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ATTACHMENTS (Separately on Compact Disc)

Attachment A - Ramp Intersection Cycle Length Surveys
Attachment B – Ramp Intersection LOS Worksheets
Attachment C – HCM Merge, Diverge, and Weaving Analysis Worksheets
Attachment D – Crommelin Methodology Graph
Attachment E – Off-Ramp Queuing
Attachment F – Freeway Mainline Analysis Worksheets
1. INTRODUCTION

The Final Environmental Impact Report (FEIR) No. 345 for the Ball Road Basin General Plan Amendment and Zone Change has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000, et seq.) and the State CEQA Guidelines (Guidelines) (14 Cal. Code Regs §§ 15000, et seq.).

CEQA Guidelines § 15132 specify that the FEIR shall consist of:
(a) The draft EIR or a revision of the draft.
(b) Comments and recommendations received on the draft EIR either verbatim or in summary.
(c) A list of persons, organizations, and public agencies commenting on the draft EIR.
(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
(e) Any other information added by the Lead Agency.

CEQA Guidelines § 15088.5 details the circumstances by which an EIR would be required to be recirculated prior to certification. The City of Anaheim, as Lead Agency, affirms that none of the criteria for recirculation have been met and the preparation of this FEIR is appropriate.

This document contains responses to comments received on the DEIR No. 345 for the Ball Road Basin General Plan Amendment and Zone Change during the public review period from June 7, 2018 through July 23, 2018. This document represents the independent judgement of the Lead Agency, the City of Anaheim, and together with the DEIR, comprise the FEIR in accordance with CEQA Guidelines, § 15132.

2. RESPONSES TO COMMENTS

CEQA Guidelines § 15088 requires the Lead Agency, the City of Anaheim, to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR. This section provides all comments received on the DEIR and the responses to each comment. A list of agencies, organizations, and persons that submitted comments on the DEIR during the public review period is presented in Table 1, Organizations, Persons, and Public Agencies that Commented on the DEIR.

2.1 CEQA Requirements Regarding Comments and Responses

CEQA Guidelines, § 15204(a) CEQA Guidelines § 15204(a) outlines parameters for submitting comments, and notes that the focus of review and comment of DEIRs should be:

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

Table 1 - Organizations, Persons, and Public Agencies that Commented on the DEIR

<table>
<thead>
<tr>
<th>Comment Letter</th>
<th>Commenting Organization, Person, or Public Agency</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>South Coast Air Quality Management District</td>
<td>June 15, 2018</td>
</tr>
<tr>
<td>B</td>
<td>Native American Heritage Commission</td>
<td>June 19, 2018</td>
</tr>
<tr>
<td>C</td>
<td>Department of Toxic Substances Control</td>
<td>June 25, 2018</td>
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<tr>
<td>D</td>
<td>Department of Conservation, Division of Oil, Gas, and Geothermal Resources</td>
<td>July 18, 2018</td>
</tr>
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<td>E</td>
<td>Department of Transportation, District 12 (Caltrans)</td>
<td>July 18, 2018</td>
</tr>
<tr>
<td>F</td>
<td>Office of Planning and Research</td>
<td>July 19, 2018</td>
</tr>
<tr>
<td>G</td>
<td>City of Orange</td>
<td>July 23, 2018</td>
</tr>
<tr>
<td>H</td>
<td>County of Orange, OC Public Works</td>
<td>July 23, 2018</td>
</tr>
<tr>
<td>I</td>
<td>California Cultural Resource Preservation Alliance, Inc.</td>
<td>July 30, 2018</td>
</tr>
</tbody>
</table>

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

Pursuant to CEQA Guidelines § 15088(b), copies of the written responses shall be provided to commenting public agencies at least ten (10) days prior to certifying the FEIR. The responses shall be provided along with an electronic copy of this FEIR, as permitted by CEQA, and shall conform to the legal standards established for response to comments on DEIRs.

2.2 Responses to Comments on the Draft Environmental Impact Report

CEQA Guidelines § 15088 requires the Lead Agency (City of Anaheim) to evaluate comments on environmental issues received from public agencies and interested parties who review the DEIR and to provide written response to any substantive comments received. Nine (9) comment letters were received in response to the DEIR’s public review period. A copy of each letter with bracketed comment numbers on the right margin is followed by the response for each comment as indexed in the letter. Comment letters and specific comments are given letters and numbers for reference purposes.
2.2.1 Comment Letter A – South Coast Air Quality Management District
Draft Environmental Impact Report (Draft EIR) for the Proposed
Ball Road Basin General Plan Amendment & Zone Change (SCH No: 2013021026)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff’s Summary of Project Description
The Proposed Project consists of updates to City of Anaheim General Plan land use designation for Ball Road Basin from open space to general commercial, and zoning from transitional and industrial to general commercial for 19.5 acres (Proposed Project). The Proposed Project would also add a bike path and trail study area along edges of the Basin. The Proposed Project is located on the southeast corner of Ball Road and Phoenix Club Drive. Construction of the Proposed Project is estimated to begin in 2020 over an approximate five-year period.

SCAQMD Staff’s Summary of Air Quality Analysis
In the Air Quality section, the Lead Agency quantified the Proposed Project’s construction and operational emissions and compared those emissions to SCAQMD’s regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project’s construction and operational air quality impacts would be less than significant after incorporating Mitigation Measures (MM) AIR-1 through MM AIR-3.

Air Quality Analysis – Project Design Consideration: Tier 4 Construction Equipment or Better
CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. While MM AIR-1 is capable of reducing the Proposed Project’s construction NOx emissions to less than significant, SCAQMD staff recommends that the Lead Agency revise MM AIR-1 as follows to require that all off-road diesel-powered construction equipment of 50 horsepower (hp) or greater meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of

---

1 Draft EIR, Chapter 0.0, Page 7.
2 Draft EIR, Chapter 3.2.5, Page 101-2.
achieving at least 85 percent reduction in in particulate matter emissions. A list of CARB verified DPFs are available on the CARB website.

**MM AIR-1:** Prior to issuance of the grading permit, the Property Owner/Developer shall require the construction contractor to use large off-road diesel equipment with a horsepower (hp) rating of at least 50 hp or higher that meets the U.S. EPA-Certified emission standard for Tier 3 or later off-road equipment or higher. Any model year 2006 or later off-road diesel equipment meets the Tier 3 standard. The construction contractor shall maintain on-site a list of construction equipment by type and model year. MM AIR-1 shall not apply to any equipment that is utilized on the Project site that is licensed to operate on public roadways, such as water trucks.

To ensure that Tier 4 construction equipment or better will be used during the Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit’s certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors, and conduct regular inspections of the list of construction equipment by type and model year to the maximum extent feasible to ensure compliance.

**Other Comments**

Upon review of Table 3.2-6, *Construction-Related Criteria Pollutant Emissions*, in the Draft EIR, SCAQMD staff found two inconsistencies (see Table A). First, the total NOx emissions from the grading phase would exceed SCAQMD air quality CEQA significance threshold prior to implementation of MM AIR-1. Therefore, it should be a “Yes” to the exceedance question. Additionally, the Lead Agency stated in the Methodology Section that CalEEMod Version 2016.3.1 was used to quantify the Proposed Project’s construction-related criteria pollutant emissions; however, CalEEMod Version 2011.1.1 was listed as the source. Therefore, SCAQMD staff recommends that the Lead Agency correct the inconsistencies in Table 3.2-6 in the Final EIR.

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## Table A: Copy of Table 3.2-6 Construction-Related Criteria Pollutant Emissions

<table>
<thead>
<tr>
<th>Activity</th>
<th>VOC</th>
<th>NO₂</th>
<th>CO</th>
<th>SO₂</th>
<th>PM₁₀</th>
<th>PM₂.₅</th>
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<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Grading</td>
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</tr>
<tr>
<td>On-Site</td>
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<td>45.36</td>
<td>0.09</td>
<td>10.76</td>
<td>6.51</td>
</tr>
<tr>
<td>Off-Site</td>
<td>0.85</td>
<td>26.19</td>
<td>7.75</td>
<td>0.07</td>
<td>3.57</td>
<td>0.99</td>
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<tr>
<td>Total</td>
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<td>53.09</td>
<td>0.17</td>
<td>14.33</td>
<td>7.30</td>
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<td>On-Site</td>
<td>1.40</td>
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<td>0.67</td>
<td>0.62</td>
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<td>Off-Site</td>
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<td>On-Site</td>
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<td>Off-Site</td>
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<td>Total</td>
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<td>26.43</td>
<td>29.64</td>
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<td>Total</td>
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<td>Architectural Coatings</td>
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<tr>
<td>On-Site</td>
<td>67.17</td>
<td>1.30</td>
<td>1.81</td>
<td>0.00</td>
<td>0.07</td>
<td>0.07</td>
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<tr>
<td>Off-Site</td>
<td>0.19</td>
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<td>1.55</td>
<td>0.00</td>
<td>0.57</td>
<td>0.15</td>
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<tr>
<td>Total</td>
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<td>1.40</td>
<td>3.16</td>
<td>0.00</td>
<td>0.64</td>
<td>0.23</td>
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</table>

### SCAQMD Thresholds
- VOC: 75 pounds/day
- NO₂: 100 pounds/day
- CO: 550 pounds/day
- SO₂: 150 pounds/day
- PM₁₀: 150 pounds/day
- PM₂.₅: 55 pounds/day

### Exceeds Threshold?
- No

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**Conclusion**

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusionary statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusionary statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.
SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS/AM
ORC180608-03
Control Number
Responses to Comment Letter A – South Coast Air Quality Management District

A-1: Summary of Project Description comment acknowledged. No further response is required.

A-2: SCAQMD Staff’s Summary of Air Quality Analysis comment acknowledged. No further response is required.

A-3: Recommendation to revise MM AIR-1 to require that all off-road diesel-powered construction equipment of 50 horsepower (hp) or greater meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards during Project construction. The comment is acknowledged, MM AIR-1 and all textual references to it in the DEIR are revised as follows, with strikeout showing deletions and underline showing additions:

**MM AIR-1:** Prior to issuance of the grading permit, the Property Owner/Developer shall require in the construction bid documents that the construction contractor use large off-road diesel equipment with a horsepower (hp) rating of 160-50 hp or higher that meets the U.S. EPA-Certified emission standard for Tier 3 or 4 off-road equipment or higher. Any model year 2006 or later off-road diesel equipment meets the tier 3 standard. The construction contractor shall maintain on-site a list of construction equipment by type and model year that will be made available for inspection by the City during construction. MM AIR-1 shall not apply to any equipment that is utilized on the Project site that is licensed to operate on public roadways, such as water trucks.

A-4: Recommendation to include requirement for Tier 4 construction equipment or better to be used during Project construction in applicable bid documents as well as reporting and inspection during construction is acknowledged. MM AIR-1 and all textual references to it in the DEIR are revised as noted in Response to Comment A-3 above.
A-5: Inconsistencies in Table 3.2-6, *Construction-Related Criteria Pollutant Emissions*, acknowledged and corrected as follows, with strikeout showing deletions and underline showing additions:

| Activity                | Pollutant Emissions (pounds/day) |  
|-------------------------|----------------------------------|------------------
|                         | VOC    | NO_2 | CO    | SO_2  | PM_10 | PM_2.5 |
| Grading                 |        |      |       |       |       |       |
| On-Site\(^1\)           | 7.00   | 79.61| 45.36 | 0.09  | 10.76 | 6.31   |
| Off-Site\(^2\)          | 0.85   | 26.19| 7.73  | 0.07  | 3.57  | 0.99   |
| Total                   | 7.85   | 105.80| 53.09 | 0.17  | 14.33 | 7.30   |
| Trenching               |        |      |       |       |       |       |
| On-Site                 | 1.40   | 13.93| 12.31 | 0.02  | 0.67  | 0.62   |
| Off-Site                | 0.05   | 0.55 | 0.43  | 0.00  | 0.15  | 0.04   |
| Total                   | 1.45   | 14.48| 12.74 | 0.02  | 0.83  | 0.66   |
| Building Construction   |        |      |       |       |       |       |
| On-Site                 | 1.71   | 15.62| 16.36 | 0.03  | 0.81  | 0.76   |
| Off-Site                | 1.29   | 10.82| 10.08 | 0.05  | 3.63  | 1.01   |
| Total                   | 3.00   | 26.43| 26.44 | 0.08  | 4.44  | 1.77   |
| Paving                  |        |      |       |       |       |       |
| On-Site                 | 1.88   | 10.19| 14.58 | 0.02  | 0.51  | 0.47   |
| Off-Site                | 0.06   | 0.03 | 0.40  | 0.00  | 0.17  | 0.05   |
| Total                   | 1.94   | 10.22| 14.98 | 0.02  | 0.68  | 0.51   |
| Architectural Coatings  |        |      |       |       |       |       |
| On-Site                 | 67.17  | 1.30 | 1.81  | 0.00  | 0.07  | 0.07   |
| Off-Site                | 0.19   | 0.10 | 1.35  | 0.00  | 0.57  | 0.15   |
| Total                   | 67.35  | 1.40 | 3.16  | 0.00  | 0.64  | 0.23   |

| SCQAMD Thresholds       | 75     | 100  | 550   | 150   | 150   | 55     |
| Exceeds Threshold?      | No     | Yes  | No    | No    | No    | No     |

\(^1\) On-site emissions from equipment not operated on public roads.
\(^2\) Off-site emissions from vehicles operating on public roads.

Source: CalEEMod Version 2011.1.1 \- 2016.3.1.

A-6: Request for responses to comments be provided to SCAQMD staff prior to the certification of the Final EIR per California Public Resources Code § 21092.5(a) and CEQA Guidelines § 15088(b) is acknowledged and such response to comments will be provided to SCAQMD staff accordingly.
2.2.2 Comment Letter B – Native American Heritage Commission
Good afternoon Ms. Kim,

I have just finished reviewing the Draft EIR on the project referenced above and have one slight change in the text under the mitigation for finds of human remains. The MLD has 48 hours from the time they are given access to the site to make their recommendations, not from the time they are notified. That time does not start running until they have a chance to inspect the remains. Please make that small correction in the text of the cultural resources section.

The rest of the document was substantially in compliance so I did not want to send a formal comments letter for such a small change.

Thank you very much,

Gayle Totton, M.A., Ph.D.
Associate Governmental Program Analyst
Native American Heritage Commission
(916) 373-3714
Response to Comment Letter B – Native American Heritage Commission

B-1: Request to revise MM CUL-3 to reflect that the Most Likely Descendant shall make their recommendations to the disposition of human remains within 48 hours of the time they are given access to the site, not from the time they are notified. Comment is acknowledged and MM CUL-3 is revised as follows, with strikeout showing deletions and underline showing additions:

**MM CUL-3:** In the event human remains are discovered, the Construction Contractor shall notify the County Coroner of the find immediately and no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98 (State of California 2006). If human remains are found during grading, all work in the immediate area (a radius of at least 100 feet) shall stop, and all parties shall follow all applicable state laws regarding human remains. If the remains are Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Section 5097.98, shall immediately notify those persons it believes to be the Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification being allowed access to the site and shall recommend preservation in place, reburial, or the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.
2.2.3 Comment Letter C – Department of Toxic Substances Control
June 25, 2018

Ms. Susan Kim
City Hall
City of Anaheim
Planning Department
200 S. Anaheim Blvd, MS 162
Anaheim, California 92805
sklm@anaheim.net

ENVIRONMENTAL IMPACT REPORT (EIR) FOR BALL ROAD BASIN GENERAL PLAN AMENDMENT & ZONE CHANGE PROJECT, LOCATED AT THE INTERSECTION OF BALL ROAD AND PHOENIX CLUB DRIVE, CITY OF ANAHEIM, ORANGE COUNTY (SCH# 2013021026)

Dear Ms. Kim:

The Department of Toxic Substances Control (DTSC) has reviewed the subject EIR. The following project description is stated in the EIR: “The Project site encompasses approximately 19.5 acres and has a holding capacity of 220 acre-feet of water. The basin is approximately 20 feet below the surrounding grade level. Overflow from the adjacent upstream Burris Recharge Basin drains into BRB. Storm water runoff from Orange County Flood Control District (OCFCD) facilities described below also drains into BRB. The BRB was intended to retain this overflow and runoff so that the water could percolate into the ground to replenish the groundwater basin. However, due to an extensive clay layer underlying the basin, BRB is incapable of significant amounts of surface recharge.”

Based on the review of the submitted document, DTSC has the following comments:

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
2. The EIR states, "The maximum concentration of benzene detected in soil was 18 µg/kg, which is greater than the SSL for benzene of 11 µg/kg in sands at a depth of 20 feet above highest groundwater. It is unclear if the benzene impacted soil was included in the area excavated during cleanup activities. Approximately 2,000 cubic yards of soil was removed from the Project site and regulatory closure by the OCHCA is reported to have been granted on June 13, 1990." DTSC is not able to evaluate whether this benzene impacted soil is properly mitigated and no residual contamination left in place at the project area.

3. The EIR further states, "Laboratory analysis of samples collected during well installation detected low levels of xylenes (up to 3 µg/kg) and toluene (up to 30 µg/kg) in soil and low levels of xylene (up to 6.3 µg/kg) in groundwater. Petroleum hydrocarbons and other VOCs were not detected in the samples. The residual concentrations of xylenes and toluene were well below RWQCB soil screening levels (SSLs) for sand at 20 feet above groundwater (toluene: 300 µg/kg; xylene: 1,750 µg/kg). Concentrations of xylene in groundwater were also well below the EPA maximum contaminant levels (MCLs) for ground water of 1,000 µg/kg (RWQCB, 1996; EPA, 2013)." DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequately addressed due to lack of relevant detailed information in the EIR. DTSC recommends soil gas sampling and vapor intrusion risk evaluation on sites with releases of volatile organic compounds (VOCs) or total petroleum hydrocarbons (TPH). DTSC recommends soil gas sampling to confirm no residual VOC/TPH contamination remain onsite and/or risk is acceptable based on applicable and relevant state guidelines.

4. The EIR states, "BRB is approximately 19.5 acres and consists of four assessor parcels (APN 253-473-01 [6.48-acres], 253-631-32 [0.31-acres], 253-631-39 [12.69-acres], and 375-221-09 [0.1-acres]) owned by the Orange County Water District, and bounded by the Santa Ana River Center Levee and the Santa Ana River to the east, Ball Road and the Burris Basin to the north, the Union Pacific Railroad to the south, and Phoenix Club Drive to the west." Railroad easements and rail yards are commonly impacted due to spillage of chemicals, fuels, and lubricants, and use of pesticides and herbicides along the tracks for weed control. DTSC recommends assessment/investigation and/or cleanup as necessary to confirm that no residual contamination associated with rail operation is present onsite.

5. If the project development involves soil export/import, proper evaluation is required. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if imported soil was used as
backfill onsite and/or backfill soil will be imported, DTSC recommends proper evaluation/sampling as necessary to ensure the backfill material is free of contamination.

6. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5380 or by email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program – Cypress

kl/sh/ja

cc: See next page
cc:  Ms. Alyssa Muto (via e-mail)  
Deputy Director  
Planning Department  
City of San Diego  
PlanningCEQA@sandiego.gov  

Governor's Office of Planning and Research (via e-mail)  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
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Mr. Dave Kereazis (via e-mail)  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
Dave.Kereazis@dtsc.ca.gov  

Mr. Shahir Haddad, Chief (via e-mail)  
Schools Evaluation and Brownfields Cleanup  
Brownfields and Environmental Restoration Program - Cypress  
Shahir.Haddad@dtsc.ca.gov  

CEQA# 2013021026
Response to Comment Letter C – Department of Toxic Substances Control

C-1: Summary of Project Description comment acknowledged. No further response is required.

C-2: Request for the EIR to identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances and that proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development of any construction if there are any recognized environmental concerns in the project area is acknowledged.

A Phase I Environmental Site Assessment (ESA) was completed for the Project Site on August 9, 2013 by Leighton Consulting, Inc. and is included as Appendix G to the Draft Environmental Impact Report. Section 3.7.2 of the DEIR provides a summary of the findings of the Hazardous Database Review conducted as part of the Phase I ESA.

The Phase I ESA disclosed that the Project Site was identified in the Environmental Data Resources, Inc. (EDR®) Radius Report in the Spills, Leaks, Investigations, and Cleanup (SLIC) database. This listing comes from the California Regional Water Control Board and is identified as Case Number “SLT8R107”. The case type is listed as “soil and groundwater”, and the case status is reported to be “Case Closed” as of June 17, 2009. Regulatory records documented a release of approximately 3,500 gallons of JP-5 jet fuel into BRB that occurred on September 19, 1989. BRB was filled with storm water at that time and an approximately two to three-foot layer of free-phase jet fuel spread across the Project site. The OCWD assumed a lead agency role to assure adequate cleanup and IT Corporation conducted the investigation and cleanup. Cleanup was reported to include removal of the jet fuel, contaminated soil, water, and vegetation; however, investigation and remediation reports were not included in the file provided by the OCWD. The release was reportedly remediated and a regulatory closure was issued on June 13, 1990. However, the cleanup activities were not well documented, deficiencies in sampling and contaminant containment were noted by the OCWD, and benzene was identified in onsite soil at concentrations of up to 18 µg/kg. These deficiencies were not addressed in the case closure rationale.

Given the potentially significant impact for exposure to contaminated soils during project construction, MM HAZ-1 requires the preparation of a Phase II Environmental Site Assessment, which will provide for the requested investigation, sampling and remedial actions overseen by the appropriate regulatory agencies, including DTSC, to be conducted prior to the new development of any construction if there are any recognized environmental concerns identified in the Phase II ESA.
C-3: The comment states that DTSC is not able to evaluate whether this benzene impacted soil is properly mitigated and no residual contamination is left in place at the project area.

Given the potentially significant impact for exposure to contaminated soils during project construction, including benzene impacted soil, MM HAZ-1 requires the preparation of a Phase II Environmental Site Assessment, which will provide for the requested investigation, sampling and remedial actions overseen by the appropriate regulatory agencies, including DTSC, to be conducted prior to the new development of any construction if there are any recognized environmental concerns identified in the Phase II ESA.

C-4: The comment states that DTSC is not able to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequately addressed and that it recommends soil gas sampling and vapor intrusion risk evaluate on sites with releases of volatile organic compounds (VOCs) or total petroleum hydrocarbons.

Given the potentially significant impact for exposure to contaminated soils during project construction, including soil vapors, MM HAZ-1 requires the preparation of a Phase II Environmental Site Assessment, which will provide for the requested investigation, sampling and remedial actions overseen by the appropriate regulatory agencies, including DTSC, to be conducted prior to the new development of any construction if there are any recognized environmental concerns identified in the Phase II ESA.

C-5: The comment states that railroad easements and rail yards [like the adjacent Union Pacific Railroad] are commonly impacted due to spillage of chemicals, fuels, and lubricants, and use of pesticides and herbicides along the tracks for weed control, and recommend assessment/investigation and/or cleanup for any residual contamination associated with rail operation.

The Phase I ESA included an exhaustive Hazardous Database Review that is summarized in Section 3.7.2 of the DEIR. None of these databases contained record of contamination due to railroad operations, including a rail yard. Nonetheless, given the potentially significant impact for exposure to contaminated soils during project construction, including from rail operations, MM HAZ-1 requires the preparation of a Phase II Environmental Site Assessment, which will provide for the requested investigation, sampling and remedial actions overseen by the appropriate regulatory agencies, including DTSC, to be conducted prior to the new development of any construction if there are any recognized environmental concerns identified in the Phase II ESA.

C-6: The comment states that proper evaluation of imported/exported soil is required and contaminated soil should be properly disposed of. Additionally, imported soil should be evaluated/sample to ensure that backfill material is free of contamination.
Given the potentially significant impact for exposure to contaminated soils during project construction, MM HAZ-1 requires the preparation of a Phase II Environmental Site Assessment, which will provide for the requested investigation, sampling and remedial actions overseen by the appropriate regulatory agencies, including DTSC, to be conducted prior to the new development of any construction if there are any recognized environmental concerns identified in the Phase II ESA.

Regarding imported soil, the Conceptual Grading Plan, shown in Figures 3.8-7, Earthwork, and Figure 3.8-8, Conceptual Grading, (Section 3.8.5, Page 203-204), identify that approximately 386,000 cubic yards of earth material would be required to bring the site up to a “mass grade” condition with proposed elevations ranging from 182 feet above mean sea level at the northwest corner to 176 feet above mean sea level at the southeast corner. MM HAZ-1 addresses this comment, which states in part:

**MM HAZ-1** – “... Additionally, a sampling plan shall be prepared and implemented prior to importing soil to the Project site for infill purposes in order to verify that imported soils will meet regulatory screening levels for commercial property use.”

**C-7**: Request to identify any required investigation and/or remediation for suspected contamination of soil and/or groundwater during construction/demolition of the project is acknowledged. To address this comment, the following MM HAZ-4 shall be added as shown in underline:

**MM HAZ-4**: Prior to the issuance of grading permits, the Property Owner/Developer shall include a note on the plans that in the event contamination of soil and/or groundwater is suspected, the Construction Contractor shall cease construction/demolition in the area and contact the City of Anaheim Planning and Building Department. The Property Owner/Developer shall perform soil/groundwater sampling with regulatory oversight by the appropriate government agency, i.e. the DTSC and/or RWQCB and obtain a Letter of No Further Action prior to resuming construction/demolition activities.

The addition of MM HAZ-4 does not require the recirculation of the DEIR prior to Certification pursuant to CEQA Guidelines § 15088.5(a)(3), as the mitigation measure is not considerably different from MM HAZ-1, and the project proponent has agreed to adopt MM HAZ-4.
2.2.4 Comment Letter D - Department of Conservation, Division of Oil, Gas, and Geothermal Resources
VIA EMAIL

Ms. Susan Kim, Principal Planner  
City of Anaheim  
Planning & Building Department  
200 South Anaheim Boulevard, MS 162  
Anaheim, CA 92805  
Skim@anaheim.net

Dear Ms. Kim:

Draft EIR – DRAFT ENVIRONMENTAL IMPACT REVIEW  
BALL ROAD BASIN GENERAL PLAN AMENDMENT & ZONE CHANGE  
SCH: 2013021026

The Department of Conservation’s Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project for impacts with Division jurisdictional authority. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Division offers the following comments for your consideration.

The project area is in Orange County and is not within an administrative oil field boundary. Division records indicate that there is no oil, gas or geothermal wells located within the project boundary as identified in the application. Division information can be found at: www.conservation.ca.gov. Individual well records are also available on the Division’s web site, or by emailing DOGDIST1@conservation.ca.gov.

The scope and content of information that is germane to Division’s responsibility are contained in Section 3000 et seq. of the Public Resources Code, and administrative regulations under Title 14, Division 2, Chapters 2, 3 and 4 of the California Code of Regulations.

If any wells, including any plugged, abandoned or unrecorded wells, are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division’s district office must be contacted to obtain information on the requirements and approval to perform remedial operations.

The possibility for future problems from geothermal wells that have been plugged and abandoned, or reabandoned, to the Division’s current specifications are remote. However, the Division recommends that a diligent effort be made to avoid building over any plugged and abandoned well.
Questions regarding the Division's Construction Site Well Review Program can be addressed to the local Division's office in Cypress by emailing DOGDIST1@conservation.ca.gov or by calling (714) 816-6847.

Sincerely,

Grace P. Brandt
Associate Oil and Gas Engineer

cc: The State Clearinghouse in the Office of Planning and Research
Tim Shular, DOC OGER
Crina Chan, DOC OGER
Jan Perez, DOGGR CEQA Unit
Chris McCullough, Facilities and Environmental Supervisor
Environmental CEQA File
Response to Comment Letter D - Department of Conservation, Division of Oil, Gas, and Geothermal Resources

D-1: The description of the role of the Department of Conservation’s Division of Oil, Gas, and Geothermal Resources (Division) is acknowledged. No further response is required.

D-2: The comment that the project area is not within an administrative oil field boundary and Division records indicate that there are no oil, gas, or geothermal wells located within the project boundary is acknowledged. No further response is required.

D-3: The comment is acknowledged. No further response is required.

D-4: The comment to contact the Division’s district office to obtain information on the requirements and approval to perform remedial plugging operations of any plugged, abandoned, or unrecorded wells that may be damaged or uncovered during excavation or grading is acknowledged. No further response is required.

D-5: The comment to make a diligent effort to avoid building over any plugged and abandoned well is acknowledged. No further response is required.

D-6: The comment is acknowledged. No further response is required.
2.2.5 Comment Letter E - Department of Transportation, District 12 (Caltrans)
July 18, 2018

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

Dear Ms. Kim,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the proposed Ball Road General Plan Amendment and Zone Change. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability.

The project proposes to amend the City of Anaheim's General Plan and Zoning Map to allow the eventual commercial development of the Ball Road Basin and the addition of Class I bicycle facilities on the perimeter of the project area. The project is located on Ball Road in the City of Anaheim, west of the Santa Ana River and east of State Route 57 (SR 57). Caltrans is a responsible agency and has the following comments:

**Transportation Planning:**

1. The project proposes the addition of Class I bicycle facilities on the northern, eastern, and southern border of the project boundary.
   a. The closest portion of the Santa Ana River (SAR) trail is located on the eastern banks of the SAR. Connecting the development to the SAR trail would increase regional connectivity to the project.
   b. The project is proposing to add a Class I bicycle facility on the section of Ball Road within project limits. The Anaheim Bicycle Master Plan states there is a proposed Class II bicycle plan on Ball Road. For the purposes of having a uniform bicycle path, consider changing all bicycle facilities on Ball Road to be either Class I or Class II.
   c. There is an unobstructed rail line on the southern border of the project. If the developers intend to create a bicycle facility on the southern border of the project, provide barriers between the development and the rail line to ensure the safety of visitors to the project area.

2. Consider adding a sidewalk to the western border of the project along Phoenix Club Drive to improve pedestrian safety and accessibility.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
3. The project is in close proximity to transit options. The City should coordinate with transit providers to promote transit use to and from the project site.
   a. OCTA Bus Route 46 stop is located on Ball Road on the northern border of the project.
   b. The project is near major attractions located in the Anaheim Resort Area and Platinum Triangle. The Anaheim Resort Transportation transit system services both the Anaheim Resort and Platinum Triangle. The City of Anaheim and Anaheim Resort Transportation should consider adding a stop at project site. This would provide transit options to the City’s attractions and provide ease of access to potential visitors.
   c. The Anaheim Regional Transportation Intermodal Center (ARTIC) is approximately a mile away from the project site. Establishing a connection to ARTIC would increase regional connectivity to the project.

4. Future development documents that fall within the project area should be circulated to Caltrans for review and concurrence.

Traffic Operations:
5. Caltrans Traffic Operations found the following discrepancies in the DEIR:
   a. The traffic volumes for Existing Plus Project scenario for the westbound (WB) Ball Road onramp onto northbound (NB) SR 57 will decrease by 4 vehicle trips during AM hours and increase by 9 vehicles during PM hours. A project of this size would have a greater impact to the Ball Road onramp. Please provide figures showing traffic volumes generated by the project at the surrounding intersections.
   b. Some intersection volumes are not balanced. For example, traffic volumes for Existing PM WB traffic volume exiting Phoenix Club Drive/Ball Road is 1,472 vehicles while the receiving PM WB section for the SR 57 Ramps/Ball Road is 1,683 vehicles. There are no access points that would justify the increase in volume of over 200 vehicles. Please provide figures showing traffic volumes generated by the project at the surrounding intersections.

6. For Caltrans signalized intersection analysis, use the actual Peak Hour Factor from project traffic counts and the signal cycle lengths from Caltrans Electrical Systems Branch.

7. Freeway mainline facilities are to be analyzed using the Highway Capacity Manual (HCM) 2010. The City shall provide merge and diverge analysis were appropriate. Segments are to be analyzed as basic, merge (on ramp), diverge (off ramp), or weaving per the HCM.
   a. The segment along NB and southbound (SB) SR 57 from Katella Avenue to Ball Road should not be analyzed as a weaving segment.
   b. The segments along both NB and SB SR-57 between Ball Road and Lincoln Avenue were not analyzed as weaving segments because the “…weaving distance is greater than 2,500 feet which is beyond the parameters of the HCM 2010 software.” According to the HCM 2010 the maximum weaving length is a

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calculated value with no set value. Submit analysis for the weaving distance from Katella Avenue to Ball Road with the calculated maximum value.


10. Peak hour mainline traffic volumes were calculated using ADT volumes along with “K” and “D” factors. The calculated Existing Year PM Peak Hour Volume for NB SR 57 from SR 22 to Orangewood is over 11,000 vehicles per hour yet the values obtained from the Caltrans Performance Measurement System (PeMS) are under 7,000 vehicles per hour. Therefore, use PeMS to obtain the peak hour volumes for freeway facilities.

Design:
11. The NB onramp to SR 57 at Ball Road is currently near capacity and as has been identified for future improvements. The City shall coordinate with Caltrans concerning future developments in the project area to ensure compatibility with the improvements on SR 57.

12. All facilities and features constructed on Caltrans Right-of-Way (ROW) shall conform to Caltrans' design standards, manuals, guides, policies and procedures.

Stormwater/NPDES:
13. Realignment of the Chantilly Storm Drain (CSD) must not interfere with upstream connections or cause flooding. Caltrans conditionally concurs with the project provided that Caltrans Stormwater/NPDES and Hydraulic Branch get the opportunity to review the realignment of CSD.

Permits:
14. Any project work proposed in the vicinity of the State ROW would require an encroachment permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans’s requirements for work done within State ROW, additional documentation would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific details for Encroachment Permits procedure, please refer to the Caltrans’s Encroachment Permits Manual at: http://www.dot.ca.gov/hq/traffops/developserv/permits/

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Jude Miranda at (657) 328-6229 or Jude.Miranda@dot.ca.gov.

Sincerely,

[Signature]

SCOTT SHELLEY
Branch Chief, Regional-IGR-Transit Planning
District 12

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Response to Comment Letter E - Department of Transportation, District 12 (Caltrans)

E-1: The comment is acknowledged. No further response is required.

E-2: The comment is acknowledged. No further response is required.

E-3: The comment that connection to the Santa Ana River Trail on the eastern banks of the Santa Ana River is acknowledged. The Santa Ana River Trail is located in the City of Orange at this location and any connections would require coordination with the City of Orange. No further response is required.

E-4: The comment to change all bicycle facilities on Ball Road to be either Class I or Class II for the purposes of a uniform bicycle path is acknowledged. The Class II bike lane on Ball Road would be within the public street right-of-way and provide the potential connection to the Santa Ana River Trail as noted in Comment E-3. The Class I bike path on the project site would serve the north/south connection on the project site. No further response is required.

E-5: The comment to provide a barrier between the rail line and a bicycle facility on the southern border on the project site is acknowledged. No further response is required.

E-6: The comment to add a sidewalk on the western border of the project site along Phoenix Club Drive is acknowledged. The Property Owner/Developer would be required to improve Phoenix Club Drive to City standards, which would include sidewalk, curb, and gutter, upon development of the project site. No further response is required.

E-7: The comment to coordinate with transit providers to promote transit use to and from the project site is acknowledged. No further response is required.

E-8: The comment that OCTA Bus Route 46 stops on Ball Road is acknowledged. No further response is required.

E-9: The comment that the City and the Anaheim Resort Transportation should consider adding a stop at the project site is acknowledged. No further response is required.

E-10: The comment to establish a connection to the Anaheim Regional Transportation Intermodal Center is acknowledged. No further response is required.

E-11: The comment to circulate future development documents in the project area to Caltrans for review and concurrence is acknowledged. No further response is required.

E-12: The comment regarding Existing Plus Project scenario traffic volumes for the westbound Ball Road onramp to the northbound SR-57 would result in greater impacts to the Ball Road
onramp than disclosed is acknowledged. Future traffic volumes were derived using the Anaheim Traffic Analysis Model (ATAM), which is a traffic model certified by OCTA to be consistent with the OCTA regional model. It is a socio-economic based model, as required by OCTA and SCAG. The traffic assignment is dynamic, being that if a route is too congested, it will actively look for other routes, which similar to actual driver behavior. For the 2035 Buildout Baseline (no project) conditions, Ball Road is congested in ATAM. Therefore, as the Proposed Project increases traffic on Ball Road, it is expected that through traffic on Ball Road will divert to other east-west streets. ATAM identified Katella Avenue as the route that would absorb some of the through traffic on Ball Road, which is why there are several study intersections on Katella Avenue. This traffic diversion is why the ramp volumes do not drastically change during the peak hours. Project traffic volumes can be derived from the figures in the DEIR, and the post-processed ATAM traffic volumes are provided in Appendix B of the Traffic Impact Analysis Update (TIA, updated February 20, 2017).

**E-13:** The comment regarding balance of intersection volumes is acknowledged. The Proposed Project’s TIA update analyzed the AM and PM peak hours of the study area intersections. In the case of adjacent intersections with no intermediate driveways, the peak hour interval will usually be different, even though the counts are typically collected on the same day. In most cases where the neighboring ramp volumes differ, if the same peak hour interval was used, then one of the intersections would not be analyzed during its actual peak hour. As a result, the DEIR/TIA would not be able to analyze the full potential impact at that intersection since the true peak hour would not be used in the analysis. Project traffic volumes can be derived from the figures in the DEIR, and the post-processed ATAM traffic volumes are provided in Appendix B of the Traffic Impact Analysis Update (TIA, updated February 20, 2017).

**E-14:** The request to use actual Peak Hour Factor from project traffic counts and the signal cycle lengths from Caltrans Electrical Systems Branch for Caltrans signalized intersection analysis is acknowledged. The LOS analysis of the signalized Caltrans intersections was re-analyzed with the actual peak hour factors (PHF) from the traffic counts, and signal cycle lengths from either timing cards from the Caltrans Electrical Systems Branch (SR-57/Katella Avenue ramps) or observed peak hour cycle lengths (SR-57/Ball Road ramps and SR-55/Katella Avenue ramps). The raw cycle length observation sheets and revised LOS worksheets are included in Attachment A – *Ramp Intersection Cycle Length Surveys* and Attachment B – *Ramp Intersection LOS Worksheets*. This was done for the Existing and Existing plus Project scenarios. For the Buildout 2035 Baseline and 2035 plus Project conditions, cycle lengths were optimized, and a default PHF of 0.92 was used. According to HCM 2010, Section 18, the PHF should be based on local traffic peaking trends. Local traffic peaking trends are expected to change in 2035 from the existing conditions due to the buildout of land uses in the City, as well as, changes in traffic patterns due to buildout of the City’s street network, and County’s regional transportation network. Table 1 – *Caltrans Ramp Intersection LOS Summary* provides the revised intersection LOS results. Based on the revised LOS analysis, the findings remain the same, in that the Proposed Project would not significantly impact any of the signalized Caltrans ramp
intersections with the exception of SR-55 southbound ramps/Katella Avenue which was already identified as being impacted by the Proposed Project in the DEIR. The intersection of SR-55 northbound ramps/Katella Avenue is currently operating, and is forecast to operate, with LOS E/F conditions, however, the Proposed Project’s addition to delay would be 0.0 to 0.4 seconds, which would not have a measurable impact to LOS.

**E-15:** The comment that freeway mainline facilities are to be analyzed using the Highway Capacity Manual (HCM) 2010 to provide merge and diverge analysis is acknowledged and further addressed in responses E-16 and E-17. The following are the results, shown in Table 2 – Freeway Segment Merge, Diverge, Weave LOS Summary of the Buildout 2035 Baseline and Buildout 2035 plus Project freeway facilities analysis using the Highway Capacity Manual (HCM 2010) methodology. Segments were analyzed as basic, merge, diverge, or weaving per the HCM. Freeway facilities analysis worksheets are attached. Based on the table, the results are generally consistent with the DEIR in that significant unavoidable impacts were found on the freeway mainline facilities.

**E-16:** According to HCM 2010 methodology and discussions with the City of Anaheim, the northbound and southbound segments of SR-57, between Katella Avenue and Ball Road, have been analyzed as weaving segments due to the distances and traffic volumes between the on-ramps and off-ramps (in both directions). The calculated Lmax, value for this segment is greater than the short length (SL) of the segment which warranted a weaving analysis per the HCM. Specifically, the northbound SR-57 segment from the Katella Avenue on-ramp to the Ball Road off-ramp, which contains a 2,130 foot SL, with an Lmax of 3,608 feet. Attachment C – HCM Merge, Diverge, and Weaving Analysis Worksheets provide the Lmax and LS values. The analysis of this segment of SR-57 is consistent with the freeway analyses prepared for the Platinum Triangle Expansion Project.

**E-17:** Per HCM, the northbound segment of SR-57, Ball Road to Lincoln Avenue, was analyzed as merge/diverge segment, while the southbound segment was analyzed as weaving segment due to the Lmax/LS comparison and a presence of an existing exit-only (auxiliary) lane. See response to Comment E-16 regarding the analysis of weaving distance. The calculated Lmax, values for the northbound and southbound segments of SR-57, between Katella Avenue and Ball Road, are greater than the short length (SL) of the segment which warranted a weaving analysis per the HCM. Attachment C – HCM Merge, Diverge, and Weaving Analysis Worksheets provide the Lmax and LS values. The analysis of this segment of SR-57 is consistent with the freeway analyses prepared for the Platinum Triangle Expansion Project.

**E-18:** Use of ITE Trip Generation rates and pass-by and diverted links trips that would have been manually assigned to the buildout street network would have overstated project traffic impacts. As previously discussed in the response to Comment E-12, traffic volumes were appropriately derived using the Anaheim Traffic Analysis Model (ATAM), which is a traffic model certified by OCTA to be consistent with the OCTA regional model. It is a socio-economic
based model, as required by OCTA and SCAG. Since project impacts were determined for the Buildout 2035 year, use of ATAM for project trip generation and assignment was the appropriate tool to determine project impacts. The project traffic assignment in ATAM is dynamic, simulating actual driver behavior, including pass-by and diverted trip making. Whereas, use of the ITE Trip Generation manual would have overstated project traffic impacts in the buildout condition.

E-19: A 95th percentile queue analysis was prepared at Caltrans off-ramp intersections using Synchro, while the methodology in the Caltrans Ramp Meter Design Manual (2016), supplemented with the Crommelin queuing methodology, included in Attachment D – Crommelin Methodology Graph, was used for the on-ramp queue analysis. The Crommelin methodology calculates minimum vehicle storage reservoirs based on the ratio of vehicle demand and service rate at different confidence intervals. In order to display the most conservative queuing calculations, the highest confidence level of 99% was used. Table 3 - Buildout 2035 Intersection Off-Ramp Queuing Level of Service Summary presents the results of the Buildout 2035 plus Project off-ramp queue analysis. Table 4 - Buildout 2035 Intersection On-Ramp Queuing Level of Service Summary presents the results of the Buildout 2035 plus Project on-ramp queue analysis. Attachment E – Off-Ramp Queuing includes the ramp queuing analysis worksheets.

Based on the off-ramp queuing analysis in Table 3 - Buildout 2035 Intersection Off-Ramp Queuing Level of Service Summary, the northbound and southbound off-ramps at SR-55/Katella Avenue are forecast to have queues that would exceed their existing lane storage lengths. Based on the on-ramp queuing analysis in Table 4 - Buildout 2035 Intersection On-Ramp Queuing Level of Service Summary, all metered on-ramp queues would be sufficiently stored within their existing storage lanes.

E-20: The freeway mainline segment analysis was re-analyzed using existing traffic volumes from the Caltrans Performance Measurement System (PeMS). Table 5 - Existing plus Project Mainline Segment LOS Summary presents the results of the revised Existing and Existing plus Project freeway mainline segment analysis, detailed in Attachment F – Freeway Mainline Analysis Worksheets. The DEIR identified deficient mainline segments of SR-57 in the Existing Condition, and the Proposed Project would contribute traffic volumes to those segments. However, based on the revised analysis using PeMS traffic data, all the study area freeway mainline segments are currently operating, and are forecast to operate with project traffic, at LOS D or better in both peak hours.

E-21: The comment for the City to coordinate with Caltrans concerning future developments in the Proposed Project area to ensure compatibility with the identified future improvements on the NB SR-57 onramp at Ball Road is acknowledged. No further response is required.

E-22: The comment that all facilities and features constructed on Caltrans Right-of-Way shall
conform to Caltrans’ design standards, manuals, guides, policies, and procedures is acknowledged. No further response is required.

**E-23:** The comment that Caltrans conditionally concurs with the project to realign the Chantilly Storm Drain (CSD), provided that the Caltrans Stormwater/NPDES and Hydraulic Branch have the opportunity to review the realignment of the CSD, is acknowledged. No further response is required.

**E-24:** The comment that any project work proposed in the vicinity of the State ROW would require an encroachment permit and all environmental concerns must be adequately addressed is acknowledged. The City/Property Owner/Developer would coordinate with Caltrans for any work within or near the State ROW. No further response is required.

**E-25:** The comment is acknowledged. No further response is required.
### Table 1 – Caltrans Ramp Intersection LOS Summary

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<td><strong>Buildout 2035 plus Project</strong></td>
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**Notes:**
- Delay – Delay reported as Control Delay and expressed in seconds
- LOS – Level of Service
- XXX - Mainline segment operates with unsatisfactory LOS.
- The project’s addition to delay would be 0.0 to 0.4 seconds, which would not have a measurable impact to LOS.
### Table 2 – Freeway Segment Merge, Diverge, Weave LOS Summary

<table>
<thead>
<tr>
<th>Freeway</th>
<th>Ramp or Segment</th>
<th>Analysis</th>
<th>AM Peak Hour Density (pc/ln/mi)</th>
<th>PM Peak Hour Density (pc/ln/mi)</th>
<th>LOS</th>
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<td><strong>SR-57 Northbound</strong></td>
<td>Katella Ave on-ramp (EB Katella Ave)</td>
<td>Merge</td>
<td>27.1</td>
<td>28.0</td>
<td>C</td>
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<tr>
<td></td>
<td>WB Katella Ave on-ramp to Ball Rd off-ramp</td>
<td>Weave</td>
<td>33.9</td>
<td>D</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>Ball Road on-ramp (EB Ball Rd)</td>
<td>Merge</td>
<td>26.2</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>Ball Road on-ramp (WB Ball Rd)</td>
<td>Merge</td>
<td>24.8</td>
<td>C</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>Lincoln Avenue off-ramp</td>
<td>Diverge</td>
<td>32.5</td>
<td>D</td>
<td>–</td>
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<tr>
<td><strong>SR-57 Southbound</strong></td>
<td>Lincoln on-ramp to Ball Rd off-ramp</td>
<td>Weave</td>
<td>–</td>
<td>F</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>Ball Road on-ramp (WB Ball Rd)</td>
<td>Merge</td>
<td>–</td>
<td>F</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>EB Ball Road on-ramp to Katella off-ramp</td>
<td>Weave</td>
<td>–</td>
<td>F</td>
<td>–</td>
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<td><strong>Buildout 2035 plus Project</strong></td>
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<tr>
<td><strong>SR-57 Northbound</strong></td>
<td>Katella Ave on-ramp (EB Katella Ave)</td>
<td>Merge</td>
<td>27.1</td>
<td>28.0</td>
<td>C</td>
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<tr>
<td></td>
<td>WB Katella Ave on-ramp to Ball Rd off-ramp</td>
<td>Weave</td>
<td>34.6</td>
<td>D</td>
<td>–</td>
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<tr>
<td></td>
<td>Ball Road on-ramp (EB Ball Rd)</td>
<td>Merge</td>
<td>26.2</td>
<td>C</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>Ball Road on-ramp (WB Ball Rd)</td>
<td>Merge</td>
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<td>C</td>
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<tr>
<td></td>
<td>Lincoln Avenue off-ramp</td>
<td>Diverge</td>
<td>32.4</td>
<td>D</td>
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<td><strong>SR-57 Southbound</strong></td>
<td>Lincoln on-ramp to Ball Rd off-ramp</td>
<td>Weave</td>
<td>–</td>
<td>F</td>
<td>–</td>
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<tr>
<td></td>
<td>Ball Road on-ramp (WB Ball Rd)</td>
<td>Merge</td>
<td>–</td>
<td>F</td>
<td>–</td>
</tr>
<tr>
<td></td>
<td>EB Ball Road on-ramp to Katella off-ramp</td>
<td>Weave</td>
<td>–</td>
<td>F</td>
<td>–</td>
</tr>
</tbody>
</table>

**Notes:**

- LOS based on HCM methodology, analyzed in the *2010 Highway Capacity Software* (HCS).
- XXX – Mainline segment operates with unsatisfactory LOS.
- -- Demand exceeds capacity = LOS F
- 1 – Density is presented in “passenger cars per lane per mile.”
### Table 3 – Buildout 2035 Intersection Off-Ramp Queuing Level of Service Summary

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Movement</th>
<th>Existing Pocket Length&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Buildout 2035 Baseline Conditions&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Buildout 2035 plus Project&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Change</th>
<th>Exceeds Turn Pocket Length?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>PM</td>
<td>AM</td>
<td>PM</td>
<td>AM</td>
</tr>
<tr>
<td>8. SR 57 SB ramps/Ball Road</td>
<td>SBL</td>
<td>600</td>
<td>269</td>
<td>173</td>
<td>400</td>
<td>198</td>
</tr>
<tr>
<td></td>
<td>SBR</td>
<td>600</td>
<td>173</td>
<td>282</td>
<td>271</td>
<td>301</td>
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<tr>
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<td>123</td>
<td>221</td>
<td>143</td>
<td>228</td>
</tr>
<tr>
<td></td>
<td>NBR</td>
<td>600</td>
<td>162</td>
<td>178</td>
<td>194</td>
<td>213</td>
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<td>SBL</td>
<td>750</td>
<td>194</td>
<td>217</td>
<td>188</td>
<td>222</td>
</tr>
<tr>
<td></td>
<td>SBR</td>
<td>750</td>
<td>241</td>
<td>270</td>
<td>268</td>
<td>270</td>
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<tr>
<td>25. SR 57 NB ramps/Katella Avenue</td>
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<td>111</td>
<td>304</td>
<td>98</td>
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<td>NBR</td>
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<td>139</td>
<td>351</td>
<td>114</td>
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<td>195</td>
<td>961</td>
<td>272</td>
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<td></td>
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<td>500</td>
<td>623</td>
<td>360</td>
<td>616</td>
<td>443</td>
</tr>
<tr>
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<td>400</td>
<td>618</td>
<td>609</td>
<td>626</td>
<td>620</td>
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<td></td>
<td>NBR</td>
<td>400</td>
<td>536</td>
<td>436</td>
<td>554</td>
<td>431</td>
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<sup>1</sup> – Based on 95<sup>th</sup> Percentile Queue length in SimTraffic 10.

<sup>2</sup> – Measured in Feet.
<table>
<thead>
<tr>
<th>Intersection</th>
<th>Movement</th>
<th>Existing Pocket Length 2</th>
<th>Buildout 2035 Baseline Conditions 1</th>
<th>Buildout 2035 plus Project 2</th>
<th>Change</th>
<th>Exceeds Turn Pocket Length?</th>
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<td>600</td>
<td>269 AM 173 PM 400 AM 198 PM 131 AM 25 PM 19</td>
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<tr>
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<td>PM</td>
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<td>173 AM 282 PM 271 AM 301 PM 98 AM 19 PM 98</td>
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<td>AM</td>
<td>600</td>
<td>123 AM 221 PM 143 AM 228 PM 20 AM 7 PM 7</td>
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<td>no</td>
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<tr>
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<td>PM</td>
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<td>162 AM 178 PM 194 AM 213 PM 32 AM 35 PM 35</td>
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<td>750</td>
<td>194 AM 217 PM 188 AM 222 PM -6 AM 5 PM 5</td>
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<td>no</td>
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<tr>
<td></td>
<td>PM</td>
<td>750</td>
<td>241 AM 270 PM 268 AM 270 PM 27 AM 0 PM 0</td>
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<td>698 AM 195 PM 961 AM 272 PM 263 AM 77 PM yes</td>
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<td>536 AM 436 PM 554 AM 431 PM 18 PM -5 PM -5</td>
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<td>yes</td>
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</tr>
</tbody>
</table>

1 = Based on 95th Percentile Queue length in SimTraffic 10.
2 = Measured in Feet.
XX = Off-Ramp queue exceeds storage length and spills onto mainline freeway.
### Table 4 – Buildout 2035 Intersection On-Ramp Queuing Level of Service Summary

<table>
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<tr>
<th>Intersection</th>
<th>Storage Length</th>
<th>Peak Hour</th>
<th>Vol. Discharge Rate</th>
<th>Intensity Factor</th>
<th>No. of Veh</th>
<th>Length</th>
<th>Vol. Discharge Rate</th>
<th>Intensity Factor</th>
<th>No. of Veh</th>
<th>Length</th>
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<td>900</td>
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<td>0.69</td>
<td>5</td>
<td>110</td>
<td>653</td>
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<td>5</td>
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<td>AM</td>
<td>613</td>
<td>900</td>
<td>0.68</td>
<td>5</td>
<td>110</td>
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<td>0.69</td>
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<td></td>
<td>PM</td>
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<td>44</td>
<td>360</td>
<td>0.40</td>
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<tr>
<td>39. SR 55 NB/Katella (EB)</td>
<td>750</td>
<td>AM</td>
<td>291</td>
<td>1800</td>
<td>0.16</td>
<td>1</td>
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</table>

1 – Discharge rate of 900 vehicles per hour per lane is based on a typical Caltrans meter rate of 4 seconds per vehicle.
2 – Intensity Factor = Volume/Discharge
3 – Calculated according to Crommelin Methodology 99% confidence level
4 – Measured in feet, approximately 22 feet per vehicle
### Table 5 – Existing plus Project Mainline Segment LOS Summary

<table>
<thead>
<tr>
<th>Freeway</th>
<th>From</th>
<th>To</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
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<tr>
<td></td>
<td>Density (pc/ln/mi)</td>
<td>LOS</td>
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<td><strong>Existing Condition</strong></td>
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<td>SR-57 Northbound</td>
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<td>Ball Rd</td>
<td>Lincoln Ave</td>
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<td><strong>SR-57 Southbound</strong></td>
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<td><strong>Existing plus Project</strong></td>
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<td>SR-91</td>
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</table>

Notes: LOS based on HCM methodology, analyzed in the 2010 Highway Capacity Software (HCS).

**XXX** - Mainline segment operates with unsatisfactory LOS.

1 - Density is presented in "passenger cars per lane per mile".
2.2.6 Comment Letter F - Office of Planning and Research
July 19, 2018

Susan Kim  
City of Anaheim  
200 S. Anaheim Boulevard, MS 162  
Anaheim, CA 92805

Subject: EIR No. 345 for the Ball Road Basin General Plan Amendment and Zone Change  
SCH#: 2013021026

Dear Susan Kim:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 18, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments; we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency
The Orange County Water District is proposing to amend the City of Anaheim's General Plan and Zoning Map to allow the eventual commercial development for the Ball Road Basin. The proposed project would change the City's General Plan Land Use designation for the project site from Open Space to General Commercial and the Zoning from the Transitional and Industrial Zones to the General commercial Zone. In addition, the proposed project includes amending the General Plan Circulation and Green Elements to add a Planned Class 1 Bike Path/Trail Study Area along the northern, eastern, and southern edges of the Project site. The proposed project does not include a specific development plan for the project site.
VIA EMAIL

Ms. Susan Kim, Principal Planner
City of Anaheim
Planning & Building Department
200 South Anaheim Boulevard, MS 162
Anaheim, CA 92805
Skim@anaheim.net

Dear Ms. Kim:

Draft EIR – DRAFT ENVIRONMENTAL IMPACT REVIEW
BALL ROAD BASIN GENERAL PLAN AMENDMENT & ZONE CHANGE
SCH: 2013021026

The Department of Conservation’s Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project for impacts with Division jurisdictional authority. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Division offers the following comments for your consideration.

The project area is in Orange County and is not within an administrative oil field boundary. Division records indicate that there is no oil, gas or geothermal wells located within the project boundary as identified in the application. Division information can be found at: www.conservation.ca.gov. Individual well records are also available on the Division’s web site, or by emailing DOGDIST1@conservation.ca.gov.

The scope and content of information that is germane to Division’s responsibility are contained in Section 3000 et seq. of the Public Resources Code, and administrative regulations under Title 14, Division 2, Chapters 2, 3 and 4 of the California Code of Regulations.

If any wells, including any plugged, abandoned or unrecorded wells, are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division’s district office must be contacted to obtain information on the requirements and approval to perform remedial operations.

The possibility for future problems from geothermal wells that have been plugged and abandoned, or reabandoned, to the Division’s current specifications are remote. However, the Division recommends that a diligent effort be made to avoid building over any plugged and abandoned well.
Questions regarding the Division's Construction Site Well Review Program can be addressed to the local Division's office in Cypress by emailing DOGDIST1@conservation.ca.gov or by calling (714) 816-5847.

Sincerely,

Grace P. Brandt
Associate Oil and Gas Engineer

cc: The State Clearinghouse in the Office of Planning and Research
   Tim Shular, DOC OGER
   Crina Chan, DOC OGER
   Jan Perez, DOGGR CEQA Unit
   Chris McCullough, Facilities and Environmental Supervisor
   Environmental CEQA File
June 25, 2018

Ms. Susan Kim
City Hall
City of Anaheim
Planning Department
200 S. Anaheim Blvd, MS 162
Anaheim, California 92805
sklm@anaheim.net

ENVIRONMENTAL IMPACT REPORT (EIR) FOR BALL ROAD BASIN GENERAL PLAN AMENDMENT & ZONE CHANGE PROJECT, LOCATED AT THE INTERSECTION OF BALL ROAD AND PHOENIX CLUB DRIVE, CITY OF ANAHEIM, ORANGE COUNTY (SCH# 2013021026)

Dear Ms. Kim:

The Department of Toxic Substances Control (DTSC) has reviewed the subject EIR. The following project description is stated in the EIR: “The Project site encompasses approximately 19.5 acres and has a holding capacity of 220 acre-feet of water. The basin is approximately 20 feet below the surrounding grade level. Overflow from the adjacent upstream Burris Recharge Basin drains into BRB. Storm water runoff from Orange County Flood Control District (OCFCD) facilities described below also drains into BRB. The BRB was intended to retain this overflow and runoff so that the water could percolate into the ground to replenish the groundwater basin. However, due to an extensive clay layer underlying the basin, BRB is incapable of significant amounts of surface recharge.”

Based on the review of the submitted document, DTSC has the following comments:

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
2. The EIR states, "The maximum concentration of benzene detected in soil was 18 μg/kg, which is greater than the SSL for benzene of 11 μg/kg in sands at a depth of 20 feet above highest groundwater. It is unclear if the benzene impacted soil was included in the area excavated during cleanup activities. Approximately 2,000 cubic yards of soil was removed from the Project site and regulatory closure by the OCHCA is reported to have been granted on June 13, 1990." DTSC is not able to evaluate whether this benzene impacted soil is properly mitigated and no residual contamination left in place at the project area.

3. The EIR further states, "Laboratory analysis of samples collected during well installation detected low levels of xylenes (up to 3 μg/kg) and toluene (up to 30 μg/kg) in soil and low levels of xylene (up to 6.3 μg/kg) in groundwater. Petroleum hydrocarbons and other VOCs were not detected in the samples. The residual concentrations of xylenes and toluene were well below RWQCB soil screening levels (SSLs) for sand at 20 feet above groundwater (toluene: 300 μg/kg; xylene: 1,750 μg/kg). Concentrations of xylene in groundwater were also well below the EPA maximum contaminant levels (MCLs) for ground water of 1,000 μg/kg (RWQCB, 1996; EPA, 2013)." DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequately addressed due to lack of relevant detailed information in the EIR. DTSC recommends soil gas sampling and vapor intrusion risk evaluation on sites with releases of volatile organic compounds (VOCs) or total petroleum hydrocarbons (TPH). DTSC recommends soil gas sampling to confirm no residual VOC/TPH contamination remain onsite and/or risk is acceptable based on applicable and relevant state guidelines.

4. The EIR states, "BRB is approximately 19.5 acres and consists of four assessor parcels (APN 253-473-01 [6.48-acres], 253-631-32 [0.31-acres], 253-631-39 [12.69-acres], and 375-221-09 [0.1-acres]) owned by the Orange County Water District, and bounded by the Santa Ana River Center Levee and the Santa Ana River to the east, Ball Road and the Burris Basin to the north, the Union Pacific Railroad to the south, and Phoenix Club Drive to the west." Railroad easements and rail yards are commonly impacted due to spillage of chemicals, fuels, and lubricants, and use of pesticides and herbicides along the tracks for weed control. DTSC recommends assessment/investigation and/or cleanup as necessary to confirm that no residual contamination associated with rail operation is present onsite.

5. If the project development involves soil export/import, proper evaluation is required. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if imported soil was used as
backfill onsite and/or backfill soil will be imported, DTSC recommends proper evaluation/sampling as necessary to ensure the backfill material is free of contamination.

6. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5380 or by email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham  
Project Manager  
Brownfields Restoration and School Evaluation Branch  
Site Mitigation and Restoration Program – Cypress

kl/sh/ja

cc: See next page
Ms. Susan Kim  
June 25, 2018  
Page 4

cc:  Ms. Alyssa Muto (via e-mail)  
Deputy Director  
Planning Department  
City of San Diego  
PlanningCEQA@sandiego.gov

Governor’s Office of Planning and Research (via e-mail)  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)  
Schools Evaluation and Brownfields Cleanup  
Brownfields and Environmental Restoration Program - Cypress  
Shahir.Haddad@dtsc.ca.gov

CEQA# 2013021026
July 18, 2018

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

Dear Ms. Kim,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the proposed Ball Road General Plan Amendment and Zone Change. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability.

The project proposes to amend the City of Anaheim’s General Plan and Zoning Map to allow the eventual commercial development of the Ball Road Basin and the addition of Class I bicycle facilities on the perimeter of the project area. The project is located on Ball Road in the City of Anaheim, west of the Santa Ana River and east of State Route 57 (SR 57). Caltrans is a responsible agency and has the following comments:

**Transportation Planning:**

1. The project proposes the addition of Class I bicycle facilities on the northern, eastern, and southern border of the project boundary.
   a. The closest portion of the Santa Ana River (SAR) trail is located on the eastern banks of the SAR. Connecting the development to the SAR trail would increase regional connectivity to the project.
   b. The project is proposing to add a Class I bicycle facility on the section of Ball Road within project limits. The Anaheim Bicycle Master Plan states there is a proposed Class II bicycle plan on Ball Road. For the purposes of having a uniform bicycle path, consider changing all bicycle facilities on Ball Road to be either Class I or Class II.
   c. There is an unobstructed rail line on the southern border of the project. If the developers intend to create a bicycle facility on the southern border of the project, provide barriers between the development and the rail line to ensure the safety of visitors to the project area.

2. Consider adding a sidewalk to the western border of the project along Phoenix Club Drive to improve pedestrian safety and accessibility.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability."
3. The project is in close proximity to transit options. The City should coordinate with transit providers to promote transit use to and from the project site.
   a. OCTA Bus Route 46 stop is located on Ball Road on the northern border of the project.
   b. The project is near major attractions located in the Anaheim Resort Area and Platinum Triangle. The Anaheim Resort Transportation transit system services both the Anaheim Resort and Platinum Triangle. The City of Anaheim and Anaheim Resort Transportation should consider adding a stop at project site. This would provide transit options to the City’s attractions and provide ease of access to potential visitors.
   c. The Anaheim Regional Transportation Intermodal Center (ARTIC) is approximately a mile away from the project site. Establishing a connection to ARTIC would increase regional connectivity to the project.

4. Future development documents that fall within the project area should be circulated to Caltrans for review and concurrence.

Traffic Operations:
5. Caltrans Traffic Operations found the following discrepancies in the DEIR:
   a. The traffic volumes for Existing Plus Project scenario for the westbound (WB) Ball Road onramp onto northbound (NB) SR 57 will decrease by 4 vehicle trips during AM hours and increase by 9 vehicles during PM hours. A project of this size would have a greater impact to the Ball Road onramp. Please provide figures showing traffic volumes generated by the project at the surrounding intersections.
   b. Some intersection volumes are not balanced. For example, traffic volumes for Existing PM WB traffic volume exiting Phoenix Club Drive/Ball Road is 1,472 vehicles while the receiving PM WB section for the SR 57 Ramps/Ball Road is 1,683 vehicles. There are no access points that would justify the increase in volume of over 200 vehicles. Please provide figures showing traffic volumes generated by the project at the surrounding intersections.

6. For Caltrans signalized intersection analysis, use the actual Peak Hour Factor from project traffic counts and the signal cycle lengths from Caltrans Electrical Systems Branch.

7. Freeway mainline facilities are to be analyzed using the Highway Capacity Manual (HCM) 2010. The City shall provide merge and diverge analysis were appropriate. Segments are to be analyzed as basic, merge (on ramp), diverge (off ramp), or weaving per the HCM.
   a. The segment along NB and southbound (SB) SR 57 from Katella Avenue to Ball Road should not be analyzed as a weaving segment.
   b. The segments along both NB and SB SR-57 between Ball Road and Lincoln Avenue were not analyzed as weaving segments because the “...weaving distance is greater than 2,500 feet which is beyond the parameters of the HCM 2010 software.” According to the HCM 2010 the maximum weaving length is a

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calculated value with no set value. Submit analysis for the weaving distance from Katella Avenue to Ball Road with the calculated maximum value.

8. Project trip generation was produced using Anaheim Traffic Analysis Model in consideration of pass-by, internal trip capture, and diverted link trips. The latest edition of the Institute of Transportation Engineers’ Trip Generation report should be used for trip generation forecasts. Please refer to Caltrans’ Guide For The Preparation of Traffic Impact Studies regarding trip generation rates, pass-by trips, and captured trips. 
http://www.dot.ca.gov/hq/tpp/offices/oep/igr_ceqa_files/tsguide.pdf

9. Include 95th-percentile queue analysis for Caltrans intersections and onramp locations. Identify impacts to queue lengths for offramps and turn bays, as well as ramp storage. Refer to Caltrans Ramp Meter Design Manual 2016.
http://www.dot.ca.gov/trafficops/tm/docs/RMDM.pdf

10. Peak hour mainline traffic volumes were calculated using ADT volumes along with “K” and “D” factors. The calculated Existing Year PM Peak Hour Volume for NB SR 57 from SR 22 to Orangewood is over 11,000 vehicles per hour yet the values obtained from the Caltrans Performance Measurement System (PeMS) are under 7,000 vehicles per hour. Therefore, use PeMS to obtain the peak hour volumes for freeway facilities.

**Design:**

11. The NB onramp to SR 57 at Ball Road is currently near capacity and as has been identified for future improvements. The City shall coordinate with Caltrans concerning future developments in the project area to ensure compatibility with the improvements on SR 57.

12. All facilities and features constructed on Caltrans Right-of-Way (ROW) shall conform to Caltrans’ design standards, manuals, guides, policies and procedures.

**Stormwater/NPDES:**

13. Realignment of the Chantilly Storm Drain (CSD) must not interfere with upstream connections or cause flooding. Caltrans conditionally concurs with the project provided that Caltrans Stormwater/NPDES and Hydraulic Branch get the opportunity to review the realignment of CSD.

**Permits:**

14. Any project work proposed in the vicinity of the State ROW would require an encroachment permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans’s requirements for work done within State ROW, additional documentation would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific details for Encroachment Permits procedure, please refer to the Caltrans’s Encroachment Permits Manual at: http://www.dot.ca.gov/hq/traffops/developserv/permits/

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
City of Anaheim
July 18, 2018
Page 4

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Jude Miranda at (657) 328-6229 or Jude.Miranda@dot.ca.gov.

Sincerely,

[Signature]

MAYAN MALANI FOR

SCOTT SHELLEY
Branch Chief, Regional-IGR-Transit Planning
District 12

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."
Response to Comment Letter F – Office of Planning and Research

F-1: The comment regarding the state agencies who reviewed and commented on the Draft EIR is acknowledged. No further response is required.

F-2: The comment is acknowledged. No further response is required.

F-3: The comment regarding the enclosed comment letters from commenting agencies is acknowledged. The enclosed comment letters were from the Department of Conservation (Comment Letter D), The Department of Toxic Substances Control (Comment Letter C), and the Department of Transportation District 12 (Caltrans) (Comment Letter E). The responses to comments on each of those letters are listed with their respective comment letters. No further response is required.

F-4: The comment is acknowledged. No further response is required.
2.2.7 Comment Letter G – City of Orange
July 23, 2018

Susan Kim
City of Anaheim
200 S Anaheim Blvd.
Anaheim, CA 92805

sent via email: skim@anaheim.net

Subject: Draft Environmental Impact Report for the Ball Road Basin General Plan Amendment and Zone Change in the City of Anaheim

Dear Ms. Kim:

Thank you for providing the City of Orange (City) with the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for the Ball Road Basin General Plan Amendment and Zone Change in the City of Anaheim. The project site is located on several parcels at the intersection of Ball Road and Phoenix Club Drive. The project proposes to amend the City of Anaheim’s General Plan (from Open Space to General Commercial) and Zoning Map (from Transitional and Industrial to General Commercial) to allow commercial development of Orange County Water District’s (OCWD) Ball Road Basin. In addition, the project would amend the General Plan Circulation and Green Elements to add a Planned Class 1 Bike Path/Trail Study Area along the northern, eastern and southern edges of Ball Road Basin.

The project site is located less than 0.1 miles west of the City of Orange along Santa Ana River. Due to the site’s proximity to Orange, the City has an interest in ensuring that the EIR addresses potential adverse impacts to Orange residents and infrastructure. As such, we offer the following comment:

Aesthetics

The project would allow for the development of buildings up to 75 feet in height. On pages 69-70 of the Draft EIR, it concludes that, “maximum buildout of the Project site would be in keeping with the existing characteristics of the surrounding built environment.” However, besides the Honda Center, the surrounding uses, including directly across the Santa Ana River are one to three stories. The City requests clarification of how the proposed development would be consistent with surrounding uses.
The City appreciates the opportunity to comment on the Draft EIR and we look forward to reviewing the Final EIR upon completion. If you have any questions, please contact Ashley Brodkin, Associate Planner with the City of Orange, at (714) 744-7238 or at abrodkin@cityoforange.org.

Sincerely,

[Signature]

William R. Crouch, AICP, AIA, NCARB, LEED (AP)
Community Development Director

cc: Rick Otto, City Manager, City of Orange
    Anna Pehoushek, Assistant Community Development Director, City of Orange
Response to Comment Letter G – City of Orange

**G-1:** Summary of Project Description comment acknowledged. No further response is required.

**G-2:** The land uses immediately to the west of the Project Site across Phoenix Club Drive are zoned for General Commercial (C-G), which is consistent with the proposed zone for the Proposed Project. As such, these parcels are also allowed a maximum structural height of 75 feet per Anaheim Municipal Code 18.08.050. The uses located to the east across the Santa Ana River in the City of Orange are all a minimum of approximately 500 feet away from the Project Site and are industrial and commercial in nature. The general public would have limited access to viewpoints in Orange looking west towards the Project Site. Views from the Santa Ana River Trail looking towards the Project Site from Orange would be similar to the views of the Honda Center. Additionally, the eastern edge of the Project Site would include a Class I bike trail, which would be a visual amenity against the backdrop of commercial development, similar to the views from Anaheim to the east with the Santa Ana River Trail providing a visual amenity against the backdrop of commercial and industrial development in Orange. This would result in a less than significant impact and would not require mitigation.

**G-3:** The comment is acknowledged. No further response is required.
2.2.8 Comment Letter H – County of Orange, OC Public Works
July 23, 2018

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

**Subject:** Draft Environmental Impact Report (EIR) for the Ball Road Basin General Plan Amendment and Zone Change

Dear Ms. Kim:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Ball Road Basin General Plan Amendment and Zone Change. The County of Orange offers the following comments on behalf of Orange County Flood Control District (OCFCD) regarding hydrology and floodplain issues for your consideration.

1. Any future proposed change in land use for the development and any new improvements to local drainage facilities have the potential to deliver more flows and negatively impact OCFCD’s facilities. Any revisions will require appropriate analyses and mitigation of impacts at the time of implementation.  

2. Since the City of Anaheim (City) is responsible for land use planning and development within City limits, the City should review and approve all local hydrology and hydraulic analyses including the needed 100-year flood protection for proposed developments within the project area. Proposed flood protection measures should not worsen existing conditions or move flooding problems downstream or upstream of future proposed developments.

3. All changes in conditions or easements should be consistent with existing agreements, if any, between the OCFCD and the City of Anaheim/OCWD or will necessitate a new agreement.

4. Any work within OCFCD’s right-of-way will require encroachment permits from the County’s Property Permit Section. In addition, all work within OCFCD right-of-way should be performed in a manner that will not adversely impact OCFCD facilities.

5. In the event the proposed work alters, modifies, or occupies the Santa Ana River levee system, a Section 408 permit will need to be obtained from the US Army Corps of Engineers.
6. The City and the appropriate regulatory agencies should review the potential impacts, if any, to the sensitive habitat within the area.

7. The City should ensure the future work does not alter nor impact the hydrologic and hydraulic flow or capacities within the area, especially the drainage facilities that service the area, including, but not limited to the Santa Ana River.

If you have any questions regarding these comments, please contact either Penny Lew at (714) 647-3990 or Anna Brzezicki at (714) 647-3989 in OC Flood Programs/Hydrology & Floodplain Management or Cindy Salazar at (714) 667-8870 in OC Development Services.

Sincerely,

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

cc: Penny Lew, OC Flood Programs/Hydrology & Floodplain Management
    Anna Brzezicki, OC Flood Programs/Hydrology & Floodplain Management
Response to Comment Letter H – County of Orange, OC Public Works

H-1: The comment that future change in land use and new improvements to local drainage facilities have the potential to deliver more flows and negatively impact the Orange County Flood Control District facilities is acknowledged. Implementation of MMs HYDRO-1 through MM HYDRO-4 would ensure that potential impacts to OCFCD facilities would be analyzed and mitigated to a level of less than significant at the time of implementation of a specific project. No further response is required.

H-2: The comment regarding City review and approval of all local hydrology and hydraulic analysis including the need for 100-year flood protection is acknowledged. Implementation of MMs HYDRO-1 through MM HYDRO-4 would ensure that potential impacts to flooding would be analyzed and mitigated to a level of less than significant at the time of implementation of a specific project. No further response is required.

H-3: The comment regarding existing agreements or changes is acknowledged. No further response is required.

H-4: The comment regarding right-of-way encroachment permits is acknowledged. No further response is required.

H-5: The comment regarding a Section 408 permit is acknowledged. Implementation of MM NIO-2 would determine if a Section 408 permit would be required from the Army Corps of Engineers. No further response is required.

H-6: The comment regarding the City and appropriate regulatory agency review of potential impacts, if any, to the sensitive habitat within the area is acknowledged. Implementation of MMs BIO-1 through MM BIO-3 would ensure that potential impacts to biological resources would be less than significant. No further response is required.

H-7: The comment regarding potential impacts to hydrologic and hydraulic flow or capacities within the area is acknowledged. Implementation of MMs HYDRO-1 through MM HYDRO-4 would ensure that potential impacts to hydrologic and hydraulic flow or capacities would be analyzed and mitigated to a level of less than significant at the time of implementation of a specific project. No further response is required.

H-8: The comment is acknowledged. No further response is required.
2.2.9 Comment Letter I – California Cultural Resource Preservation Alliance, Inc.
July 30, 2018

Susan Kim  
City of Anaheim  
Planning Department

Re: Draft EIR for the Ball Road Basin General Plan Amendment & Zone Change

Dear Ms. Kim:

Thank you for the opportunity to review the above-mentioned project. We concur with the determination that there remains the possibility that buried archaeological resources may be encountered during construction. This is particularly possible if the present structures and parking features were constructed prior to the enactment of CEQA which would have required an inspection of the surface prior to any ground disturbance. Therefore, we also agree with the recommendations that in the event of the discovery of archaeological resources construction is stopped and a qualified archaeologist be retained to determine the significance and treatment of the resources. In the event human remains are discovered, we concur with the provisions for compliance with Section 7050.5 of the California Health and Safety Code.

Sincerely,

Patricia Martz, Ph.D.  
President
Response to Comment Letter I – California Cultural Resource Preservation Alliance, Inc.

A-1: The commenter concurs with the determinations in the DEIR regarding potential discovery of archaeological resources and/or human remains. No further response is required.
3. REVISIONS TO THE DRAFT EIR

This section contains revisions to the DEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors.

Changes are made with strikeout showing deletions and underline showing additions.

**Page 8:**

<table>
<thead>
<tr>
<th>IMPACT AIR-1: The Proposed Project would conflict with or obstruct implementation of the applicable air quality plan.</th>
<th>Potentially Significant</th>
<th>MM AIR-1: Prior to issuance of the grading permit, the Property Owner/Developer shall require in the construction bid documents that the construction contractor to use large off-road diesel equipment with a horsepower (hp) rating of 160 hp or higher that meets the U.S. EPA-Certified emission standard for Tier 3 off-road equipment or higher. Any model year 2006 or later off-road diesel equipment meets the Tier 3 standard. The construction contractor shall maintain on-site a list of construction equipment by type and model year that will be made available for inspection by the City during construction. MM AIR-1 shall not apply to any equipment that is utilized on the Project site that is licensed to operate on public roadways, such as water trucks.</th>
<th>Less Than Significant</th>
</tr>
</thead>
</table>

**Page 13:**

| IMPACT CUL-4: Construction of the Proposed Project would potentially impact unknown human remains within the Proposed Project site. | Potentially Significant | MM CUL-1 (see above) and MM CUL-3: In the event human remains are discovered, the Construction Contractor shall notify the County Coroner of the find immediately and no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98 (State of California 2006). If human remains are found during grading, all work in the immediate area (a radius of at least 100 feet) shall stop, and all parties shall follow all applicable state laws regarding human remains. If the remains are Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Section 5097.98, shall immediately notify those persons it believes to be the Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification being allowed access to the site | Less Than Significant |
and shall recommend preservation in place, reburial, or the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

| IMPACT HAZ-2: The Proposed Project would create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment. | Potentially Significant | MM HAZ-1: Prior to issuance of a grading permit, the Property Owner/Developer shall prepare a Phase II Environmental Site Assessment conducted under the oversight of the Department of Toxic Substance Control, RWQCB, or the Orange County Health Care Agency and submit it to the Anaheim Planning and Building Department for review. The Phase II ESA shall include soil and soil vapor sampling to assess the Project site for potential contaminants, including, but not limited to, petroleum hydrocarbons, VOCs, semi-volatile organic compounds (SVOCs), heavy metals, polychlorinated biphenyls (PCBs), and pesticides. A Phase II sampling plan shall consider the geotechnical requirements to prepare potentially contaminated site soils for development of the Project site and shall also consider the thickness of soils and soil types that will be imported to the Project site to achieve final grade. These factors will affect the potential for exposure to potentially contaminated soils during earthwork activities and the post-development potential for indoor air exposure to potentially contaminated soil vapor. Additionally, a sampling plan shall be prepared and implemented prior to importing soil to the Project site for infill purposes in order to verify that imported soils will meet regulatory screening levels for commercial property use. | Less Than Significant |

City of Anaheim/Orange County Water District
Environmental Advisors, LLC
**MM HAZ-3:** Prior to issuance of a grading permit, the Property Owner/Developer shall abandon the existing groundwater monitoring well in accordance with applicable City and OCWD requirements. A Well Destruction Permit shall be obtained from the Environmental Services Division of the Anaheim Public Utilities Department (APUD). Any other wells discovered during grading or demolition shall also be destroyed under a revised Well Destruction Permit. Proof of proper abandonment shall be submitted to the APUD.

**MM HAZ-4:** Prior to the issuance of grading permits, the Property Owner/Developer shall include a note on the plans that in the event contamination of soil and/or groundwater is suspected, the Construction Contractor shall cease construction/demolition in the area and contact the City of Anaheim Public Works Department. The Property Owner/Developer shall perform soil/groundwater sampling with regulatory oversight by the appropriate government agency, i.e., the DTSC and/or RWQCB and obtain a Letter of No Further Action prior to resuming construction/demolition activities.

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**Page 91:**

**Impact Summary**

Mitigation measure **MM AIR-1** requires that prior to issuance of the grading permit, the Property Owner/Developer shall require in the construction bid documents that the construction contractor to use large off-road diesel equipment with a horsepower (hp) rating of 160 50 hp or higher that meets the U.S. EPA-Certified emission standard for Tier 3 4 off-road equipment or higher. Any model year 2006 or later off-road diesel equipment meets the tier 3 standard. The construction contractor shall maintain on-site a list of construction equipment by type and model year that will be made available for inspection by the City during construction. MM AIR-1 shall not apply to any equipment that is utilized on the Project site that is licensed to operate on public roadways, such as water trucks.
Table 3.2-6 Construction-Related Criteria Pollutant Emissions

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<th>Activity</th>
<th>VOC</th>
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<th>SO2</th>
<th>PM10</th>
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Exceeds Threshold? No  No  Yes  No  No  No  No

1 On-site emissions from equipment not operated on public roads.
2 Off-site emissions from vehicles operating on public roads.
Source: CalEEMod Version 2011.1.1-2016.3.1

Page 93:
Mitigation measure **MM AIR-1** requires that prior to issuance of the grading permit, the Property Owner/Developer shall require in the construction bid documents that the construction contractor use large off-road diesel equipment with a horsepower (hp) rating of 50 hp or higher that meets the U.S. EPA-Certified emission standard for Tier 3 or higher. Any model year 2006 or later off-road diesel equipment meets the Tier 3 standard. The construction contractor shall maintain on-site a list of construction equipment by type and model year that will be made available for inspection by the City during construction. MM AIR-1 shall not apply to any equipment that is utilized on the Project site that is licensed to operate on public roadways, such as water trucks. Table 3.2-7 shows that with application of mitigation measure **MM AIR-1**, the construction-related criteria pollutant emissions would be reduced to less than significant.
Page 97:
**Impact Summary**

Mitigation measure **MM AIR-1** requires that prior to issuance of the grading permit, the Property Owner/Developer shall require in the construction bid documents that the construction contractor use large off-road diesel equipment with a horsepower (hp) rating of 160 50 hp or higher that meets the U.S. EPA-Certified emission standard for Tier 3 4 off-road equipment or higher. Any model year 2006 or later off-road diesel equipment meets the tier 3 standard. The construction contractor shall maintain on-site a list of construction equipment by type and model year that will be made available for inspection by the City during construction. MM AIR-1 shall not apply to any equipment that is utilized on the Project site that is licensed to operate on public roadways, such as water trucks.

Page 101:
**MITIGATION MEASURES**

**MM AIR-1**: Prior to issuance of the grading permit, the Property Owner/Developer shall require in the construction bid documents that the construction contractor use large off-road diesel equipment with a horsepower (hp) rating of 160 50 hp or higher that meets the U.S. EPA-Certified emission standard for Tier 3 4 off-road equipment or higher. Any model year 2006 or later off-road diesel equipment meets the tier 3 standard. The construction contractor shall maintain on-site a list of construction equipment by type and model year that will be made available for inspection by the City during construction. MM AIR-1 shall not apply to any equipment that is utilized on the Project site that is licensed to operate on public roadways, such as water trucks.

Page 139:
**MM CUL-3**: In the event human remains are discovered, the Construction Contractor shall notify the County Coroner of the find immediately and no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98 (State of California 2006). If human remains are found during grading, all work in the immediate area (a radius of at least 100 feet) shall stop, and all parties shall follow all applicable state laws regarding human remains. If the remains are Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Section 5097.98, shall immediately notify those persons it believes to be the Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification being allowed access to the site and shall recommend preservation in place, reburial, or the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Page 180:
The potential for exposure to contaminated soils/groundwater would be mitigated by the implementation of mitigation measures **MM HAZ-1** through **MM HAZ-3 4**, which requires the preparation of a Phase II ESA for the Project, a review of the DOGGR records, and the
abandonment of the groundwater monitoring well, and handling suspected contamination, would reduce potential impacts from contaminated soils/groundwater to less than significant.

Page 181-182:

**MM HAZ-4:** Prior to the issuance of grading permits, the Property Owner/Developer shall include a note on the plans that in the event contamination of soil and/or groundwater is suspected, the Construction Contractor shall cease construction/demolition in the area and contact the City of Anaheim Public Works Department. The Property Owner/Developer shall perform soil/groundwater sampling with regulatory oversight by the appropriate government agency, i.e. the DTSC and/or RWQCB and obtain a Letter of No Further Action prior to resuming construction/demolition activities.

**LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Mitigation measures **MM HAZ-1 through MM HAZ-3 4** would reduce potential impacts from the contaminated soils due to the jet fuel release, and CSD stormwater run-off, and suspected groundwater and/or soil contamination to less than significant with mitigation.