santa Ana Unified School District for use and maintenance of the community center.</p> <p>The nearest park from the Raitt Street Site is Jerome Park, approximately 0.42 mile the south. Jerome Park is a 14-acre park located adjacent to Monte Vista Elementary School. Jerome Park provides trails, athletic fields, swimming pool, community center, and a senior center. The City of Santa Ana also has a joint agreement with Santa Ana Unified School District for the use of the athletic field. The Raitt Street Site is identified as future park site by the City of Santa Ana.</p> <p>The Proposed Action would create new recreational facilities in an underserved park-poor area of the City in lieu of the approximately 2.6-acre CEC Site in the 87-acre Centennial Park. The proposed replacement parks are intended to be a walk-up park that would primarily serve the local neighborhood without dedicated parking lot. The Proposed Action is intended to enhance recreational resources within the City that is currently being underserved. As determined by the Recreation Value Assessment prepared in August 2018, the replacement park sites would provide equal or greater value compared to the CEC Site. The Proposed Action would enhance recreational resources within the City, as it would create new recreational opportunities. No adverse impacts are anticipated.</p>					
16. Accessibility for populations with disabilities		X			
Impact Evaluation: The Proposed Action would provide adequate access for population with disabilities in compliance with the Americans with Disabilities Act (ADA). Both sites are generally flat, and no special conditions exist that could inhibit inadequate access for population with disabilities. No significant environmental impacts are anticipated with the Proposed Action.					
17. Overall aesthetics, special characteristics/ features		X			
<p>Impact Evaluation:</p> <p>6th Street Site</p> <p>6th Street Site is currently vacant with no above-grade structures. There are four mature trees and some ruderal vegetation. The site was previously developed as residential uses and surrounded by various urban uses. No unique or special visual feature exists onsite. The proposed park would include landscaping and various park</p>					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
amenities to provide visual relief from surrounding urban uses. The area is not part of any protected viewsheds and implementation of the Proposed Action would improve the overall aesthetic quality of the site and the area.					
Raitt Street Site Raitt Street Site is currently vacant with no above-grade structures and no unique or special visual feature exists onsite. There are mature trees and some ruderal vegetation. Development of a park would include landscaping and various park amenities to provide visual relief from surrounding urban uses. The area is not part of any protected viewsheds and implementation of the Proposed Action would improve the overall aesthetic quality of the site and the area.					
18. Historical/cultural resources, including landscapes, ethnographic, archeological, structures, etc. Attach SHPO/THPO determination.		X			
Impact Evaluation: 6th Street Site A Cultural Resources Study was prepared for the 6th Street Site prior to the demolition of three single-family residences in January 2016 by Rincon Consultants, Inc. (Rincon) (Appendix C to this EA). Based on records search, intensive pedestrian survey of the area of potential effects (APE), and consultation with applicable tribal groups and local historical society, the Cultural Resources Study determined that the residences were ineligible for the inclusion in the federal, state, or local historical resources listing and that no further evaluation was deemed necessary. 6 th Street Site is currently vacant and no above-grade structures are present. National Historic Preservation Act (NHPA), Section 106 (US Code Title 54) requires federal agencies to take into account the effects of their undertakings on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) with a reasonable opportunity to comment. In addition, Federal agencies are required to consult on the Section 106 process with State Historic Preservation Offices (SHPO), Tribal Historic Preservation Offices (THPO), and Indian Tribes. Historic properties are any prehistoric or historic districts, sites, buildings, structures, or objects that are eligible for or already listed in the National Register of Historic Places (NRHP). Also included are any artifacts, records, and remains (surface or subsurface) that are related to and located within historic properties and any properties of traditional religious and cultural importance to Tribes or NHOs. There are no eligible or listed NRHP within the site, and appropriate consultation efforts were made with the applicable agencies and tribal groups, and Rincon determined that no historical, archaeological, or tribal resources were identified as within or adjacent to the subject property. Therefore, no further consideration pertaining to Section 106 is required. However, although no previously identified historical/cultural resources exists onsite, mitigation measures have been incorporated to account for the unanticipated discovery of subsurface cultural resources during soil excavation beyond artificial fill materials. Raitt Street Site A Cultural Resources Study was prepared in January 2016 for the Raitt Street Site (Appendix C to this EA) The site was vacant at the time of report preparation. A field survey, archival research, cultural resources records search, and Native American consultation were conducted. Based on the results of the records search, Native American scoping, and local consultation, no previously recorded archaeological resources were identified within the subject site. Intensive pedestrian survey was conducted and found items subsequently determined as historical refuse scatter (HRS-01-2016), ineligible for listing on the National Register of Historic Places (NRHP), therefore, required no further management consideration under National Historic Preservation Act (NHPA). No further consideration pertaining to Section 106 is required. However, mitigation measures have been incorporated to account for unanticipated discovery of subsurface cultural resources during soil excavation beyond artificial fill materials.					

2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
Mitigation Measures					
<p>CUL-1 During initial ground-disturbing activities that extend beyond artificial fill materials, an archaeological spot monitoring shall be provided. Should archaeological resources, including tribal resources, be found, work within 25 feet of the find must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology must be contacted, and the qualified monitor shall first determine whether the resource is a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines (14 California Code of Regulations [CCR]), or "tribal cultural resources" pursuant to Public Resources Code Section 21074. Once the determination is made pursuant to CEQA Guidelines Section 21083.2, the appropriate actions shall be taken in appropriate sections of the regulations (e.g., 14 CCR §15126.4) to ensure that impacts are reduced to a less than significant level.</p> <p>And if prehistoric human remains are discovered, the responsible county coroner shall notify the Native American Heritage Commission, which will determine and notify a most likely descendent (MLD). The MLD shall complete the inspection of the area of potential effects within 48 hours of notification and the City of Santa Ana shall comply with the treatment recommendations by the MLD.</p> <p>TCR-1 If the professional archaeologist implementing Mitigation Measure CUL-1 believes that a cultural resource encountered onsite is of "tribal cultural resources" pursuant to Public Resources Code Section 21074, the archaeologist shall notify representatives of Native American tribes with traditional territories in the project region. If requested by the Native American tribe(s), the developer or archaeologist on-call shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, return of artifacts to tribe). If the resources are Native American in origin, a tribal monitor from the consulting tribe shall be present during the remaining site-grading activities.</p>					
19. Socioeconomics, including employment, occupation, income changes, tax base, infrastructure		X			
<p>Impact Evaluation: The Proposed Action would not result in significant impacts related to socioeconomics as it would serve residents in park poor areas of the city. It would improve the accessibility to parks since residents could walk to these replacement park locations where there were limited recreational opportunities. Consequently, the Proposed Action would increase recreational resources within the City in an area that has been identified with a high amount of need for such resources. The Proposed Action would not create permanent employment, occupation, or tax-base. Although additional employment related to construction would be generated, it would be temporary and would not affect the socioeconomics of the city. The replacement park sites have been previously developed and are in highly urbanized area that are already being served by various infrastructure. No significant impacts are anticipated.</p>					
20. Minority and low-income populations		X			
<p>Impact Evaluation: The Proposed Action would result in beneficial impacts to minority and low-income population. Compared to the CEC Site, the proposed replacement park sites would offer park and recreational opportunities to populations that are denser, have lower incomes and less education, and skew more toward people of Latino/Hispanic Descent. It is likely that families with fewer economic resources have fewer resources for recreation and entertainment, and thus would benefit greatly from the addition of a park within walking distance of their homes. Furthermore, densely populated communities often include multi-family developments and small residential lots lacking yard space. In these communities, the proposed park sites could provide important recreational opportunities for all. Therefore, the Proposed Action would have beneficial impacts related minority and low-income populations.</p>					

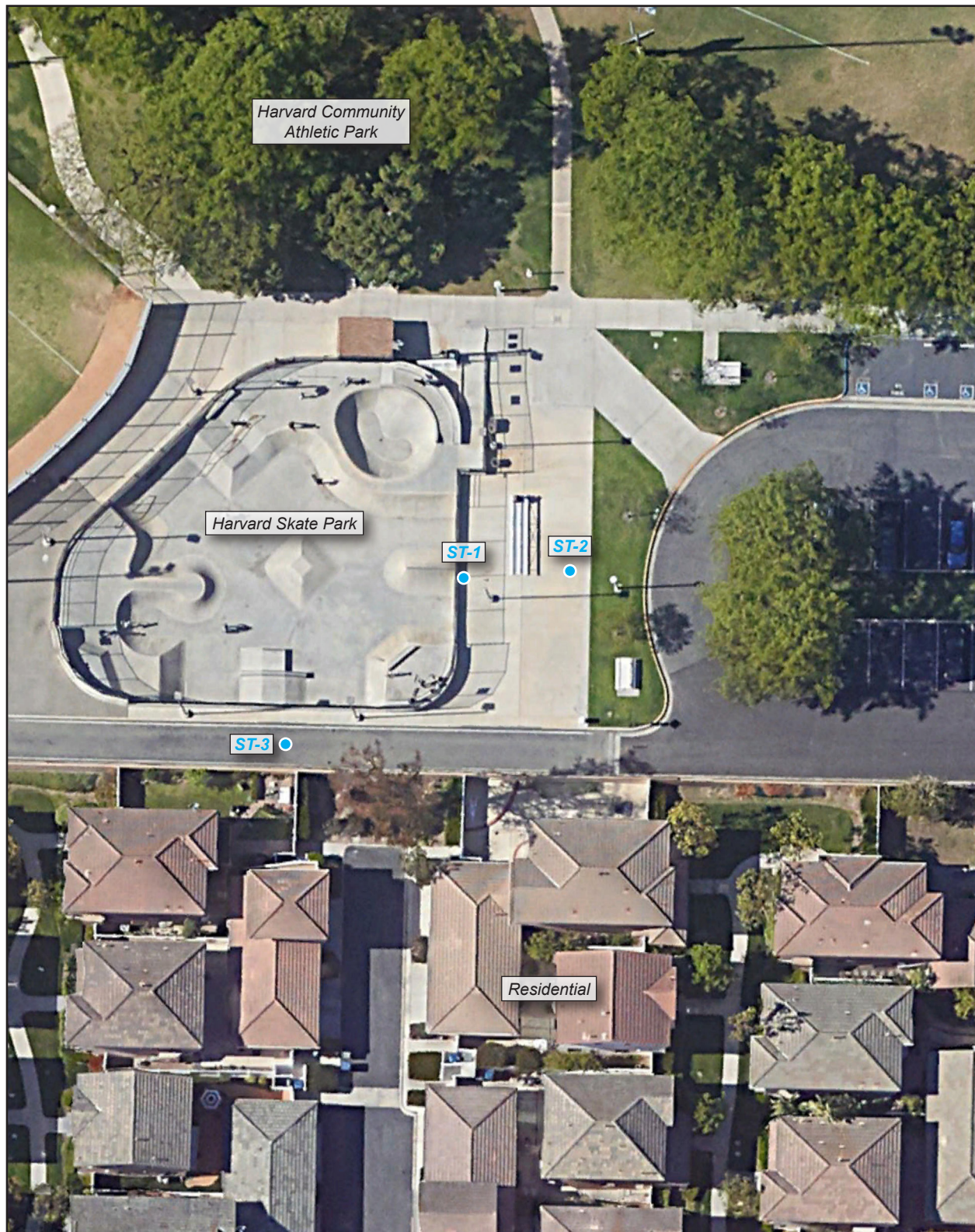
2. Environmental Consequences

	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts	Minor Impacts	Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES					
21. Energy resources (geothermal, fossil fuels, etc.)		X			
Impact Evaluation: Construction and operation of the Proposed Action and its recreational facilities would not require the commitment of significant amounts of energy resources (geothermal, fossil fuels, etc.). Energy resources demands during construction would be largely for construction equipment uses. No inhabitable building area would be developed other than a restroom building and temporary use of the energy resources would not cause significant environmental impact. The Proposed Actions would not involve operation of a building or lighting system that could potentially demand energy resources. Only minor impacts related to energy resources would occur.					
22. Other agency or tribal land use plans or policies		X			
Impact Evaluation: The replacement park sites are owned and maintained by the City of Santa Ana. According to the Native American Heritage Commission (NAHC), the 6th Street and Raitt Street Sites are not listed in the Sacred Lands File (SLF). There are no other agencies or groups who have plans or policies that are applicable to the Proposed Action site. The Proposed Action would not conflict with any tribal land use plans or policies. However, a mitigation measure has been incorporated to account for unanticipated discovery of subsurface cultural resources, including tribal resources, during soil excavation. Mitigation Measure: See Mitigation Measures CUL-1 and TCR-1.					
23. Land/structures with history of contamination/hazardous materials even if remediated		X			
Impact Evaluation: 6th Street Site 6th Street Site was previously developed as residential units and is not included on a list of hazardous materials sites compiled pursuant to California Government Code (CGC) Section 65962.5 and, therefore, would not create a significant hazard to the public or the environment. Section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with 218 reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. A review of the Regional Water Quality Control Board (RWQCB) and Department of Toxic Substances Control (DTSC) regulatory agency databases was conducted to evaluate determine if the site was listed on any database (DTSC 2018, RWQCB 218). 6th Street Site is not listed on any of the dozens of federal, state, and local agency databases searched, including those identified under Section 65962.5. Therefore, the 6th Street Site does not have a history of contamination/hazardous materials. Impacts would not be significant. Raitt Street Site The Raitt Street Site is not included on a list of hazardous materials sites compiled pursuant to CGC Section 65962.5 and, therefore, would not create a significant hazard to the public or the environment. A review of the RWQCB and DTSC regulatory agency databases was conducted to evaluate determine if the site was listed on any database (DTSC 2018, RWQCB 218). The Raitt Street Site is not listed on any of the dozens of federal, state, and local agency databases searched. Therefore, the Raitt Street Site does not have a history of contamination/hazardous materials. Impacts would not be significant.					

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	Not Applicable - Resource does not exist	No/ Negligible Impacts - Exists but no or negligible impacts		Impacts Exceed Minor EA/EIS required	More Data Needed to Determine Degree of Impact EA/EIS required
A. ENVIRONMENTAL RESOURCES			Minor Impacts		
24. Other important environmental resources to address.		X			
Impact Evaluation: The Proposed Action would not result in adverse impacts to other important environmental resources.					

Figure 10 - Approximate Noise Monitoring Locations at Harvard Skate Park



● **ST-1** Short-Term Noise Measurement Locations (3)

0 40
Scale (Feet)



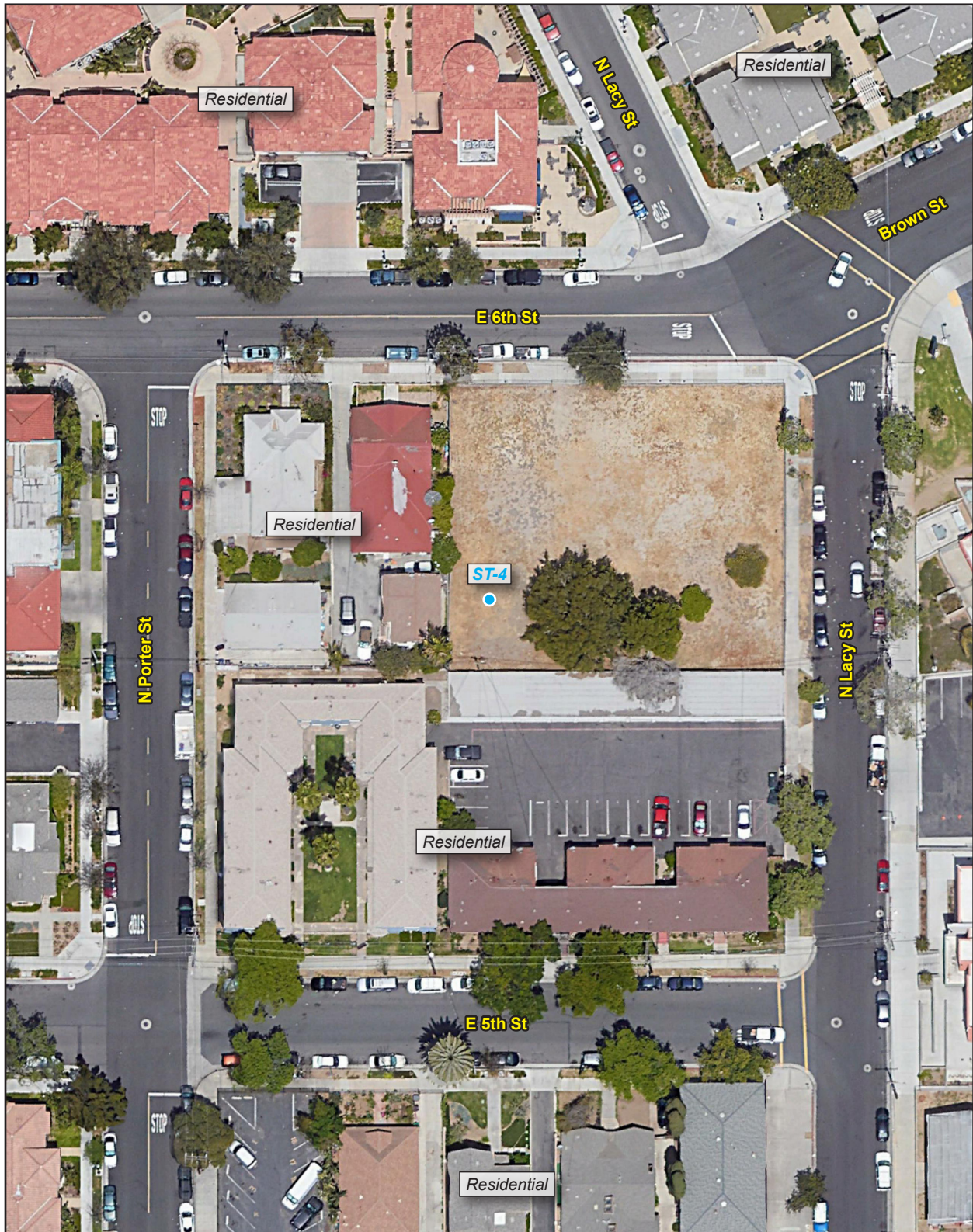
Source: Google Earth Pro, 2019

PlaceWorks

2. Environmental Consequences

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Figure 11 - Approximate Noise Locations at 6th Street Site



● **ST-4** Short-Term Noise Measurement Location (1)

0 70
Scale (Feet)



Source: Google Earth Pro, 2019

2. Environmental Consequences

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2. Environmental Consequences

2.2 MANDATORY CRITERIA

The following table lists mandatory impact criteria used to determine potential impacts of the Proposed Action per the Proposal Description and Environmental Screening Form (PD/ESF), followed by explanation for the response.

Mandatory Criteria Summary			
If the Proposed Action is approved, would it:	Yes	No	To Be Determined
1. Have significant impacts on public health or safety?		X	
2. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands, wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (E.O. 11990); floodplains (E.O. 11988); and other ecologically significant or critical areas.		X	
3. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA section 102(2)(E)]?		X	
4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?		X	
5. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?		X	
6. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?		X	
7. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office. (Attach SHPO/THPO Comments)		X	
8. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species.		X	
9. Violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment?		X	
10. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)?		X	
11. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007)?		X	
12. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area, or actions that may promote the introduction, growth, or expansion of the range of		X	

Would the proposal:

1. Have material adverse effects on public health or safety?

The 6th Street and Raitt Street Sites do not have a history of contamination/hazardous materials, as the sites are not included on a list of hazardous materials sites compiled pursuant to California Government Code (CGC) Section 65962.5. The following databases of hazardous materials sites were searched for listings of hazardous materials on the project site and on surrounding parcels: Geotracker, State Water Resources Control Board; EnviroStor, Department of Toxic Substances Control; and EnviroMapper, US Environmental Protection

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Agency. The agency databases were specifically reviewed to identify known releases that have occurred on or in the immediate area of the project site. No known releases of any hazardous substances are reported to have occurred on the replacement park sites. The 6th Street and Raitt Street Sites are not included in any of the above lists of hazardous sites.

The Proposed Action would not involve the use of any significant quantities of hazardous materials in the construction and maintenance of the park facilities. Hazardous materials associated with the construction of the park facilities would include fuel and lubricating oils associated with heavy equipment and transport vehicles. In addition, the Proposed Action would not involve the routine transport, use, or disposal of any significant quantities of hazardous materials in its operation and maintenance. Therefore, no significant impacts to the public or the environment would result from the Proposed Action. In addition, operation of the completed park facilities would not emit hazardous substances or involve the handling of hazardous or acutely hazardous materials, substances, or waste. Therefore, the Proposed Action would not have significant impacts on public health or safety.

2. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands, wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (E.O. 11990); floodplains (E.O. 11988); and other ecologically significant or critical areas?

Historic or Cultural Resources

6th Street Site

6th Street & Lacey Street Park Project Cultural Resources Study was prepared in January 2016, prior to the demolition of three single-family residences. The report determined that the residences were ineligible for the inclusion in the federal, state, or local historical resources listing and that no further evaluation was necessary. No historical, archaeological, or tribal resources were identified within or adjacent to the 6th Street Site (Rincon 2016a).

Raitt Street Site

Raitt & Myrtle Street Park Project Cultural Resources Study was prepared in January 2016. The site was vacant at the time of report preparation. A field survey, archival research, cultural resources records search, and Native American consultation were conducted. Based on the results of the records search, Native American scoping, and local consultation, no previously recorded archaeological resources were identified within the Raitt Street Site. Although the intensive pedestrian survey found one previously unrecorded archaeological site within the project area of potential effects (APE), this resource was determined to be ineligible for listing on the National Register of Historic Places (NRHP) and required no further management consideration under NRHP.

The investigation conducted through the Natural History Museum of Los Angeles County (NHMLA) indicated that there are no vertebrate fossil localities that lie within the replacement park site boundaries, but localities have been identified nearby from the same sedimentary units that occur in the vicinities of the replacement park sites. Surface sediments throughout the replacement park sites are younger terrestrial Quaternary Alluvium, derived primarily as alluvial fan deposits from the hills of the Santa Ana Mountains. Younger

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Quaternary deposits typically do not contain significant vertebrate fossils but are underlain by older Quaternary deposits at varying depth that could contain vertebrate fossils (NHMLA 2018). The investigation found that grading shallow excavations in the uppermost few feet of the younger quaternary alluvial sediments is unlikely to uncover fossils, while deeper excavations extending down into older quaternary sediments has the potential to uncover fossils. Because both replacement park sites have been previously developed, therefore, onsite soils are comprised of artificial fill, underlain by younger quaternary deposits as indicated by the NHMLA investigation. The Proposed Action would not involve construction of any buildings, and limited grading and excavation would not extend a few feet down to disturb older quaternary deposits. Therefore, the Proposed Actions is unlikely to yield evidence of fossil remains, and impacts would not be significant with respect to paleontological resources.

Park/Recreation/Refuge Lands/Wilderness Areas

Both the 6th Street Site and the Raitt Street Site are vacant and do not contain any structures. The sites have not been previously developed or designated as parks or recreational area, and do not contain natural resources and unique geographic characteristics associated with park, recreation, or refuge lands. Implementation of the Proposed Action would develop vacant sites into a walk-up park to serve the local neighborhoods. These proposed recreational facilities would be compatible with surrounding residential land uses and would provide recreational opportunities in an underserved area of the City.

Wild/Scenic River

There are no wild or scenic rivers in the vicinity of the replacement park sites. The closest river is the Santa Ana River, approximately 2.75 miles and 1 mile west of the 6th Street Site and the Raitt Street Site, respectively. The Santa Ana River is not a wild or scenic river. No impact is anticipated.

National Natural Landmarks

The replacement park sites are vacant and there are no national natural landmarks (Rincon 2016a, 2016b).

Sole or Principal Drinking Water Aquifers

The City of Santa Ana receives its water from two main sources, local well water from the Lower Santa Ana River Groundwater Basin (OC Basin) and imported water from Metropolitan Water District. According to the 2015 Urban Water Management Plan, the City relies on approximately 71 percent groundwater, 28 percent imported water, and 1 percent recycled water. There are three major aquifer systems, the Shallow Aquifer System, the Principal Aquifer System, and the Deep Aquifer System. The Shallow Aquifer system occurs from the surface to approximately 250 feet below ground surface; the Principal Aquifer system occurs at depths between 200 and 1,300 feet below ground surface; and the Deep Aquifer system, which underlies the Principal Aquifer system and is up to 2,000 feet deep in the center of the OC Basin. Over 90 percent of groundwater production is from wells that are screened within the Principal Aquifer system and only a minor amount of groundwater is pumped from the Deep Aquifer system. The replacement park sites and its surrounding area are urbanized and do not represent significant groundwater recharge area. The Proposed Action would not affect any groundwater recharge facilities or groundwater wells. Therefore, no impacts to water aquifers are anticipated.

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The Proposed Action also would not create substantial demands for drinking water during operation to result in extra extraction of groundwater from the aquifers. Impact to drinking water aquifers would not be significant.

Prime Farmland

According to the California Important Farmland Finder for Orange County, prepared pursuant to the Farmland Mapping and Monitoring Program of the Department of Conservation, both replacement park sites are not considered Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and are designated as Urban and Built-up Land (DOC 2016). No impacts would occur.

Wetlands (Executive Order 11990)

No wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to marsh, vernal pool, coastal, etc.) are located on or in the vicinity of the replacement park sites (USFWS 2017). Development of the proposed recreational facilities would not involve any construction activities in areas delineated as wetlands. No direct removal, filling, hydrologic interruption or other adverse impact on federally protected wetlands would occur.

Floodplains (Executive Order 11988)

The 6th Street Site is within the FEMA Flood Insurance Rate Map's (FIRM) flood zone X, area of minimal flood hazard. Zone x represents area subject to inundation by the 0.2 percent annual chance flood hazard, areas of 1 percent annual change flood with average depth less than one foot or with drainage areas of less than one square mile (Map ID# 06059C0276J) (FEMA 2009a). The 6th Street Site is not in the base floodplain, which has a one percent or greater change of flooding in any given year, and no further evaluation is necessary.

The Raitt Street Site is within the FEMA FIRM flood zone X, zone D overlay. Zone x represents area subject to inundation by the 0.2 percent annual chance flood hazard, area of 1 percent annual change flood with average depth less than one foot or with drainage areas of less than one square mile, and zone D represents area with flood risk due to levee (Map ID# 06059C0257J) (FEMA 2009b). The Raitt Street Site is not in the base floodplain, which has a one percent or greater change of flooding in any given year, and no further evaluation is necessary.

3. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA section 102(2)(E)]?

The replacement park sites are located within the City of Santa Ana and is subject to land use designations sited in the City of Santa Ana General Plan. Both sites have been previously developed with residential uses and surrounded primarily by residential uses. Development of recreational facilities in residential surrounding would better serve the park-poor area of the community and not result in highly controversial environmental effects. There are no unresolved conflicts concerning alternative uses of available resources. The 6th Street Site is designated as UN (Urban Neighborhood) by the City of Santa Ana General Plan and zoned O (Open Space). Although the Raitt Street Site is designated as LR-7 (Low Density Residential) by the City of Santa Ana General Plan and zone R1 (Single-Family Residence), where a zone change would be necessary, the proposed

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recreational use on the Raitt Street Site would be compatible with the surrounding land uses and is not anticipated to result in controversial environmental effects.

4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?

No potentially unique or unknown environmental risks have been identified during the Environmental Screening Form preparation. All environmental topics have been determined as having no or less than significant impacts without mitigation, and implementation of the Proposed Action would not result in any potentially significant environmental effects.

5. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?

The two replacement park sites are currently vacant, and the proposed park development would be compatible with the surrounding residential uses. The Proposed Action would not require any zoning or General Plan amendments that would establish a precedent for future action or represent a decision in principle about future actions that could potentially result in significant environmental effects. Development and operation of two passive, walk-up neighborhood parks would not result in significant environmental effects.

6. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?

Implementation of the Proposed Action would not result in cumulative impacts to the environment. The City of Santa Ana is largely built-out and urbanized, including the replacement park sites and their surrounding areas, and do not contain any sensitive habitat or special biological resources. Although there are several mature trees that would be removed or replaced as part of the Proposed Action, the impacts would be considered individual, as they are not protected species. The replacement park sites have been previously developed as residential units, and cultural reports were prepared to identify any potential cultural impacts. The cultural reports determined that site-specific impacts to cultural resources would be less than significant. Therefore, no cumulative significant environmental effects are anticipated. The Proposed Action involves the construction of two passive, walk-up neighborhood parks that would be accessed by foot, and would not create any significant amount of traffic, noise, or other environmental effects that would be incrementally significant.

7. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office.

6th Street & Lacey Street Park Project Cultural Resources Study was prepared in January 2016, prior to the demolition of three single-family residences. The report determined that the residences were ineligible for the inclusion in the federal, state, or local historical resources listing, including the National Register of Historic Places (NRHP), and that no further evaluation was necessary.

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Raitt & Myrtle Street Park Project Cultural Resources Study was prepared in January 2016. The site was vacant at the time of report preparation. A field survey, archival research, cultural resources records search, and Native American consultation were conducted and determined that no resources that are listed or eligible for listing on the NRHP exist onsite. Although an intensive pedestrian survey found historical refuse scatter (HRS-01-2016), they were subsequently determined as ineligible for listing on the NRHP and required no further management consideration under Section 106 of National Historic Preservation Act (NHPA). Implementation of the Proposed Action would not have significant impacts on any of NRHP listed properties.

8. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species.

The 6th Street Site was previously developed with residential uses until 2016 and does not contain any plant, animal, or fish of special concern. The site contains four trees and there is no native vegetation suitable to provide sensitive habitats. The site has been previously disturbed and surrounded by various urban development. No endangered, rare, threatened, or special status plant or wildlife species designated by the USFWS, CDSW, or CNPS are known to occur on this site. No designated critical habitat, or known regional wildlife corridors, or any other sensitive biological areas as indicated by the USFWS Critical Habitat portal or CDFW BIOS (USFWS 2018a, CDFW 2018).

The Raitt Street Site is vacant with seven trees and no native vegetation suitable to provide habitat for sensitive or special status species. There is no riparian habitat on or near the site. The site has been previously disturbed and surrounded by various urban development. No endangered, rare, threatened, or special status plant or wildlife species designated by USFWS, CDSW, or CNPS are known to occur on this site. No designated critical habitat, or known regional wildlife corridors, or any other sensitive biological areas as indicated by the USFWS Critical Habitat portal or CDFW BIOS (USFWS 2018a, CDFW 2018).

9. Violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment?

The replacement park sites are owned by the City and were privately owned prior to City acquisition. The sites are in a heavily developed area, surrounded by urban uses, and have been evaluated in accordance with the California Environmental Quality Act and the National Environmental Policy Act. No other federal, state, local or tribal law or requirement is imposed for the protection of the environment. No significant impacts are anticipated to occur because of the Proposed Action.

10. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)?

Executive Order 12898 directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. The order also directs each agency to develop a strategy for implementing environmental justice. The order is also intended to promote nondiscrimination in federal

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programs that affect human health and the environment, as well as provide minority and low-income communities access to public information and public participation.

The replacement park sites are currently vacant, and provision of neighborhood parks would not conflict with EO 12898's goal of providing environmental justice to minority populations and low-income populations.

The City of Santa Ana has high Hispanic or Latino population and lower income compared to the neighboring cities and the County. According to the American Fact Finder's 2016 estimates, the City of Santa Ana's total population estimate was 333,605, of which Hispanic or Latino race constituted approximately 78 percent (260,007 people), and other race groups such Asian, white, and black or African American along constituted 11 percent (36,425 people), 9.2 percent (30,831 people), and 0.8 percent (2,783 people), respectively (Census 2016c). All other race, including two or more races combined made up approximately 1.1 percent (3,559 people). The City's median household income estimate was \$54,062 and mean household income was \$69,246 (Census 2016). By comparison, the neighboring City of Costa Mesa's total Hispanic or Latino population comprised of 35.8 percent (39,403 people), the white race comprised of 51.8 percent (56,993 people), and other races including, but not limited to Asian, black or African American, comprised the rest of 12.2 percent or 13,564 people, for a combined total population estimate of 109,960 people (Census 2016). The City of Costa Mesa's median household income was \$70,438 and mean household income was \$93,220. For the County of Orange, total population estimate was 3.13 million people, which are comprised of 34.2 percent (1.07 million people) Hispanic or Latino, and other groups such as white, black or African American, Asian constituted 42 percent (1.31 million people), 19.1 percent (596,998 people), and 1.5 percent (49,971 people), respectively (Census 2016). The median household income for the County of Orange was \$78,145 and mean household income was \$106,952 (Census 2016).

Both replacement park sites are currently vacant and development of recreational facilities in a highly urbanized neighborhood would not result in a disproportionately high and adverse effect on low income or minority populations of the City. The Proposed Action would be available to all socio-economic and minority groups.

Provision of replacement parks in residential areas in lieu of recreational facilities in the larger regional park would improve the quality of life in highly urbanized neighborhoods, and would have positive affect on the community, and would not result in adverse impacts to low-income or minority populations.

11. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007)?

Executive Order 13007 requires that any anticipated impacts to Indian trust resources from a project or action by federal agency be explicitly addressed in environmental documents; i.e., EAs, EIS, Management Plans, etc. These documents must clearly state the rationale for the recommended decision and explain how the decision will be consistent with Department of the Interior's trust responsibilities.

According to the Native American Heritage Commission (NAHC), both replacement park sites are not listed in the Sacred Lands File (SLF). Nine tribal groups or individual contacts known to have affiliations to the area of potential effect were contacted by Rincon Cultural Resources Specialist as part of the Cultural Resources

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Report preparation, and follow-up consultation with each of the nine tribal groups or individuals were made (Rincon 2016a, 2016b).

Two tribal group provided meaningful response to the consultation request letters for the two replacement park sites. Anthony Morales from Gabrieleno/Tongva San Gabriel Band of Mission Indians and Joyce Perry from Juaneno Band of Mission Indians Acjachemen Nation indicated that while there are no known tribal resources in the area, they recommended that archaeological spot monitoring during initial ground disturbance activities should be provided. And if archaeological resources are identified during spot monitoring, a Native American monitor should be contacted and monitoring should occur during all ground disturbance. A qualified archaeologist conducted an intensive pedestrian survey for both sites as part of the Cultural Resources Study prepared for each site but did not identify any evidence of tribal cultural resources. However, because there is a potential that previously unidentified tribal cultural resources could be identified during ground disturbance, the following mitigation measures have been incorporated to reduce impacts to less than significant level. Moreover, in the event of unanticipated discovery of human remains, the project contractor is required to follow the California Health and Safety Code Section 7050.5, which states that no further disturbance occurs until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. And if the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendent (MLD). The following mitigations would ensure that any unanticipated discovery of tribal cultural resources or prehistoric human remains does not result in significant impacts.

Mitigation Measure

CUL-1 During initial ground-disturbing activities that extend beyond artificial fill materials, an archaeological spot monitoring shall be provided. Should archaeological resources, including tribal resources, be found, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology must be contacted, and the qualified monitor shall first determine whether the resource is a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines (14 California Code of Regulations [CCR]), or "tribal cultural resources" pursuant to Public Resources Code Section 21074. Once the determination is made pursuant to CEQA Guidelines Section 21083.2, the appropriate actions shall be taken in appropriate sections of the regulations (e.g., 14 CCR §15126.4) to ensure that impacts are reduced to a less than significant level.

And if prehistoric human remains are discovered, the responsible county coroner shall notify the Native American Heritage Commission, which will determine and notify a most likely descendent (MLD). The MLD shall complete the inspection of the area of potential effects (APE) within 48 hours of notification and the City shall comply with the treatment recommendations by the MLD.

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12. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area, or actions that may promote the introduction, growth, or expansion of the range of.

The replacement park sites are currently vacant and all structures have been demolished. Only several trees from the previous residential development exist on the replacement park sites. All other vegetation have been disked and removed. The new park facilities would be landscaped and maintained by the City so that the vegetation on the park facilities do not spread noxious weeds or harbor non-native invasive species. The Proposed Action would not promote the introduction, growth, or expansion of non-native species or other unwanted vegetation.

Cumulative Impacts

Cumulative effects are the result of the incremental effects of the Proposed Action added to the effects of other past, present, and reasonably foreseeable future actions, regardless of whether or not the agency or person undertakes them and regardless of land ownership on which other actions occur.

As discussed throughout Section 2, *Environmental Impact Analysis*, implementation of the Proposed Action would not result in individually significant impacts in the topics such as geological resource, air quality, sound, water quality, biological resources, land use, circulation, recreation resources, aesthetics, historical/cultural/tribal resources, socioeconomics, energy resources, etc. Most of the impacts would be site-specific and minor in character. Construction of two small neighborhood parks that would be accessed by foot by neighbors and without large crowd gathering amenities such as athletic field and bleachers would not create any significant amount of environmental effects that would be cumulatively significant.

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3. Federal Law/Executive Order Compliance

3.1 FEDERAL PROPERTY AND ADMINISTRATIVE SERVICES ACT

US Code Title 40 § 550 et seq. Disposal of real property for certain purposes

Section 550 (e)(4) Deed of Conveyance requires that all of the property to be used and maintained for the purpose for which it was conveyed in perpetuity, and that if the property ceases to be used or maintained for that purpose, all or any portion of the property shall, in its then existing condition, at the option of the Government, revert to the Government; and may contain additional terms, reservations, restrictions, and conditions the Secretary of the Interior determines are necessary to safeguard the interests of the Government.

The 2.6-acre CEC Site is currently being used as educational use, in violation of the US Code Section 550(e)(4). The City of Santa Ana proposes to exchange the 2.6-acre lands under the terms of the USA Deed with three park replacement sites—6th Street Site (0.42-acre), Raitt Street Site (1.09-acre); and McFadden Site/Pacific Electric Park (1.25-acre)—totaling 2.76 acres. If the land exchange is approved, the City would be in conformity with the US Code Section 550. However, if denied, 1) the property may revert to federal ownership, resulting in a net loss of recreational estate in Santa Ana; 2) the public benefit conveyance program for the 2.6-acre could change to school, classroom, or other educational use; or 3) the property could be purchased at fair market value. These options would all result in a net loss of recreational estate in Santa Ana, unless the City vacates the RSCCD use on the CEC Site, and also revert its use to park and recreation. No available funds have been identified to redevelop the CEC Site with recreational use while also losing the funding from leasing the CEC Site to RSCCD.

3.2 NATIONAL HISTORIC PRESERVATION ACT

National Historic Preservation Act (NHPA), Section 106 (US Code Title 54)

Section 106 requires Federal agencies to take into account the effects of their undertakings on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) with a reasonable opportunity to comment. In addition, Federal agencies are required to consult on the Section 106 process with State Historic Preservation Offices (SHPO), Tribal Historic Preservation Offices (THPO), Indian Tribes (to include Alaska Natives) [Tribes], and Native Hawaiian Organizations (NHO).

6th Street Site

6th Street & Lacey Street Park Project Cultural Resources Study was prepared in January 2016, prior to the demolition of three single-family residences. The report determined that the residences were ineligible for the inclusion in the federal, state, or local historical resources listing and that no further evaluation was necessary.

3. Federal Law/Executive Order Compliance

The 6th Street Site is currently vacant and does not contain any above-grade structures. Any potential subsurface impacts to archaeological resources and tribal cultural resources have been determined as less than significant with implementation of mitigation measure CUL-1 and TRC-1. No further consideration pertaining to Section 106 is required.

Raitt Street Site

Raitt & Myrtle Street Park Project Cultural Resources Study was prepared in January 2016. The site was vacant at the time of report preparation. A field survey, archival research, cultural resources records search, and Native American consultation found one previously unrecorded archaeological site within the project area of potential effects (APE). However, this resource was determined to be ineligible for listing on the NRHP and required no further management consideration under NRHP. The Raitt Street Site is currently vacant and does not contain any above-grade structures. Any potential subsurface impacts to archaeological resources and tribal cultural resources have been determined as less than significant with implementation of mitigation measure CUL-1 and TRC-1. No further consideration pertaining to Section 106 is required.

3.3 ENDANGERED SPECIES ACT

Endangered Species Act (ESA) of 1973, Section 7 (50 CFR Part 402)

6th Street Site

The 6th Street Site is vacant with four trees and no native vegetation suitable to provide habitat for sensitive or special status species. There is no riparian habitat on or near the site. The site has been previously disturbed and surrounded by various urban development. No endangered, rare, threatened, or special status plant or wildlife species designated by the US Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) are known to occur on this site. No known regional wildlife corridors or any other sensitive biological areas as indicated by the USFWS Critical Habitat portal or CDFW BIOS (USFWS 2018a, CDFW 2018).

Raitt Street Site

The Raitt Street Site is vacant with seven trees and no native vegetation suitable to provide habitat for sensitive or special status species. There is no riparian habitat on or near the site. The site has been previously disturbed and surrounded by various urban development. No endangered, rare, threatened, or special status plant or wildlife species designated by the US Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) are known to occur on this site. No known regional wildlife corridors or any other sensitive biological areas as indicated by the USFWS Critical Habitat portal or CDFW BIOS (USFWS 2018a, CDFW 2018).

3.4 FLOOD PLAIN MANAGEMENT

Executive Order 11988

Executive Order 11988 requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support

3. Federal Law/Executive Order Compliance

of floodplain development wherever there is a practicable alternative. EO 11988 requires appropriate actions provided that a proposed action is in the base floodplain (that area which has a one percent or greater chance of flooding in any given year).

6th Street Site

The 6th Street Site is within the FEMA Flood Insurance Rate Map's (FIRM) flood zone X, area of minimal flood hazard. Zone X represents area subject to inundation by the 0.2 percent annual chance flood hazard, areas of 1 percent annual change flood with average depth less than one foot or with drainage areas of less than one square mile (Map ID# 06059C0256J) (FEMA 2009a). The 6th Street Site is not in the base floodplain, which has a one percent or greater change of flooding in any given year, and no further evaluation is necessary.

Raitt Street Site

The Raitt Street Site is within the FEMA FIRM flood zone X, zone D overlay. Zone X represents area subject to inundation by the 0.2 percent annual chance flood hazard, area of 1 percent annual change flood with average depth less than one foot or with drainage areas of less than one square mile, and zone D represents area with flood risk due to levee (Map ID# 06059C0257J) (FEMA 2009b). The Raitt Street Site is not in the base floodplain, which has a one percent or greater change of flooding in any given year, and no further evaluation is necessary.

3.5 WETLAND PROTECTION

Executive Order 11990

It requires a project to avoid to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative.

6th Street Site

The 6th Street Site is in an urbanized area and does not contain any wetland as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to marsh, vernal pool, coastal, etc.) and no such wetlands exist in the vicinity (USFWS 2017). No impacts to wetland would occur, and no further evaluation is necessary.

Raitt Street Site

The Raitt Street Site is in an urbanized area and does not contain any wetland as defined by Section 404 of the CWA (including, but not limited to marsh, vernal pool, coastal, etc.) and no such wetlands exist in the vicinity (USFWS 2017). No impacts to wetland would occur, and no further evaluation is necessary.

3. Federal Law/Executive Order Compliance

3.6 ENVIRONMENTAL COMPLIANCE MEMORANDUM 95-3 – ENVIRONMENTAL JUSTICE

Executive Order 12898

It directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. The order also directs each agency to develop a strategy for implementing environmental justice. The order is also intended to promote nondiscrimination in federal programs that affect human health and the environment, as well as provide minority and low-income communities access to public information and public participation.

6th Street Site and Raitt Street Site

The 6th Street Site and the Raitt Street Site are currently vacant and provision of neighborhood parks would not conflict with EO 12898's goal of providing environmental justice in minority populations and low-income populations. The City of Santa Ana is built out and lacks parks and open space within the City.

The replacement park sites are currently vacant, and provision of neighborhood parks would not conflict with EO 12898's goal of providing environmental justice to minority populations and low-income populations.

The City of Santa Ana has high Hispanic or Latino population and lower income compared to the neighboring cities and the County. According to the American Fact Finder's 2016 estimates, the City of Santa Ana's total population estimate was 333,605, of which Hispanic or Latino race constituted approximately 78 percent (260,007 people), and other race groups such Asian, white, and black or African American along constituted 11 percent (36,425 people), 9.2 percent (30,831 people), and 0.8 percent (2,783 people), respectively (Census 2016c). All other race, including two or more races combined made up approximately 1.1 percent (3,559 people). The City's median household income estimate was \$54,062 and mean household income was \$69,246 (Census 2016). By comparison, the neighboring City of Costa Mesa's total Hispanic or Latino population comprised of 35.8 percent (39,403 people), the white race comprised of 51.8 percent (56,993 people), and other races including, but not limited to Asian, black or African American, comprised the rest of 12.2 percent or 13,564 people, for a combined total population estimate of 109,960 people (Census 2016). The City of Costa Mesa's median household income was \$70,438 and mean household income was \$93,220. For the County of Orange, total population estimate was 3.13 million people, which are comprised of 34.2 percent (1.07 million people) Hispanic or Latino, and other groups such as white, black or African American, Asian constituted 42 percent (1.31 million people), 19.1 percent (596,998 people), and 1.5 percent (49,971 people), respectively (Census 2016). The median household income for the County of Orange was \$78,145 and mean household income was \$106,952 (Census 2016).

Both replacement park sites are currently vacant and development of recreational facilities in a highly urbanized neighborhood would not result in a disproportionately high and adverse effect on low income or minority populations of the City. The Proposed Action would be available to all socio-economic and minority groups. Provision of replacement parks in residential areas in lieu of recreational facilities in the larger regional park would improve the quality of life in highly urbanized neighborhoods, and would have positive affect on the

3. Federal Law/Executive Order Compliance

community, and would not result in adverse impacts to low-income or minority populations relating to human health and environment.

3.7 ENVIRONMENTAL COMPLIANCE MEMORANDUM 97-2 – INDIAN TRUST RESOURCES

Executive Order 13007

It requires that any anticipated impacts to Indian trust resources from a project or action by federal agency be explicitly addressed in environmental documents; i.e., EAs, EIS, Management Plans, etc. These documents must clearly state the rationale for the recommended decision and explain how the decision will be consistent with Department of the Interior's trust responsibilities.

6th Street Site

A Cultural Resources Study was prepared for the 6th Street Site in January 2016 by Rincon Consultants, Inc. (Rincon) (Appendix C to this EA). The site was previously developed with three single-family residential units at the time of the cultural report preparation. Based on records search, intensive pedestrian survey of the area of potential effects (APE), and consultation with applicable tribal groups and local historical society, the Study determined that the residences were ineligible for the inclusion in the federal, state, or local historical resources listing and that no further evaluation was deemed necessary. The Study indicated that according to the Native American Heritage Commission (NAHC), the 6th Street Site is not listed in the Sacred Lands File (SLF). Additionally, nine tribal groups or individual contacts known to have affiliations to the project APE and surrounding area were contacted by Rincon Cultural Resources Specialist, and follow-up consultation with each of the nine tribal groups or individuals were conducted (Rincon 2016a, Appendix C).

National Historic Preservation Act (NHPA), Section 106 (US Code Title 54) requires federal agencies to take into account the effects of their undertakings on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) with a reasonable opportunity to comment. In addition, Federal agencies are required to consult on the Section 106 process with State Historic Preservation Offices (SHPO), Tribal Historic Preservation Offices (THPO), Indian Tribes (to include Alaska Natives) [Tribes], and Native Hawaiian Organizations (NHO). 6th Street Site is currently vacant without any above-grade structures. Historic properties are any prehistoric or historic districts, sites, buildings, structures, or objects that are eligible for or already listed in the National Register of Historic Places. Also included are any artifacts, records, and remains (surface or subsurface) that are related to and located within historic properties and any properties of traditional religious and cultural importance to Tribes or NHOs. As documented in the Study, appropriate consultation efforts were made with the applicable agencies and tribal groups, and the Study determined that no historical, archaeological, or tribal resources were identified as within or adjacent to the subject property. Although no resources have been identified, two tribal group provided meaningful response to the consultation request letters. Anthony Morales from Gabrieleno/Tongva San Gabriel Band of Mission Indians and Joyce Perry from Juaneno Band of Mission Indians Acjachemen Nation recommended that archaeological spot monitoring during initial ground disturbance activities should be provided. 6th Street Site has been previously developed and soils disturbed. Therefore, the potential for discovering tribal cultural resources in the artificial fill materials would

3. Federal Law/Executive Order Compliance

be negligible. However, where the grading extends beyond the artificial fill materials, a mitigation measure is incorporated to reduce potential impacts to a less than significant.

Raitt Street Site

A Cultural Resources Study was prepared in January 2016 for the Raitt Street Site (Appendix C to this EA). The site was vacant at the time of report preparation. A field survey, archival research, cultural resources records search, and Native American consultation were conducted. Based on the results of the records search, Native American scoping, and local consultation, no previously recorded archaeological resources were identified within the subject site. The Study indicated that according to the NAHC, the Raitt Street Site is not listed in the SLF. Although the intensive pedestrian survey found items related to previous development such as pavers, saw cut bone, saw blade, window weight, and *tivela* (clam), they were subsequently determined as historical refuse scatter, likely from previous development in 1951. The historical refuse scatters were determined to be ineligible for listing on the NRHP, and required no further management consideration under Section 106 of NHPA. In addition, similarly with the 6th Street Site, appropriate consultation efforts were made with the applicable agencies and tribal groups. Although no resources have been identified, two tribal group provided meaningful response to the consultation request letters. Anthony Morales from Gabrieleno/Tongva San Gabriel Band of Mission Indians and Joyce Perry from Juaneno Band of Mission Indians Acjachemen Nation recommended that archaeological spot monitoring during initial ground disturbance activities should be provided. Therefore, as with the 6th Street Site, where the grading extends beyond the artificial fill materials, a mitigation measure is incorporated to account for unanticipated discovery of subsurface cultural resources during soil excavation. Impacts would not be significant.

Mitigation Measures

CUL-1 During initial ground-disturbing activities that extend beyond artificial fill materials, an archaeological spot monitoring shall be provided. Should archaeological resources, including tribal resources, be found, work within 25 feet of the find must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology must be contacted, and the qualified monitor shall first determine whether the resource is a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines (14 California Code of Regulations [CCR]), or "tribal cultural resources" pursuant to Public Resources Code Section 21074. Once the determination is made pursuant to CEQA Guidelines Section 21083.2, the appropriate actions shall be taken in appropriate sections of the regulations (e.g., 14 CCR §15126.4) to ensure that impacts are reduced to a less than significant level.

And if prehistoric human remains are discovered, the responsible county coroner shall notify the Native American Heritage Commission, which will determine and notify a most likely descendent (MLD). The MLD shall complete the inspection of the area of potential effects within 48 hours of notification and the City of Santa Ana shall comply with the treatment recommendations by the MLD.

3. Federal Law/Executive Order Compliance

TCR-1 If the professional archaeologist implementing Mitigation Measure CUL-1 believes that a cultural resource encountered onsite is of “tribal cultural resources” pursuant to Public Resources Code Section 21074, the archaeologist shall notify representatives of Native American tribes with traditional territories in the project region. If requested by the Native American tribe(s), the developer or archaeologist on-call shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, return of artifacts to tribe). If the resources are Native American in origin, a tribal monitor from the consulting tribe shall be present during the remaining site-grading activities.

3. Federal Law/Executive Order Compliance

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4. Summary of Alternatives Considered

4.1 ALTERNATIVES CONSIDERED BUT DISMISSED

This section is required for NEPA compliance related to the propose land exchange.

- **Abrogation.** This alternative considers purchase of property at fair market value. This alternative was rejected because it would result in a net loss of the public recreation estate in Santa Ana. The land exchange proposal, on the other hand, uses community college funds to purchase replacement park sites, thus maintaining the recreation estate acreage while serving areas of the City that are currently lacking in park and open space areas.
- **Public benefit conveyance program change.** This alternative considers changing the terms of the public benefit conveyance program for the 2.6 acre area to allow education so that RSCCD's use of the 2.6-acre as adult education facility can remain. This alternative was rejected because it would also result in a net loss of the public recreation estate in Santa Ana. Santa Ana is one of the 100 most populous cities in the U.S. TPL's 2017 City Park Facts indicates that 4.3 percent of Santa Ana's land acreage is parks, the second lowest percentage among high density cities; the median was 12.1 percent. While it would serve the educational needs of the community, the City currently has insufficient recreational opportunities compared to other cities.
- **Revert to Public Park Use.** This alternative would require RSCCD to vacate CEC site so that it can be returned to the public park use required by the Deed - described under the "No Action" alternative.

4.2 NO ACTION ALTERNATIVE

The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the Proposed Action with the impacts of not approving the Proposed Action.

Discussion of this No Action alternatives does not include mitigation measures to minimize or avoid environmental impacts. The environmental impacts of the No Action alternative are compared to the Proposed Action's environmental impacts. Environmental impacts are evaluated as to whether the alternative's environmental impacts would be similar to the Proposed Action, greater, or less than the Proposed Action.

Under this alternative, the 2.6-acre CEC Site would be returned to the mandated recreation use, and the two replacement park sites (6th Street Site and Raitt Street Site) would remain vacant and no replacement parks would be developed. Since Pacific Electric Park is already developed, it would remain operational. Under the approved POU the main elements of the Centennial Park master plan concept included the following:

4. Summary of Alternatives Considered

- Amphitheater
- Centennial Plaza
- Restaurant
- Community Service Building
- Swimming Pool
- Multi-Purpose Recreation Building
- Bicycle Center
- Tennis Center
- Organized Play Area
- Picnic and Day Camp Areas
- Adventure Playground with Splash Pool
- Arboretum
- Lake
- Regional Bikeway
- Off-street Parking

According to the 2018 RVA, uses such as a multi-purpose recreation building, basketball and/or tennis courts, motocross course, boat rental facilities, and small soccer field could be developed on the CEC Site per the Master Plan for Centennial Park (see Figure 1) under this alternative.

Aesthetics

Under this alternative, the CEC Site would be redeveloped as a multi-purpose recreation building, basketball and/or tennis courts, motocross course, boat rental facilities, and small soccer field, or its use would be re-evaluated to meet the public needs; and the two replacement park sites would remain vacant. Since the CEC Site is in the existing regional park, a return to recreational uses would be aesthetically compatible with its surroundings. The replacement park sites would remain as vacant, except for the Pacific Electric Park (McFadden Site), where the park is already developed and operating. It is reasonable to assume that the two replacement park sites, if left vacant, could collect trash and attract vandalism even with the chain-link fencing, therefore, potentially degrading visual quality of the area.

This alternative could result in potential increase in nighttime light and glare impacts around CEC Site, if nighttime field or court lighting were to be provided for nighttime use. However, the nearest residential uses are over 400 feet to the north across Edinger Avenue, therefore, light and impacts around CEC Site would not be significant. Minimal light and glare impacts would occur around the replacement park sites due to security lighting only. This alternative is anticipated to result in similar aesthetic impacts compared to the Proposed Action.

Air Quality and Greenhouse Gas

Under the No Action Alternative, two replacement park sites (6th Street and Raitt Street Sites) would remain vacant and unpaved. However, CEC Site would be returned to recreational use, requiring demolition of the existing CEC building to develop one of the planned recreational uses. Since demolition and site preparation

4. Summary of Alternatives Considered

activities would require more construction equipment and longer construction period compared to development of vacant replacement park sites, more construction air quality impact is anticipated.

Under this alternative, redistribution of trips would occur, as the CEC students would be required to attend classes in other area schools, potentially driving longer distances, and additional recreational facility visitors would be added to Centennial Park. Compared to the Proposed Action, where replacement parks would be developed as walk-up parks with no long-term operational impact, this alternative would result in similar or greater long-term air quality impacts since students and park visitors could potentially drive greater distances. With greater driving distance, greater greenhouse gas emission is anticipated. No Action alternative would result in greater environmental impacts compared to the Proposed Action regarding air quality.

Biological Resources

The 6th Street Site and the Raitt Street Site are currently vacant except for some non-native trees, as the sites were previously developed with residential uses. There are no sensitive species or habitats within the replacement park sites. Under the No Action Alternative, the trees would not be removed and/or replaced. CEC Site also contains ornamental trees that need to be removed and/or replaced. Therefore, this alternative would result in similar environmental impacts compared to the Proposed Action.

Cultural Resources

Similar to the Proposed Action site, this alternative site is not expected to contain any cultural resources. The CEC Site and the replacement park sites have been previously developed and no significant cultural resources impacts are anticipated during construction. Therefore, this alternative is anticipated to result in similar environmental impacts as the Proposed Action.

Geology, Topography, Soils

Two vacant replacement park sites are relatively flat, and there are no above-grade structures. No existing geological features that present a potential hazard has been identified.

Under the No Action alternative, no grading, excavation, or other construction activities which could affect site stability would occur on the two vacant replacement park sites. However, it would require demolition of the CEC building and redevelopment of the CEC Site to one of the master planned recreational uses. The level of development would depend on the recreational use selection and different development would be required to prepare a geotechnical report and follow appropriate standard and recommendations contained therein. The Proposed Action and the No Action Alternative would not result in significant impacts related to geology and soils, provided that requirements of the California Building Code CBC (Title 24, Part 2, California Code of Regulations) are implemented. This alternative is neither environmentally superior nor inferior to the Proposed Action.

Hazards and Hazardous Materials

Under this alternative, the CEC Site would be redeveloped with recreational facilities. The potential recreational uses at the CEC Site would not require routine transport, use, or storage of hazardous materials, except

4. Summary of Alternatives Considered

temporarily during demolition and construction. The replacement park sites would remain vacant and no use of hazardous materials would be involved. The Proposed Action would also result in temporary use of hazardous materials during construction but would not require routine use during operation. Therefore, the No Action alternative would have similar environmental impacts as the Proposed Action.

Hydrology and Water Quality

Under this alternative, both replacement park sites would not be developed with recreational facilities, resulting in no impervious surfaces. And the CEC Site would be redeveloped as a recreational use, susceptible to erosion and water quality impacts during construction. Therefore, the potential for water quality issues with respect to soil erosion and runoff during storm events would be greater than the Proposed Action, as there would be larger area of bare soils under the No Project alternative compared to the Proposed Action. The potential for discharging non-source point and point source pollution into surface waters in the project area would be slightly greater under the No Project alternative. The Proposed Action would not substantially alter the existing drainage volume and pattern, even with some impervious pavement and some hardscape areas for the park development. It is anticipated that the replacement park sites would be designed to retain runoff onsite so that water would infiltrate into the soil, so that the runoff volumes are comparable to the existing conditions. Therefore, No Action alternative is anticipated to result in greater environmental impacts compared to the Proposed Action.

Land Use

Under this alternative, existing allowable land uses on the project site, which consist of residential uses would remain unchanged. Both the existing and proposed land uses are compatible with surrounding land uses. Therefore, the No Action Alternative is anticipated to result in similar environmental impacts compared to the Proposed Action regarding land use and planning.

Noise

This alternative site would produce greater noise impacts to that of the Proposed Action due to the demolition of CEC building. No demolition is necessary under the Proposed Action, therefore, only construction noise would be related to site preparation and building construction. Longer duration of construction is also anticipated due to demolition under the No Project alternative.

Operationally, the No Project alternative would also generate greater mobile source noise, as the displaced students having to travel to other areas and more park users visit the Centennial Park. Therefore, this alternative is anticipated to generate greater environmental impact compared to the Proposed Action.

Public Services

Under this alternative, significant impacts to public services would not be generated, as these services are already being provided for other Centennial Park visitors. Similarly, roughly the same amount of public services and utilities would be required as the Proposed Action, since the replacement parks would serve the same local community members who are already being served by these services. Therefore, this alternative is environmentally similar to the Proposed Action.

4. Summary of Alternatives Considered

Recreation

Because the alternate site is part of a regional park that already provides a variety of recreational opportunities for the community, the need for additional recreational facilities at this site is not as great as the need for new facilities at the replacement park sites. The replacement park sites are unimproved and provide no community recreational services. The Proposed Action is likely to create greater recreational value to the community compared to the No Action alternative.

Transportation

Under this alternative, the total traffic trips and circulation patterns would be changed as the CEC students would have to travel to other areas of the city or other cities to take classes and additional park visitors visit the CEC Site to use the newly developed facility. The replacement park sites would remain vacant, and no change in vehicle trips is anticipated. Development of the Proposed Action would not cause a significant increase in traffic in the project area since there will be no parking provided at the 6th Street Site and the Raitt Street Site, and the parks would be designed and operated as passive neighborhood walk-up parks. Therefore, the No Action alternative is likely to create greater traffic impacts compared to the Proposed Action.

Conclusion

As discussed above, the No Action alternative would result in greater impacts compared to the Proposed Action in the areas of air quality and greenhouse gas emissions, hydrology and water quality, noise, recreation, and transportation; and similar impacts in the areas of aesthetics, biological resources, cultural resources, geology and soils, hazardous materials, land use, and public services.

The No Action Alternative would allow the deed restriction from the Department of the Interior to be met and return the existing educational uses to recreational uses. However, it would not meet the city's goals of allowing the CEC to remain at its present campus and providing park spaces to portions of the community whose recreational needs have not been met. The replacement parks are in park-poor neighborhoods, where the City would benefit much more than from providing additional facilities at Centennial Park where various park facilities already exist. The No Action alternative also does not meet the current trend for parks within walking distance of more residents.

4. Summary of Alternatives Considered

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