SANTA ANA OFF-PREMISES COMMERCIAL ADVERTISING SIGNS ORDINANCE UPDATE PROJECT

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

Prepared By

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Prepared For

City of Santa Ana
Planning and Building Agency
20 Civic Center Plaza
Santa Ana, California 92702

March 2022

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Santa Ana Off-Premises Commercial Advertising Signs Ordinance Update Project

Initial Study and Mitigated Negative Declaration

Prepared for	City of Santa Ana 20 Civic Center Plaza, Santa Ana, California 92701
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ACRONYMS, ABBREVIATIONS, AND DEFINITIONS

Acronym	Acronym and Abbreviation Description
A	
AB	Assembly Bill
ADT	average daily traffic
a.m.	morning (before noon)
AQMP	Air Quality Management Plan
C	
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act of 1970
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	Carbon Dioxide Equivalent
CUP	Conditional Use Permit
cy	cubic yard
D	
DTSC	Department of Toxic Substances Control, State of California
E	
e.g.	for example
EO	Executive Order
F	
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHWA	Federal Highways Administration (U.S. Department of Transportation)
G	
GHG	greenhouse gas
GWP	global warming potential
H	
HFCs	hydrofluorocarbons
HVAC	heating, ventilating, and air conditioning

Acronym	Acronym and Abbreviation Description
I	
I-	Interstate
IS	Initial Study (CEQA)
L	
LST	Localized significance threshold
M	
MM	Mitigation Measure
$MMTCO_2e$	Million Metric Ton Carbon Dioxide Equivalent
MND	Mitigated Negative Declaration (CEQA)
$MTCO_2e/yr$	Metric Ton of Carbon Dioxide Equivalent per year
MWh	Megawatt-hour
N	
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Communities Conservation Plan
ND	Negative Declaration (CEQA)
NO_2	nitrogen dioxide
NOx	oxides of nitrogen (nitric oxide and nitrogen dioxide)
NOI	Notice of Intent
O	
O_3	ozone
OCFA	Orange County Fire Authority
P	
PRC	Public Resources Code
PFCs	perfluorocarbons
p.m.	evening (after noon)
PM2.5	respirable particulate matter less than 2.5 micrometers in diameter
PM10	respirable particulate matter less than 10 micrometers in diameter
ppm	parts per million
S	
SAUSD	Santa Ana Unified School District
SB	Senate Bill
SC	Standard Conditions and Requirements
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCAQMP	South Coast Air Quality Management Plan
SCE	Southern California Edison
sf	square foot (or feet)

Acronym	Acronym and Abbreviation Description
SO_2	sulfur dioxide
SO_4	sulfates
SR	State Route
T	
TAC	toxic air contaminant
U	
USFWS	U.S. Fish and Wildlife Service

Adjacent, when used to refer to a billboard adjacent to a freeway, shall mean located within 300 feet of the edge of pavement of a freeway on a parcel having frontage on said freeway and as depicted on maps by the Planning Division.

Arterial Billboard means an off-premise commerical advertising sign located adjacent to a public street that is not freeway oriented.

Billboard and *Off-Premise Commercial Advertising Sign* mean a sign affixed to the ground as a permanent structure used for the display of off-premise advertising to the public.

Billboard Operating Agreement means an agreement entered into by and between the City and the billboard operator which will specify terms for fees to compensate for impacts on City aesthetics and services, including an Economic and Community Benefits Plan, if proposed.

Classified Landscaped Freeway, when referenced in this Article, refers to a designation applied by the California Department of Transportation (Caltrans) to certain freeway segments which meet the criteria established by the California Code of Regulations Outdoor Advertising Regulations, Title 4, Division 6, and as amended.

Commercial Advertisement means any advertisement which has, as its primary purpose, the promotion of the sale of goods or services by a commercial business or enterprise to the public generally or any significant part thereof.

Digital Billboard means a billboard or off-premise commercial advertising sign using technologies, such as LCD (Liquid Crystal Display) and LED (Light-Emitting Diode), to display images and text.

Freeway Corridor means land located within 300 feet of the edge of freeway pavement and having frontage on the following freeways: the Santa Ana (I-5) Freeway; the Garden Grove (SR-22) Freeway, and the Costa Mesa (SR-55) Freeway.

Freeway-Oriented means any billboard that is adjacent to a freeway, designed to be viewed primarily by persons traveling on the main-traveled way of the freeway.

Freeway-Oriented On-Premise Digital Sign (Existing) means an electronic, digital message display that has been approved by the City of Santa Ana as a part of a regional planned sign program pursuant to Section 41-885 of the Santa Ana Municipal Code.

Non-Commercial Advertisement Sign means any advertisement other than a commercial advertisement, including public service announcements.

Off-premise Advertisement Sign means any commercial advertisement other than an on-premise advertisement sign that advertises products or services that are not located, produced, or offered for sale on the subject premise.

On-Premise Advertisement Sign means any commercial advertisement which pertains solely to goods or services which are produced or offered for sale on the premises where the advertisement is displayed.

Static Billboard means a billboard or off-premise commercial advertising sign that is not equipped as a digital display.

1 INTRODUCTION

1.1 Purpose and Scope of the Initial Study

In accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §21000 et seq.), the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.), and the City of Santa Ana Local Guidelines for Implementing the California Environmental Quality Act (Santa Ana, 2019), this Initial Study has been prepared to evaluate the potential environmental effects associated with the future construction and operation of digital billboards as set forth in the proposed Santa Ana Off-Premises Commercial Advertising Signs (Billboards) Ordinance Update Project (hereinafter referred to as the "proposed project" or "project"). This Initial Study includes a description of the proposed project; an evaluation of the project's potential environmental impacts; the findings of the environmental analyses; and recommended standard conditions and mitigation measures to lessen or avoid the project's significant adverse impacts on the environment.

Pursuant to Section 15367 of the State CEQA Guidelines, the City of Santa Ana (City) is the Lead Agency for the project. The Lead Agency is the public agency that has the principal responsibility for carrying out or approving a project. The City has the authority for environmental review in accordance with CEQA and certification of the environmental documentation.

This Initial Study evaluates each of the environmental issue areas contained in the checklist provided in Section 3. It provides decision-makers and the public with information concerning the potential environmental effects associated with the implementation of the proposed project, and potential ways to reduce or avoid possible environmental impacts. This Initial Study is intended to be used as a decision-making tool for the City in considering and taking action on the proposed project. Any responsible agency may elect to use this environmental analysis for discretionary actions associated with the implementation of the project.

1.2 Summary of Findings

As set forth in the State CEQA Guidelines Section 15070, an Initial Study leading to a Mitigated Negative Declaration (IS/MND) can be prepared when the Initial Study identifies potentially significant environmental impacts but revisions are made to the project, prior to public review of the Initial Study, that would avoid or mitigate the impacts to a level considered less than significant; and there is no substantial evidence in light of the whole record before the public agency that the project may have a significant effect on the environment.

Based on the environmental checklist form completed for the proposed project and supporting environmental analysis, the project would have no impact or a less than significant impact on the following environmental issue areas: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire. The proposed project's impacts on the following issue areas would be less than significant with the implementation of mitigation: Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Tribal Cultural Resources. All impacts would be less than significant after mitigation.

1.3 Initial Study Public Review Process

The Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration has been provided to the County of Orange Clerk-Recorder and distributed to responsible agencies, property owners, and others parties who expressed interest in being notified. A 30-day public review period has been established for the IS/MND in accordance with Section 15073(a) of the State CEQA Guidelines. During the public review period, the IS/MND, including the technical appendices, can be accessed on the City's website and is available for review at the locations identified below.

https://www.santa-ana.org/billboard-ordinance-update

City of Santa Ana
Planning and Building Agency
20 Civic Center Plaza
Santa Ana, California 92701
(714) 667-2700

In reviewing the IS/MND, affected public agencies and interested members of the public should focus on the adequacy of the document in identifying and analyzing the potential environmental impacts and the ways in which the potentially significant effects of the project can be avoided or mitigated. Comments on the IS/MND and the analysis contained herein may be sent to:

Ali Pezeshkpour, AICP, Principal Planner
City of Santa Ana
Planning and Building Agency, Planning Division
20 Civic Center Plaza
Santa Ana, CA 92702
(714) 647-5882

Written comments may also be sent via email to APezeshkpour@santa-ana.org. Comments sent via email should include the project title in the subject line and a valid mailing address in the email.

Following receipt and evaluation of comments from agencies, organizations, and individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation may be required. If not or if the issues raised do not provide substantial evidence that the project will have a significant effect on the environment, the IS/MND and the project will be considered for adoption and approval, respectively.

1.4 Report Organization

This document has been organized into the following sections:

Section 1 – Introduction. This section provides an introduction and overview describing the conclusions of the Initial Study.

Section 2 – Project Description. This section identifies key project characteristics and includes a list of anticipated discretionary actions.

Section 3 – Initial Study Checklist. The Environmental Checklist Form provides an overview of the potential impacts that may or may not result from project implementation.

Section 4 – Environmental Evaluation. This section contains an analysis of environmental impacts identified in the environmental checklist.

Section 5 – Preparers and Contributors. This section identifies parties involved in the preparation of the Initial Study.

Section 6 – References. The section identifies resources used to prepare the Initial Study.

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2 PROJECT DESCRIPTION

2.1 Background

The Federal Highway Beautification Act of 1965 (23 U.S.C. 131) governs advertising signage located along the interstate highway system (I-5 is an Interstate Highway). The Act is enforced by the Federal Highway Administration (FHWA), and as part of its enforcement effort, the FHWA has entered into agreements regarding the Act with state departments of transportation, including the California Department of Transportation (Caltrans). The FHWA and Caltrans entered into two agreements in 1965 and 1968, both of which state that the State of California would control the construction of all outdoor advertising signs, displays, and devices within 660 feet of an interstate right-of-way. The agreements stipulate that signs shall only be allowed in commercial or industrial zones and adhere to the following regulations:

- No signs shall imitate or resemble any official traffic sign, signal or device, nor shall signs obstruct or interfere with official signs;
- No signs shall be erected on rocks or other natural features;
- Signs [faces] shall be no larger than 25 feet in height and 60 feet in width, excluding border, trim, and supports;
- Signs located on the same side of the freeway must be separated by at least 500 feet; and,
- Signs shall not include flashing, intermittent or moving lights, and shall not emit light that may obstruct or impair the vision of any driver.

The State regulates outdoor advertising under the Outdoor Advertising Act (Business and Professions Code, §§5200 et. seq.), inclusive of State highways. As summarized, the Outdoor Advertising Act contains provisions related to the construction and operation of digital and static signs including the following:

- The sign must be constructed to withstand a wind pressure of 20 pounds per square feet of exposed surface (§5401);
- No sign shall display or cause or permit to be displayed upon any advertising structure or sign, any statements or words of an obscene, indecent or immoral character, or any picture or illustration of any human figure in such detail as to offend public morals or decency, or any other matter or thing of an obscene, indecent or immoral character (§5402);
- No digital sign shall display flashing, intermittent, or moving light or lights (§5403[h]);
- Signs are restricted from areas within 300 feet of an intersection of highways or of highway and railroad right-of-way lines (§5404(a)); and,
- Message center signs may not include any illumination or message change that is in motion or appears to be in motion or that change or expose a message for less than four seconds. No message center sign may be located within 500 feet of an existing billboard or 1,000 feet of another message center display, on the same side of the highway (§5405).

The California Vehicle Code Section 21466.5 prohibits the placing of any light source "...of any color of such brilliance as to impair the vision of drivers upon the highway." Specific standards for measuring light sources are identified in this section of the Vehicle Code. The restrictions may be enforced by Caltrans, the California Highway Patrol, or local authorities.

Off-premise displays (billboards) are prohibited by Caltrans within landscaped freeways. Caltrans has designated segments of I-5 and SR-55 in Santa Ana as a Landscaped Freeway. Landscaped freeway is defined as follows:

(a) Landscaped freeway means a section or sections of a freeway that is now, or hereafter may be, improved by the planting at least on one side or on the median of the freeway right–of–way of lawns, trees, shrubs, flowers, or other ornamental vegetation requiring reasonable maintenance.

(b) Planting for the purpose of soil erosion control, traffic safety requirements, including light screening, reduction of fire hazards, or traffic noise abatement, shall not change the character of a freeway to a landscaped freeway.

(c) Notwithstanding subdivision (a), if an agreement to relocate advertising displays from within one area of a city or county to an area adjacent to a freeway right-of-way has been entered into between a city or county and the owner of an advertising display, then a "landscaped freeway" shall not include the median of a freeway right–of–way.[1]

Caltrans enforces these laws and regulations throughout its outdoor advertising permitting process. As part of this process, applicants for new outdoor advertising signs must provide property owner consent for installation, verify zoning designation for proposed signs, and demonstrate compliance with local building requirements, in addition to other requirements.

2.2 Project Location and Setting

This Initial Study evaluates the potential environmental impacts associated with the implementation of the proposed Off-Premises Commercial Advertising Signs Ordinance (Billboards Ordinance) to amend the existing Santa Ana Municipal Code. The proposed project would apply to existing, entitled, and future billboards located within the City of Santa Ana, Orange County, California. The City of Santa Ana is bordered by the City of Garden Grove to the west, the City of Orange to the north, the cities of Tustin and Irvine to the east, and the City of Costa Mesa to the south. Regional access in Santa Ana is provided from State Route 55 (SR-55), Interstate 5 (I-5), and State Route 22 (SR-22). The project area is shown in a regional and local context on Exhibit 1, *Regional Vicinity Map* and Exhibit 2*, Site Vicinity Map*, respectively. There are approximately 92 existing billboards within the City limits, as depicted in Exhibit 3, *Existing Billboards in Santa Ana*.

2.3 Project Characteristics

This Initial Study evaluates the environmental impacts associated with the adoption and implementation of the Billboards Ordinance as a part of the City's Municipal Code to allow for digital billboards adjacent to freeway frontages. The Billboards Ordinance establishes permitted locations for billboards and billboard sign standards, and amends Chapter 41 Article XII of the Santa Ana Municipal Code.

The proposed Billboards Ordinance identifies the purpose and intent of the project is, as summarized below:

> …to allow digital billboards to be installed adjacent to freeways in suitable locations; to allow the reconstruction or conversion of existing static freeway-oriented billboards to digital displays; and to allow the reconstruction or conversion of existing on-premise

[1] California Department of Transportation. Outdoor Advertising Act, Business and Professions Code. Section 5216 Landscaped Freeway.

freeway-oriented advertising signs to digital billboards. These provisions seek to achieve the following goals:

- The removal of existing billboards along arterials;
- The construction of new freeway-oriented digital billboards in exchange for specific economic and community upgrades;
- The reconstruction/conversion of freeway-oriented existing static billboards in exchange for specific economic and community benefits;
- The reconstruction or conversion of existing on-premise freeway-oriented digital signs to off-premise commercial advertising signs;
- The display of public service announcements; and
- The generation of revenue to the City to fund ongoing services and community needs.

The size, number, location and illumination of billboards can have significant influence on the City's visual environment. Without adequate control, billboards can create or contribute to blight and have therefore historically been prohibited in the City. However, technological innovations in the billboard industry have improved the appearance and potential community benefits of such signs. The introduction of new and conversion of existing billboards in specified locations adjacent to freeways can also facilitate the removal of existing billboards on arterials, thus improving the visual appearance of thoroughfares and neighborhoods within the City.

The approval of any application to (1) construct a new freeway-oriented digital billboard; (2) convert/reconstruct an existing freeway-oriented static billboard to a digital billboard; (3) convert/reconstruct an existing freeway-oriented on-premise sign to a digital billboard; or, (4) relocate an existing static or digital billboard shall be subject to execution of a Billboard Operating Agreement. The Billboard Operating Agreement shall be a legally binding written agreement between the billboard operator and the City, executed by the City Manager, or his or her designee, and in a form and substance satisfactory to the Executive Director of Planning and Building and the City Attorney, and containing those provisions necessary to ensure that the requirements of the Billboard Operating Agreement are satisfied.

The complete text of the draft Billboards Ordinance is provided as Appendix A to this Initial Study. Table 1: *Billboard Permits and Review Authority,* summarizes the regulations for the various types of billboards.

Table 1. Billboard Permits and Review Authority

Billboard Type	Required Permit	Approving Body	Public Hearing?
New Digital Billboard	Development Project Plan	Director of Planning and Building Agency	Yes
	Conditional Use Permit	Planning Commission	
	Operating Agreement	City Manager	
Conversion/Reconstruction of Existing Freeway-Oriented Static Billboard	Development Project Plan	Director of Planning and Building Agency	No
	Operating Agreement	City Manager	
Conversion/Reconstruction of Existing Freeway-Oriented On-Premise Sign	Development Project Plan	Director of Planning and Building Agency	Yes
	Conditional Use Permit	Planning Commission	
	Operating Agreement	City Manager	
Relocation of Existing Static or Digital Billboards[1]	Development Project Plan	Director of Planning and Building Agency	Yes
	Conditional Use Permit	Planning Commission	
	Operating Agreement	City Manager	

1. If required and permitted by the California Outdoor Advertising Act, as amended from time to time.
Source: Draft Off-Premises Commercial Advertising Signs Ordinance, 2022.

The project does not propose any specific new signs or digital conversion of existing billboard faces. Rather, the proposed project provides regulations where new digital billboards would be allowed. The proposed code amendments would allow freeway-adjacent digital display billboards in commercial and industrial zones, upon approval of a Conditional Use Permit (CUP), and subject to the reasonable restrictions and criteria intended to ensure the public health and safety concerning the location, distance from residential uses, height, size, design, orientation, brightness, and display cycle of such signs. Relocation of existing billboards would also require a CUP. Conversions of existing static billboards to digital would only require ministerial review.

New, digital display billboards would be permitted only in identified allowable areas, referred herein as the Potential Billboard Areas. An applicant would need to provide the City with proof of lease, easement, or any other entitlement demonstrating the right to install the billboard on the subject property. The applicant would also need written consent from the property owner.

Potential Billboard Areas

Because of the linear nature of the project area along three freeways, for the purpose of this Initial Study, the City was separated into six Potential Billboard Areas. Where there are discontiguous locations within a Potential Billboard Area, the area is further divided into segments. Potential billboard areas are located along freeway frontages; within 300 feet of the edge of the freeway pavement, and only include areas zoned and used for non-residential uses (including overlay zones, specific plans, and specific development zones). As proposed, the Billboards Ordinance would prohibit any billboards within 500 feet of a residentially zoned property, as measured from the border of the digital billboard face or the base of the digital billboard structure, to the nearest property line of the residentially zoned property. As previously noted, Caltrans also prohibits outdoor advertising (billboards) within designated landscape freeway corridors and within any right-of-way owned by Caltrans.

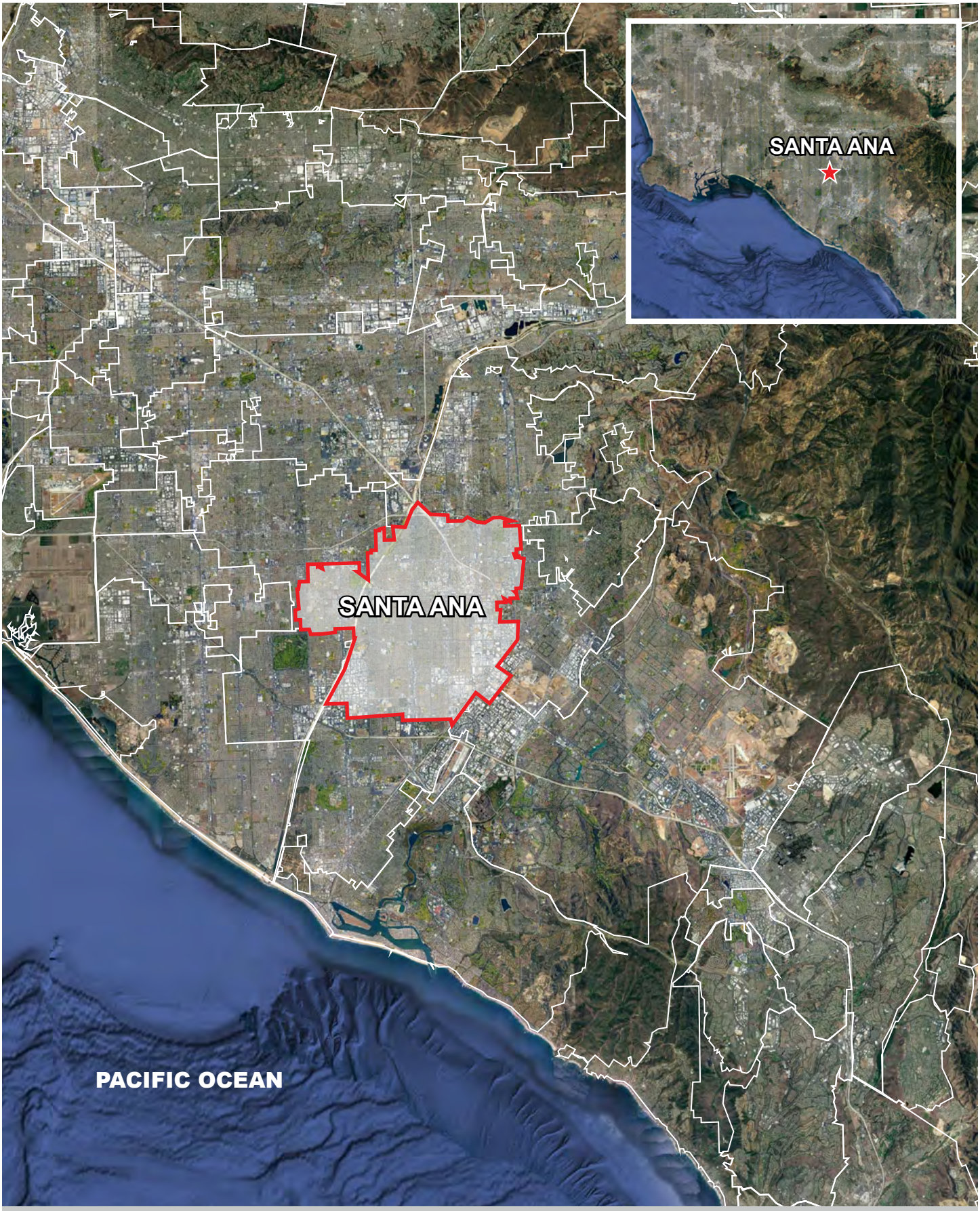

Exhibit 1: Regional Vicinity Map
Billboards Ordinance Update Project

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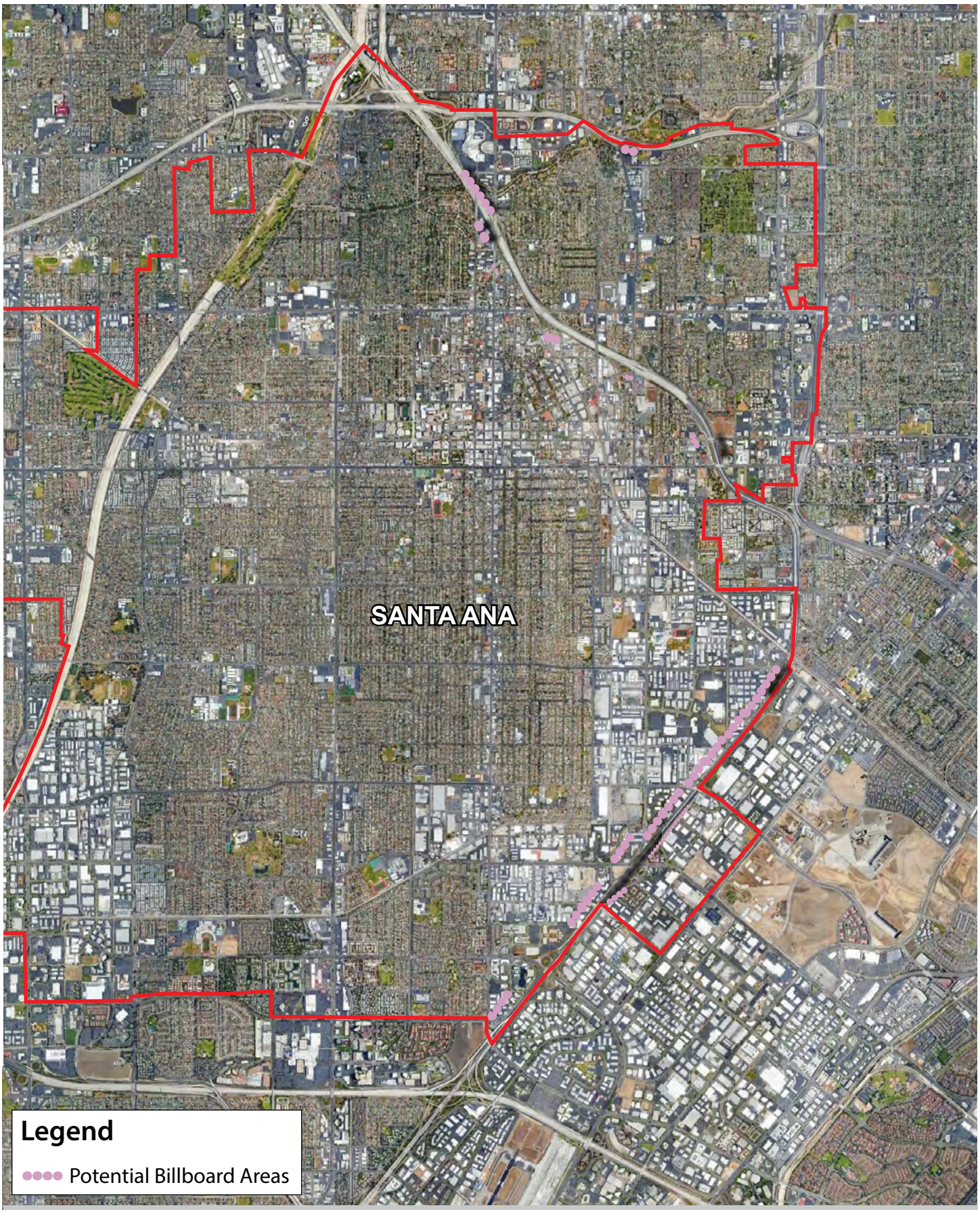

Exhibit 2: Site Vicinity Map
Billboards Ordinance Update Project

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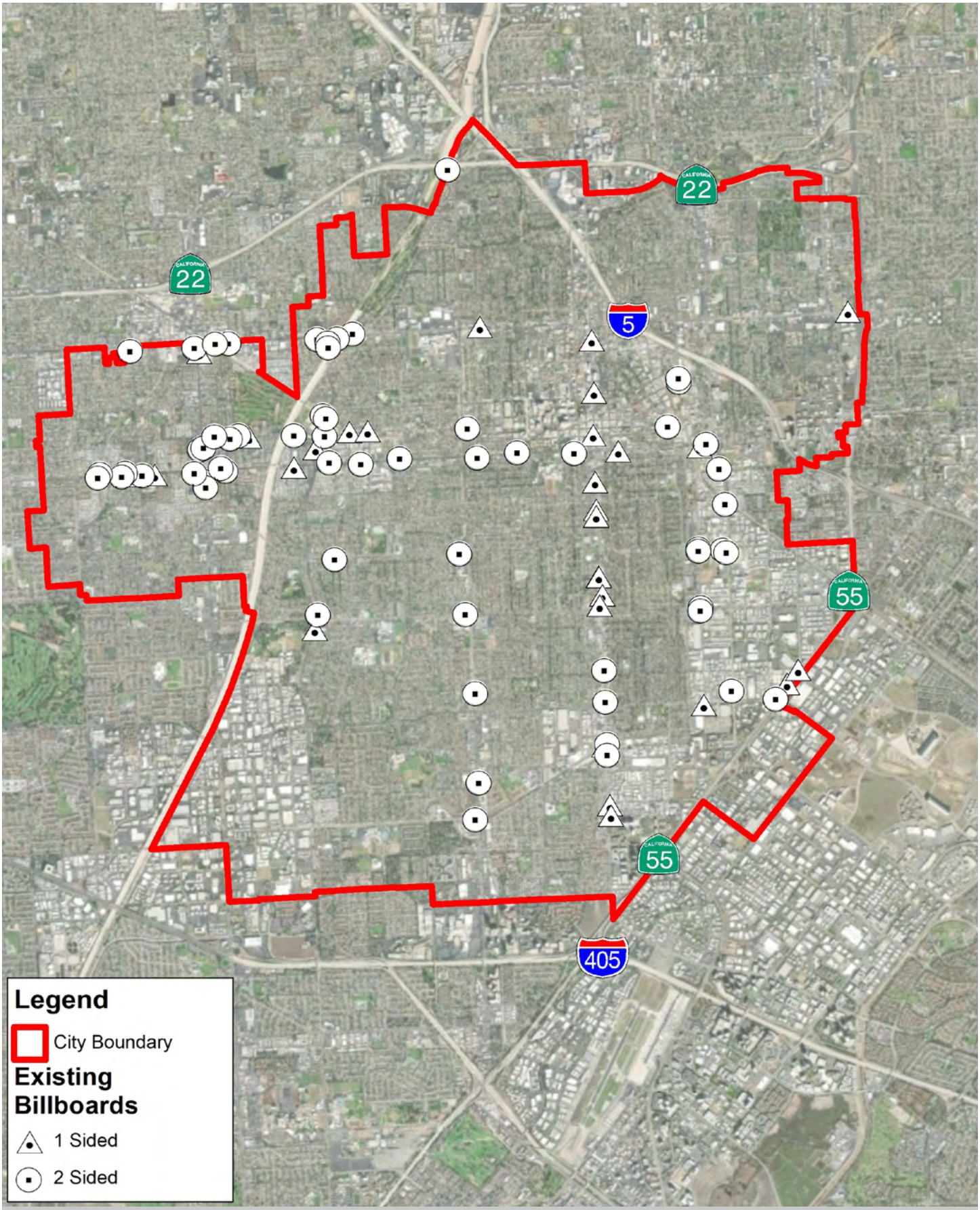

Exhibit 3: Existing Billboards in Santa Ana
Billboards Ordinance Update Project

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The Potential Billboard Areas are depicted in Exhibit 4 through Exhibit 9, *Potential Billboard Areas 1-6.* Only those areas shown in purple on the exhibits are the areas where billboards may be sited. A description of each area and location are provided in Table 2: *Potential Billboard Areas*, and the following narrative.

Table 2. Potential Billboard Areas

Potential Billboard Area	Segment	Description of Location
1	1	South of SR-22, Grand Ave., within Bishop Village Center located at 2739 N. Grand Ave.
2	2	Parking lot at 2800 N. Main St. Discovery Cube Orange County at 2500 N. Main St.
	3	Rancho Santiago Center 2323-2333 N. Broadway Commercial plaza at 2216 N. Main St.
	4	Industrial Park at Santiago St.
3	5	Industrial Park at Fruit St., east of Grand Ave., south of I-5
	6	1665 E 4th St., west of I-5
4	7	1505 Auto Mall Dr.
	8	Ritchey Centre Industrial Park 1727 Boyd St., 1929 E. St Andrew Pl. 1924 E. Glenwood Pl., 2019 Ritchey St., 2061 Ritchey St.
	9	2100 – 2200 Ritchey St.
	10	2237 Ritchey St., 2201 Ritchey St. *Existing Billboard*
5	11	Industrial Park bordered by E. Warner Ave. and Grand Ave., along southbound SR-55
	12	Industrial Business Park at Pullman St., along northbound SR-55
	13	Dyer Business Center at 800-810 E. Dyer Rd., 2911 Tech Center Dr.
6	14	Industrial Business Park near 2919 Tech Center Dr. and business complex near 3201 S. Standard Ave.
	15	Industrial complex at 302 E. Stevens Ave.; Avis Rental at 4101 S. Main St.

Potential Billboard Area 1 – Potential Billboard Area 1 is located near the eastbound onramp to SR-22 at Grand Avenue, near the jurisdictional boundary between the cities of Santa Ana and Orange (Exhibit 4). There are no billboards within Segment 1. Several commercial uses including a U.S. Bank, Civic Center Inn & Suites, and the Bishop Village commercial plaza are located in this general area.

Potential Billboard Area 2 – Potential Billboard Area 2 extends along I-5 for approximately 1.4 miles from North Broadway to Lincoln Avenue (Exhibit 5). There is a designated landscape freeway corridor along the frontage of MainPlace Mall. Within the limits of Potential Billboard Area 2, there are commercial land uses, including the Discovery Cube Orange County (Segment 2) and the Rancho Santiago Center Office Park (Segment 3). Residential land uses are present on both sides of the I-5. An industrial park near the Seventeenth Street southbound offramp (Segment 4) abuts the I-5 southbound frontage. The Santa Ana Water Tower, a City of Santa Ana designated landmark, is also located near the industrial park. Although the Water Tower is not located within Potential Billboard Area 2, it is visible from I-5.

Potential Billboard Area 3 – Potential Billboard Area 3 extends along I-5 for approximately 1.5 miles from Lincoln Avenue to North Golden Circle Drive, near the jurisdictional boundary between the cities of Santa

Ana and Tustin. There are residential land uses abutting the north side of I-5. The predominant uses on the south side of I-5 are light industrial and commercial (Segment 5). The Santa Ana Zoo and Xerox Center are also within Potential Billboard Area 3. Office parks and commercial areas are also present along First and Fourth Street (Segment 6).

Potential Billboard Area 4 – Potential Billboard Area 4 extends along SR-55 for approximately 1.1 miles between Edinger Avenue and Warner Avenue. Area 4 is adjacent to the City's boundary with the City of Tustin. Potential Billboard Area 4 contains multiple automotive dealerships, automotive-related uses, and industrial business parks (Segment 7). There are four existing billboards along southbound SR-55 within the Ritchey Centre industrial park (Segment 8). Specifically, a one-sided static billboard is located at 2100 Ritchey Street (Segment 9), two one-sided static billboards are located at 2140 Ritchey Street, and one two-sided static billboard is located at 2221 Ritchey Street (Segment 10).

Potential Billboard Area 5 – Potential Billboard Area 5 extends for approximately one mile along SR-55 between Warner Avenue and Alton Parkway, near the City's jurisdictional boundary with the City of Irvine. There is one static freeway billboard at 1700 E. Garry Avenue along northbound SR-55. Potential Billboard Area 5 is characterized by commercial office and light industrial parks uses on either side of SR-55 (Segment 11-13).

Potential Billboard Area 6 – Potential Billboard Area 6 extends along SR-55 for approximately one mile from Alton Parkway to Sunflower Avenue, near the City's boundary with the City of Costa Mesa. There are no existing billboards within Potential Billboard Area 6. Potential Billboard Area 6 is characterized by commercial and light industrial business parks off Standard Avenue (Segment 14), and an Avis Car Rental facility at 4101 South Main Street (Segment 15).

Additional Potential Billboard Areas could be considered in the future based on factors including but not limited to the following: Caltrans' declassification of segments of landscaped freeways; Caltrans modifications to regulations for digital billboards; and rezones of properties from residential to non-residential or changes to the City's Municipal Code definition of a residential use.

2.4 Existing Municipal Code and Proposed Amendments

The City of Santa Ana sign regulations for off-premise commercial advertising signs are currently codified in Chapter 41, Article XII of the Santa Ana Municipal Code. Santa Ana Municipal Code Article XII outlines billboard exclusions from residential areas, buffers from residential zones, signage height and size, and design restrictions. The proposed Billboards would amend the development standards and use regulations under Article XII. The key elements of the Ordinance are provided below.

A. Billboards shall only be constructed on properties zoned and used for non-residential uses in any zoning district, including overlay zones, specific plans, and specific development zones. Such requirement may be modified by the Planning Commission through the approval of a Conditional Use Permit.

B. Billboards shall be prohibited in the following locations:

    a. No billboard may be located within 500 feet of any residentially zoned parcel, as measured from the border of the digital billboard face, or the base of the digital billboard structure, to the nearest property line of the residentially zoned property. Such requirement may be modified to be no less than 150 feet for mixed-use districts by the Planning Commission through the approval of a CUP.

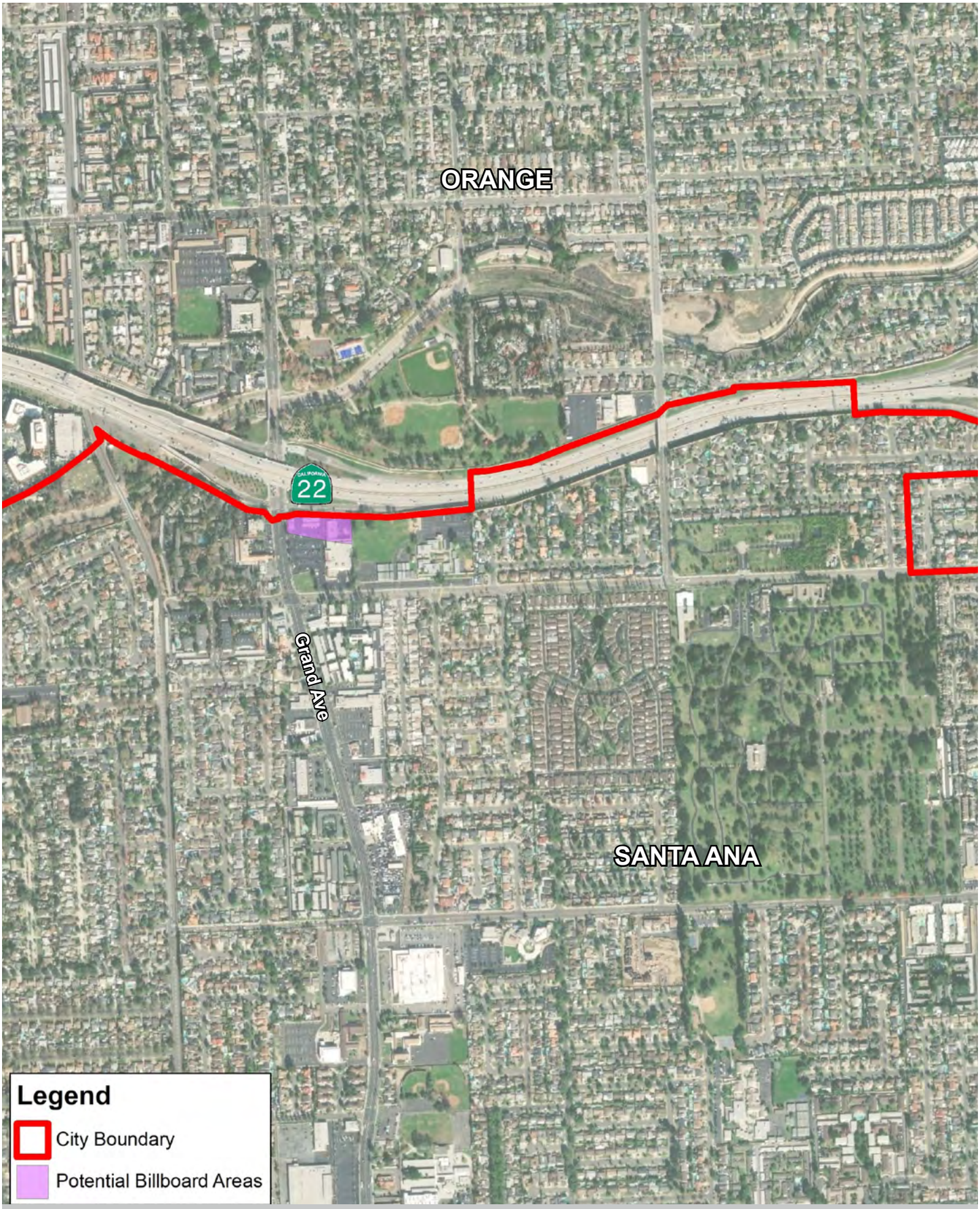

Exhibit 4: Potential Billboard Area 1
Billboards Ordinance Update Project

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Exhibit 5: Potential Billboard Area 2
Billboards Ordinance Update Project

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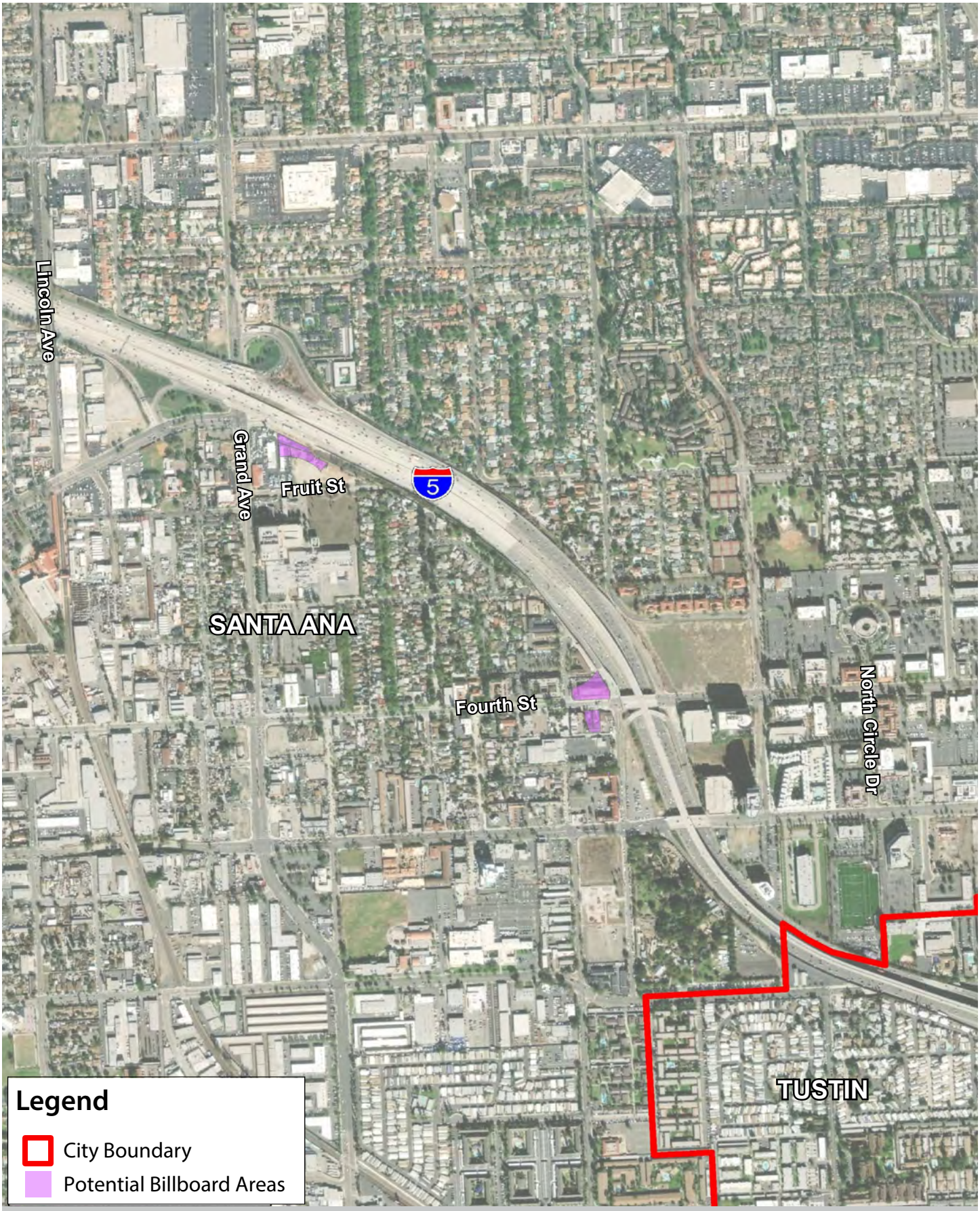

Exhibit 6: Potential Billboard Area 3
Billboards Ordinance Update Project

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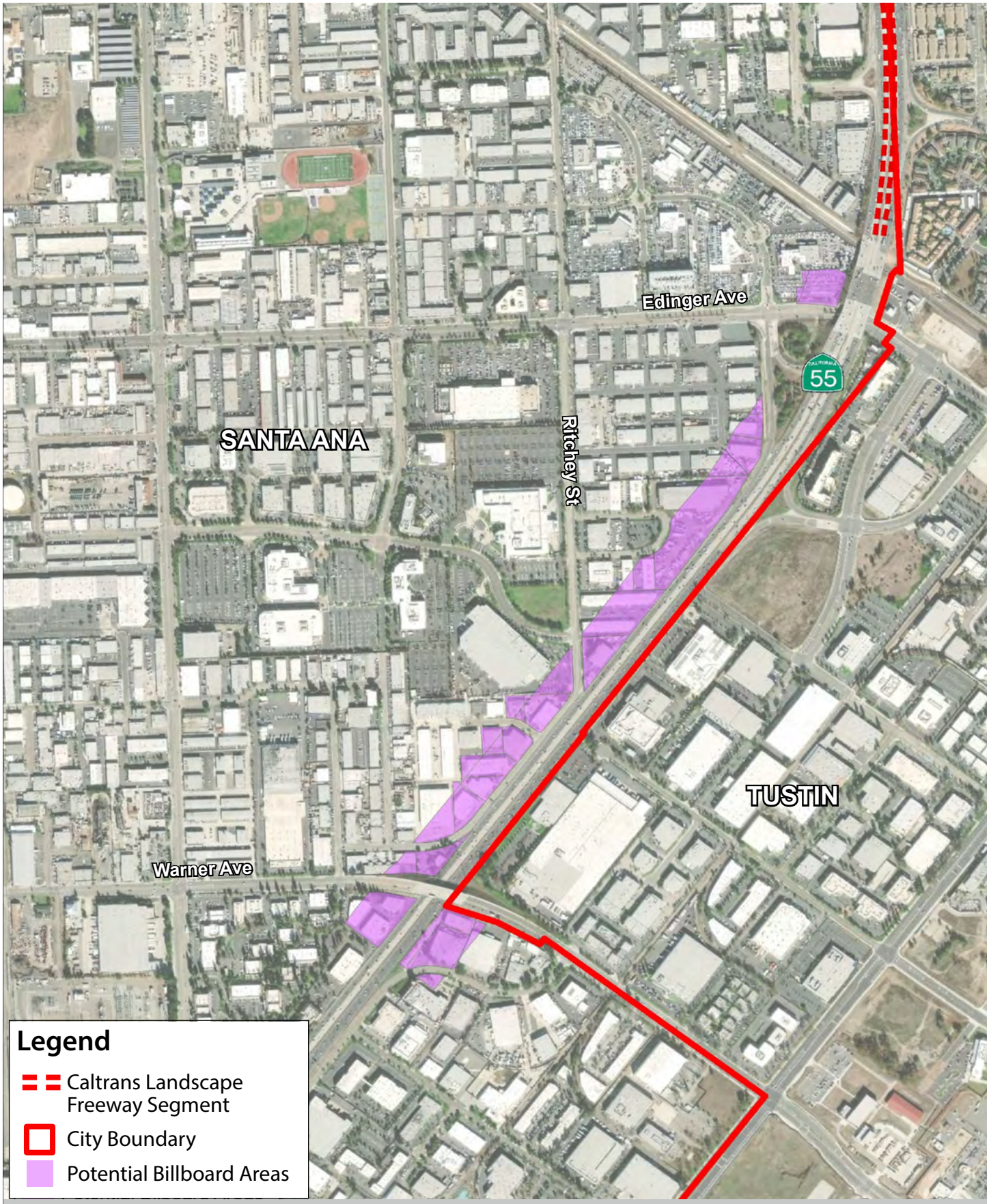

Exhibit 7: Potential Billboard Area 4
Billboards Ordinance Update Project

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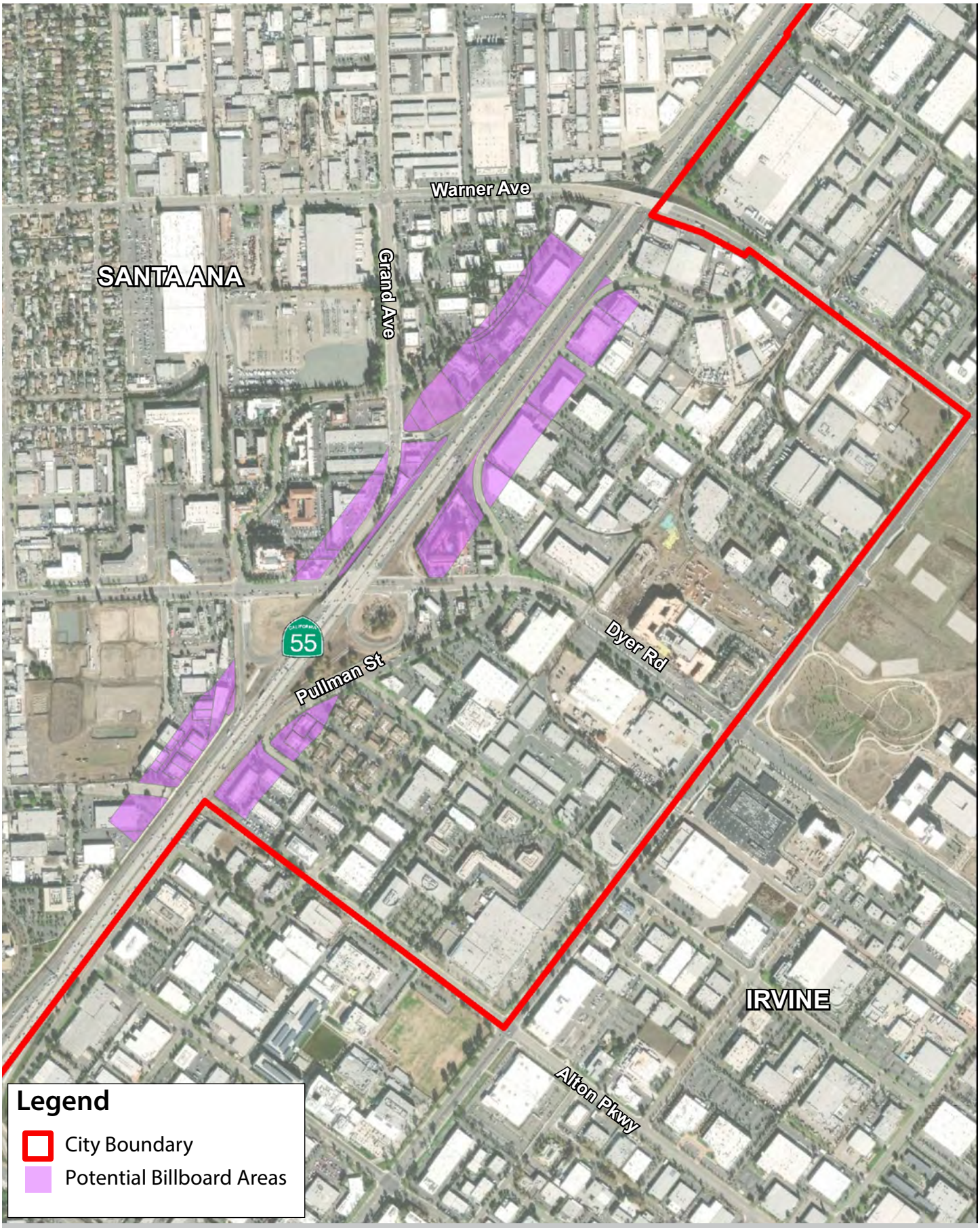

Exhibit 8: Potential Billboard Area 5
Billboards Ordinance Update Project

NOT TO SCALE

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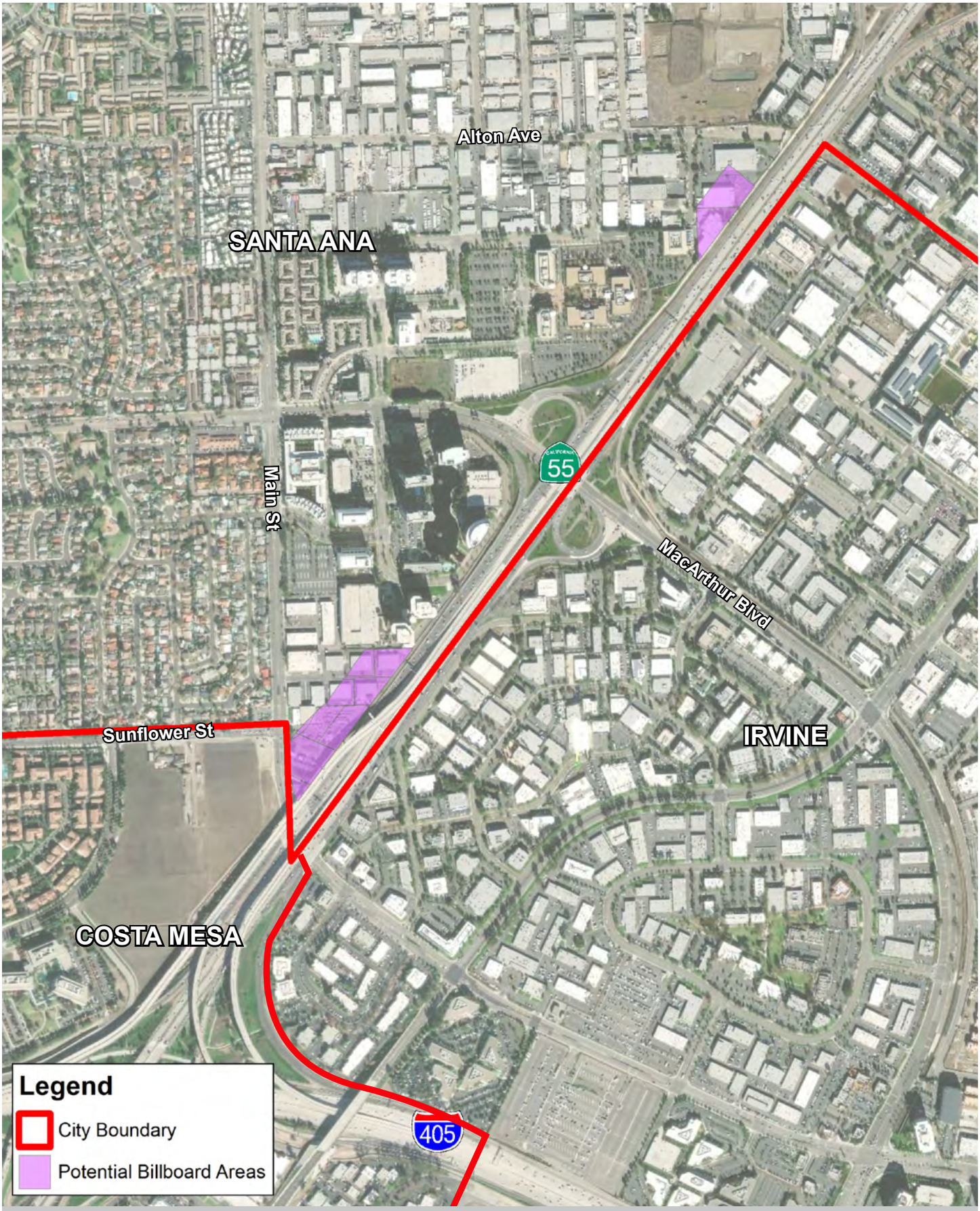

Exhibit 9: Potential Billboard Area 6
Billboards Ordinance Update Project

NOT TO SCALE

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b. No billboard may be located adjacent to any freeway segment designated as a "classified landscaped freeway" as defined in this Chapter.

c. No billboard may be located within any right of way owned by Caltrans.

d. No billboard may block or significantly impair views of any landmark identified in the General Plan.

Development Standards

All digital billboards must comply with standards established by Caltrans in effect at the time the permit is issued. These standards may prohibit the construction of digital billboards in landscaped areas and/or in zones where residential uses are permitted; may limit the size and height of digital billboards; and may require separation between billboards, among other provisions. All new or reconstructed billboards must be digital. The construction or reconstruction of static billboards is prohibited. Table 3: *Billboard Development Standards*, are applicable to all new and reconstructed billboards.

Table 3. Billboard Development Standards

	Standard
Maximum Sign Area/Face	As allowed by Caltrans
Maximum Number of Faces	2
Maximum Height	60 feet [1]
Spacing Between Billboards	1,000 feet [2]
Number of Vertical Supports	One Vertical Support [3]

1. Measured from nearest adjacent curb level on the site on which the sign is constructed. May be modified through Planning Commission approval of a Conditional Use Permit.
2. The minimum separation between billboards shall be 1,000 feet (including static billboards) or standards established by Caltrans in effect at the time the permit is issued, whichever is greater, as measured from the base of each billboard's vertical support.
3. All conduits, cables and appurtenances shall be concealed within the vertical support.

Design and Lighting Standards

As summarized below, design and lighting standards applicable to new and reconstructed billboards include the following:

- The words "Santa Ana" must permanently appear on the billboard structure in a size large enough to be visible to drivers using the freeway.
- All ground-mounted equipment must be screened from view at street level. The entire site occupied by the billboard must be landscaped with groundcover and shrubs.
- Each freeway billboard must be oriented primarily for viewing from the freeway, and be oriented and adequately shielded to prevent the trespass of light and glare upon any residential land use, including those in mixed-use districts, as exists on the date of building permit issuance.
- Signs may produce a maximum 0.3 foot-candles over ambient light levels. The display brightness must be controlled by a photocell or light sensor that adjusts the brightness to the required level based on ambient light conditions without the need for human input.
- Any sign area not comprising the digital display panel is prohibited. This area includes, but is not limited to, static sign area, appendages, cutout letters, and figures. A frame surrounding the display panel up to 12 inches in width is permitted.

- Where screen transitions are used, such transitions cannot give the appearance of moving text or images. The sign copy must not use flashing, intermittent or moving lights or produce the optical illusion of movement.
- Each sign copy must be displayed for a minimum of four seconds. The still images may not move or present the appearance of motion and may not use flashing, scintillating, blinking, or traveling lights or any other means not providing constant illumination. Transition or blank screen time between one still image and the next may not exceed one second.

Billboards shall not contain any of the following:

- Moving parts.
- Appendages, cut-out letters or figures that protrude beyond the flat surface of the sign face.
- Lights that flash, shimmer, glitter or give the appearance of flashing, shimmering or glittering. Exceptions to this restriction include time, temperature and smog index units.
- Walls or screens at the base of the sign which create a hazard to public safety or provide an attractive nuisance.
- Copy which simulates any traffic sign in a manner which confuses the public.
- Copy which duplicates any other content displayed on the sign.
- Devices which emit audible sound, or odor or particulate matter.

2.5 Billboard Construction Characteristics

Billboard construction and manufacturing would occur off-site and be delivered to the permitted billboard areas in the City for assembly and installation. Construction hours would adhere to the City of Santa Ana Noise restrictions set forth in Municipal Code Section 18-314. All construction activities would occur between the hours of 7 a.m. and 8 p.m. on weekdays, including Saturday. Construction activities are not permitted any time on Sundays or a federal holidays. The typical duration of a static or digital billboard installation occurs over a six-day period and includes the following activities assumed for this Initial Study analysis:

- **Day One:** The footings for the structure are completed. The estimated column depth for the billboard support is approximately 30 feet deep, with 5-foot diameter caissons. Installation of the footages is estimated to require the excavation and export of approximately 30.6 cubic yards of material. In addition to the drilling rig, the construction team would use a skip loader (bucket truck), dump truck for soil export, and a water truck as needed to water down dust. Any excavated areas are required to be fully covered.
- **Day Two:** The construction crew would first install the sign column and then pour the concrete. The crew uses a crane truck, a flatbed truck (to carry in the pre-fabricated columns), and a concrete truck. A fast-setting concrete is used, which would allow the concrete to cure overnight.
- **Day Three:** The construction crew would erect the sign supports and the signs. For this construction activity, a crane truck is used, and a flatbed truck is required to transport the superstructure and sign faces.
- **Day Four:** The electrical connections are installed.

- **Day Five:** The construction crew would finish any other necessary tasks to complete the structures and clean up the project site.
- **Day Six:** Any necessary landscaping repairs and improvements occur.

2.6 Discretionary and Ministerial Approvals

The discretionary and ministerial actions and/or approvals need to be considered for the proposed project include, but are not limited to, the following:

- **Adoption of the Initial Study/Mitigated Negative Declaration.** The proposed project requires CEQA compliance through the adoption of an IS/MND prior to approval of the project. This Initial Study and the proposed MND are intended to serve as the primary environmental document for all actions associated with the approval of the Santa Ana Billboard Project. In addition, this is the primary reference document for the formulation and implementation of a mitigation monitoring and reporting program for the proposed project.
- **Off-Premises Commercial Advertising Signs Ordinance Adoption.** The adoption of the Billboards Ordinance would amend Chapter 41 Article VII of the City of Santa Ana Municipal Code to allow digital billboards to be installed adjacent to freeways in suitable locations, the reconstruction or conversion of existing static freeway-oriented billboards to digital billboards; and the reconstruction or conversion of existing on-premise freeway-oriented advertising signs to digital billboards.

Individual requests for billboards would be further evaluated on a case-by-case basis under the City's permitting process. The following discretionary approvals are required for the installation of any future billboards:

- The approval of a Conditional Use Permit for billboard installation or relocation, except for the conversion or reconstruction of an existing freeway-oriented static billboard;
- The approval of an executed Operating Agreement between the applicant and City; and,
- The approval of a Building Permit for billboard installation or relocation.

Other permits required for any future billboard installation or relocation will include, but may not be limited to, building permits and permits for new utility connections. Other public agency approvals include the Department of Transportation Outdoor Advertising Act Permit from Caltrans.

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3 INITIAL STUDY CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. *No environmental factors would be result in a Potentially Significant Impact that would require the preparation of an Environmental Impact Report*.

- ☐ Aesthetics
- ☐ Air Quality
- ☐ Agricultural and Forestry Resources
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology/Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards and Hazardous Materials
- ☐ Hydrology/Water Quality
- ☐ Land Use/Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population/Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities/Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation (check one):

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CERTIFICATION:

Ali Pezeshkpour, AICP, City of Santa Ana

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ENVIRONMENTAL CHECKLIST

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:**				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
2.	**AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:**				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.	**AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:**				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐
4.	**BIOLOGICAL RESOURCES. Would the project:**				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c)	Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	where sewers are not available for the disposal of waste water?				
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
8.	**GREENHOUSE GAS EMISSIONS. Would the project:**				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
9.	**HAZARDS AND HAZARDOUS MATERIALS. Would the project:**				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
13. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
15. PUBLIC SERVICES. Would the project result in				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
v) Other public facilities?	☐	☐	☐	☒
16. RECREATION. Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
17. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☐	☒
18. TRIBAL CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in	☐	☒	☐	☐

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				
19.	**UTILITIES AND SERVICE SYSTEMS. Would the project:**				
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e)	Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
20.	**WILDFIRE. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:**				
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
21. MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

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4 ENVIRONMENTAL ANALYSIS

4.1 Aesthetics

Threshold (a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The Potential Billboard Areas and surrounding environments are relatively flat and have an urbanized character. Specifically, Potential Billboard Areas 1-3 have more residential land uses in the surrounding areas compared to Potential Billboard Areas 4-6. There are no designated scenic vistas in the City of Santa Ana. The Potential Billboard Areas do not have views of scenic vistas. Background views of the Santa Ana Mountains are partially and intermittently obscured by existing development along SR-22, I-5, and SR-55. Additionally, no visual resources such as topographic or scenic features are located in or proximate to the Potential Billboard Areas.

The Potential Billboard Areas in urbanized areas of the City, adjacent to SR-22, I-5, and SR-55. The Potential Billboard Areas are located along the freeway frontages and are within 300 feet of the edge of pavement of the freeway mainline[2] but outside of the freeway right-of-way. As proposed by the City of Santa Ana, no billboards would be permitted within 500 feet of a residentially zone property. As indicated in the draft Billboards Ordinance, billboards would not exceed a height of 60 feet measured from the nearest adjacent curb level on the site on which the sign is constructed. The sign area would be as mandated by Caltrans.

Although not specific to scenic vistas, the Urban Design Element General Plan Policy 6.2 identifies that development near an existing landmark must be supportive and respectful of the architecture, site, and other design features of the landmark. Further, General Plan Goal 6, Landmarks, aims to create new and protect existing City landmarks and memorable places that convey positive images. Urban Design Element defines a landmark a providing a point of reference that helps people to orient themselves within the City. The Santa Ana Water Tower (a Santa Ana historic landmark), located at 1524 Penn Way, is 153 feet in height; it is outside of Potential Billboard Area 2, Segment 4 but is visible from I-5.

Per the proposed Billboards Ordinance, applicants would need to provide findings that future billboards would not block views of landmarks as part of the CUP process. Development standards outlined in the Billboards Ordinance also restrict billboard heights to 60 feet. Views of major landmarks in the City would remain protected following compliance with General Plan Urban Design Element Goal 6, Policy 6.2, and development standards set forth in the Billboards Ordinance. Therefore, any future billboards would not substantially obscure views of the Santa Ana Mountains or major landmarks and as a result, the proposed project would result in less than significant impacts and no mitigation is required.

Threshold (b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. Caltrans manages the California Scenic Highway Program, which is intended to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. A highway may be designated as scenic based on certain criteria, including how much of the natural landscape can be seen by travelers, the landscape's scenic quality, and the extent to which development intrudes on the traveler's enjoyment of the view. There are no officially-designated State scenic highways proximate to the Potential Billboard Areas. The nearest designated State Scenic Highway is SR-91 between SR-55 and the eastern limits of the City of Anaheim, located approximately 4.95 miles

[2] When used to refer to a billboard adjacent to a freeway, shall mean located within 300 feet of the edge of pavement of a freeway on a parcel having frontage on said freeway and as depicted on maps by the Planning Division.

north of Potential Billboard Area 1.[3] The Potential Billboard Areas do not contain any scenic rock outcroppings, trees, or historic buildings listed on or eligible for the National Register of Historic Places or California Register of Historical Resources. Therefore, the proposed project would not affect scenic resources along an officially designed or an eligible scenic highway. No impacts would occur and no mitigation is required.

Threshold (c) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The proposed project also would not substantially degrade the existing visual character of the site or its surroundings. The proposed project would comply with the standards in the draft Billboards Ordinance that would be adopted as part of the project approvals.

Design and Lighting Standards

As summarized below, design and lighting standards applicable to new and reconstructed billboards include the following:

- The words "Santa Ana" must permanently appear on the billboard structure in a size large enough to be visible to drivers using the freeway.
- All ground-mounted equipment must be screened from view at street level. The entire site occupied by the billboard must be landscaped with groundcover and shrubs.
- Each freeway billboard must be oriented primarily for viewing from the freeway, and be oriented and adequately shielded to prevent the trespass of light and glare upon any residential land use, including those in mixed-use districts, as exists on the date of building permit issuance.
- Signs may produce a maximum 0.3 foot-candles over ambient light levels. The display brightness must be controlled by a photocell or light sensor that adjusts the brightness to the required level based on ambient light conditions without the need for human input.
- Any sign area not comprising the digital display panel is prohibited. This area includes, but is not limited to, static sign area, appendages, cutout letters, and figures. A frame surrounding the display panel up to 12 inches in width is permitted.
- Where screen transitions are used, such transitions cannot give the appearance of moving text or images. The sign copy must not use flashing, intermittent or moving lights or produce the optical illusion of movement.
- Each sign copy must be displayed for a minimum of four seconds. The still images may not move or present the appearance of motion and may not use flashing, scintillating, blinking, or traveling lights or any other means not providing constant illumination. Transition or blank screen time between one still image and the next may not exceed one second.

Billboards shall not contain any of the following:

- Moving parts.
- Appendages, cut-out letters or figures that protrude beyond the flat surface of the sign face.

[3] California Scenic Highway Mapping System, California State Scenic Highway System Map (arcgis.com). Accessed February 4, 2022.

- Lights that flash, shimmer, glitter or give the appearance of flashing, shimmering or glittering. Exceptions to this restriction include time, temperature and smog index units.
- Walls or screens at the base of the sign which create a hazard to public safety or provide an attractive nuisance.
- Copy which simulates any traffic sign in a manner which confuses the public.
- Copy which duplicates any other content displayed on the sign.
- Devices which emit audible sound, or odor or particulate matter.

Based on the distance from the nearest residentially zoned property and in compliance with the regulations set forth in the proposed Municipal Code amendments, Potential Billboard Areas 1-3 would not conflict with applicable zoning laws or regulations concerning scenic quality. Potential Billboard Areas 4-6 are within industrial business parks and commercial areas where off-premise signage and advertisement already exist and match the commercial character of the surrounding area. Compliance with the standard conditions and design parameters in the Billboards Ordinance would preclude impacts to scenic quality. Impacts would be less than significant and no mitigation is required.

Threshold (d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The primary concern is potential distraction of drivers traveling along SR-22, I-5, and SR-55. To ensure that digital billboard lighting does not interfere with adjacent traffic, the proposed billboards would be required to comply with the following requirements included in the proposed Billboards Ordinance, as summarized below:

- Signs must produce a maximum 0.3 foot-candles over ambient light levels.
- The display brightness will be controlled by a photocell or light sensor that adjusts the brightness to the required level based on ambient light conditions without the need for human input. Use of other brightness adjustment methods, such as timer- or calendar-based systems, will only be used as a backup system.
- The display will be factory-certified as capable of complying the illumination standards.
- If requested by the City, an independent contractor will verify that the brightness levels of the digital billboard are in compliance with the requirements of the Billboards Ordinance. The cost will be the responsibility of the sign owner.
- All signs will be equipped with a control system that, in the event of a display or control malfunction, "freezes" the display on either a single, unchanging message, or a blank screen.
- Any sign area not comprising the digital display panel is prohibited. This area includes, but is not limited to, static sign area, appendages, cutout letters, and figures.
- Where screen transitions are used, the transitions cannot give the appearance of moving text or images. The sign copy cannot use flashing, intermittent, or moving lights or produce the optical illusion of movement.
- Each sign copy will be displayed for a minimum of four seconds. The still images may not move or present the appearance of motion and may not use flashing, scintillating, blinking, or traveling

lights or any other means not providing constant illumination. Transition or blank screen time between one still image and the next may not exceed one second.

- All digital billboards must comply with all applicable laws and regulations concerning brightness, including, without limitation, California Vehicle Code Section 21466.5, and as amended.
- All digital billboards must provide sufficient time for public service announcements as set forth in the approved Operating Agreement. Such public service announcements may not be concentrated during non-peak hours and must be evenly dispersed throughout peak hours so as to maximize their benefit for the community and passer-by traffic.

In addition, each billboard is required to comply with all applicable federal, State, and local laws and regulations including, but not limited to, the Highway Beautification Act of 1965 (23 U.S.C. 131), the California Outdoor Advertising Act, and the California Vehicle Code.

Compliance with federal, State and design standards and operating agreements with the City would reduce potential impacts to a less than significant level. The proposed project would comply with the City's Billboards Ordinance design and operation regulations to ensure the compatibly of the billboard with the surrounding commercial, residential, industrial areas and reduce substantial light and glare. Therefore, impacts would be less than significant.

Cumulative Impacts

The cumulative study area for aesthetic impacts is the viewshed that includes the project site and surrounding areas. The context in which a project is being viewed will also influence the significance of the aesthetic impact. The contrast a project has with its surrounding environment may actually be reduced by the presence of other cumulative projects. For example, if most of an area becomes urbanized, the contrast of a project with the natural surroundings may be less since it would not stand out in contrast as much. In order for a cumulative aesthetic impact to occur, the proposed elements of the cumulative projects would need to be seen together or in proximity to each other. If the projects are not near each other, the viewer would not perceive them in the same scene. As previously noted, the provisions of the Outdoor Advertising Act include the prohibition of flashing, intermittent, or moving light or lights; the prohibition of any illumination or message change that is in motion or appears to be in motion or that change or expose a message for less than four seconds; and the siting of a sign no closer than 500 feet of an existing billboard or 1,000 feet of another message center display (billboard) on the same side of the highway. Additionally restrictions and prohibitions are related to zoning and setbacks. The potential aesthetic impacts related to views, aesthetics, and light and glare is site specific. As part of the permitting process, applicants would need to demonstrate compliance with design standards and requirements with the Billboards Ordinance. No significant cumulative visual impacts are anticipated.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.2 Agriculture and Forestry Resources

Threshold (a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resource Agency, to non-agricultural use?

No Impact. The State of California, Department of Conservation, Farmland Mapping and Monitoring Program, has designated the project area as Urban and Built-Up Land. This farmland category defines Urban and Built-Up Land as land developed at a density of at least 1 dwelling unit per 1.5 acres, or approximately 6 structures to a 10-acre parcel. Land uses include but are not limited to residential, industrial, office/commercial, institutional, and public administration. The Potential Billboard Areas and surrounding areas are not identified as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance.[4] No farmland would be converted. Therefore, no impact would occur and no mitigation is required.

Threshold (b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. A Williamson Act contract between local governments and private landowners restricts specified parcels of land to agricultural or related open space use in return for a lower property tax assessment. None of the Potential Billboard Areas are under a Williamson Act contract and existing zoning designations do not allow for agriculture uses. Therefore, the proposed project is not considered to conflict with agricultural zoning designation or Williamson Act contract. Therefore, no impact would occur and no mitigation is required.

Threshold (c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?

Threshold (d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The proposed project would not conflict with existing zoning for forest land, timberland, or timberland production. There are no forest or timberland resources within the Potential Billboard Areas and existing zoning designations do not permit such uses. Therefore, no impact would occur and no mitigation is required.

Threshold (e) Would the project involve other changes in the existing environment which, due to their location or nature could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest land?

No Impact. The project site does not include or is proximate to agricultural uses or forest land and would not directly or indirectly result in the conversion of property from agricultural or timberland uses. Therefore, no impact would occur and no mitigation is required.

[4] California Important Farmland Finder, State of California Department of Conservation, https://maps.conservation.ca.gov/dlrp/ciff/. Accessed February 4, 2022.

Cumulative Impacts

The proposed project would have no impact on agricultural and forestry resources. The General Plan does not identify any agricultural or forestry resources near the project site. Therefore, no cumulative impacts would occur.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.3 Air Quality

An air quality analysis was prepared by Kimley-Horn and Associates, Inc. (Kimley-Horn, 2020) for the proposed project. The air quality modeling outputs and results are included in Appendix B of this Initial Study and the results are summarized herein.

Threshold (a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project area is in the South Coast Air Basin (Air Basin) which includes all of Orange County and non-desert portions of San Bernardino, Los Angeles, and Riverside counties. The Air Basin is approximately 6,600 square miles extending from the Pacific Ocean to the San Gabriel, San Bernardino, and San Jacinto Mountains. The Air Basin is a coastal plain with broad valleys and low hills, and semi-arid climate. The South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB) monitor air quality within the Air Basin.

The Air Quality Management Plan (AQMP) is prepared by SCAQMD and the Southern California Association of Governments (SCAG). Air quality plans describe air pollution control strategies and measures to be implemented by a city, county, region, and/or air district. The primary purpose of an air quality plan is to bring an area that does not attain federal and State air quality standards into compliance with the requirements of the federal Clean Air Act and California Clean Air Act. Non-attainment is used to refer to an air basin where one or more ambient air quality standards are exceeded. In addition, air quality plans are developed to ensure that an area maintains a healthful level of air quality based on the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS).

The current plan is the 2016 AQMP adopted on March 3, 2017. The 2016 AQMP is designed to meet the State and federal Clean Air Act planning requirements and focuses on federal ozone and ultra-fine particulate matter ($PM_{2.5}$) standards. The SCAQMD's AQMP was prepared to accommodate growth; to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD; and to attain clean air within the region. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used to formulate the AQMP.

The SCAQMD's CEQA Handbook identifies two key indicators of consistency with the AQMP:

1. Whether a project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
2. Whether a project will exceed the assumptions in the AQMP based on the year of project buildout and phase.

With respect to the first criterion, based on the air quality modeling analysis conducted for the proposed project, the construction and operation of the project would not result in significant impacts based on the SCAQMD thresholds of significance (refer to Threshold[b], below for a discussion of the construction and operational analysis). Therefore, project construction and operations would not increase the frequency or severity of existing air quality violations. The proposed project is not forecasted to contribute to the exceedance of any air pollutant concentration standards.

With respect to the second criterion, the proposed project would not result in any zone changes and is not a project that would generate population growth. Therefore, the project would not affect the SCAG

growth forecasts for the City. As such, the project would not interfere with attainment because the project would not interfere with the growth projections used to formulate the AQMP. Additionally, the SCAQMD's CEQA Handbook indicates that significant projects may include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. Therefore, the proposed project is not defined as significant. Therefore, no impact would occur as the project is also consistent with the second criterion.

SCAG forecasts are based on the general plans of municipalities in the Air Basin. As addressed in the following analysis, total project emissions are less than the SCAQMD significance thresholds. The emissions increase due to the project would not interfere with the AQMP or the attainment of the ambient air quality standards. Therefore, emissions from the project would not be greater than those anticipated in the AQMP.

The determination of AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Air Basin. The proposed project would not result in a long-term impact on the region's ability to meet State and federal air quality standards. Also, the proposed project would be consistent with the goals and policies of the AQMP for the control of fugitive dust as required by SCAQMD Rules 403 and 402, as part of Standard Condition (SC) AQ-1.

Threshold (b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

Construction Emissions

Less Than Significant Impact. Air quality standards in Southern California are identified by both the U.S. Environmental Protection Agency in the NAAQS and CARB in the California CAAQS. The air quality standards of the following five criteria pollutants relate to development projects: ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and particulate matter (PM_{10} and $PM_{2.5}$). Of these criteria pollutants, the air basin in which Santa Ana lies is designated nonattainment for O_3 and particulate matter, meaning the Air Basin has recorded exceedances of the air quality standards for these pollutants in recent years.[5]

Construction activities associated with potential billboard installation would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the project area include ozone-precursor pollutants (i.e., reactive organic gases [ROG] and NO_X) and PM_{10} and $PM_{2.5}$. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

According to the SCAQMD, an air quality impact is considered significant if a proposed project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during project construction and operations, as shown in Table 4, *South Coast Air Quality Management District Emissions Thresholds*.

[5] A portion of the Air Basin in Los Angeles County is also designated a non-attainment basin for lead, which is not a criteria pollutant that is relevant to this project, since air emissions of lead would not be generated by the project.

Table 4. South Coast Air Quality Management District Emissions Thresholds		
	Construction-Related	**Operational-Related**
Criteria Air Pollutants and Precursors (Regional)	**Average Daily Emissions (pounds/day)**	**Average Daily Emission (pounds/day)**
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55
Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds,* April 2019.		

Construction equipment, trucks, worker vehicles, and ground-disturbing activities associated with proposed project construction would generate emissions of criteria air pollutants and precursors. Project construction emissions would occur from ground disturbance (boring for the column support) and combustion pollutants from on-site construction equipment and on-road construction vehicles traveling to and from each billboard's location. For this analysis, it was assumed that construction activities would involve approximately 6 construction workers per day (12 one-way worker trips), 3 vendor round trips per day (6 one-way vendor trips), and a total of 4 haul truck trips.

Air quality impacts were assessed according to CARB and SCAQMD recommended methodologies. Where criteria air pollutant quantification was required, the California Emissions Estimator Model (CalEEMod) was used to model construction emissions for ROG, NO_x, CO, SO_X, PM_{10}, and $PM_{2.5}$. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Table 5, *Construction Emissions*, identifies the anticipated daily construction emissions. While it is anticipated that construction activities would not occur concurrently, the maximum number of concurrent construction activities could be six activities before the exceedance of the SCAQMD significance thresholds. Therefore, construction impacts of future standard modifications and digital conversions undertaken pursuant to the proposed Billboards Ordinance would be less than significant.

Table 5. Construction Emissions						
	Pollutant (pounds per day) [a]					
Emissions Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Construction: 2020	0.69	8.46	4.29	0.02	0.46	0.30
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
ROG: reactive organic gases; NOx: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter.						
a. Emissions were calculated using the California Emissions Estimator Model (CalEEMod), as recommended by the SCAQMD. Refer to Appendix B.						
Source: Kimley-Horn, 2020.						

Operational Emissions

Less Than Significant Impact. The proposed Billboards Ordinance would allow digital billboards along the freeway frontages in specific Potential Billboard Areas, establish billboard sign standards, and amend the

Santa Ana Municipal Code. The proposed project provides regulations where new digital billboards would be allowed and does not propose any specific new off-premise billboard or the digital conversion of existing static billboards along the freeway frontages.

Minimal operational activities would occur for static and digital billboards. The operation of static and digital billboards would not require employee or customer vehicular trips, only periodic vehicle trips required for LED bulb replacement, which typically would occur once every five years for digital signs. Minimal criteria air pollutants emissions would be generated during operational activities from the vehicle trips required for LED bulb replacement, resulting in a maximum increase of three round-trip truck trips (six one-way truck trips) every five years over existing conditions. The periodic nature of operational activities occurring every five years would result in minimal operational impacts that would directly affect air quality.

As digital conversions are completed within the City, the electricity usage for billboards would incrementally increase. Using assumptions regarding the amount of electricity that is required by typical static and digital billboards, annual electricity usage of a typical digital billboard would be approximately 66 megawatt-hours (MWh).

Electricity use would contribute indirectly to criteria air pollutant emissions. However, the emissions from electricity use are only quantified for greenhouse gases (GHGs) in CalEEMod because criteria pollutant emissions occur at the site of the power plant, which is typically off-site. With the exception of potential GHG effects associated with increased electricity demand in the project area, the operational impacts to air quality would be minimal given the scale and periodic nature of the expected operational activities resulting from existing billboards that would undergo digital conversions. As there would be minimal criteria air pollutant emissions, the operational emissions are anticipated to be nominal. Implementation of the proposed Billboards Ordinance would not violate existing air quality standards, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The Air Basin is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for federal standards. As discussed above, project construction emissions by themselves would not have the potential to exceed the SCAQMD significance thresholds for criteria pollutants.

Since these thresholds indicate whether individual project emissions have the potential to affect cumulative regional air quality, it can be expected that project construction emissions would not be cumulatively considerable. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be used during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the Air Basin, which would include related projects. Compliance with SCAQMD rules and regulations would reduce the proposed project construction-related impacts to a less than significant level. Therefore, project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. Construction emissions associated with the proposed project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the Air Basin's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As discussed above, the proposed project's operational emissions would be nominal and would not exceed SCAQMD thresholds. As a result, operational emissions associated with the proposed project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant.

Threshold (c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for the following situations: CO hotspots; localized emissions concentrations, toxic air contaminants (TACs, specifically diesel particulate matter) from on-site construction; and asbestos during demolition.

Carbon Monoxide Hot Spots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection as a result of the proposed project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The Air Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2016 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD *CO Hotspot Analysis*, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35 ppm federal standard. The proposed project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's *CO Hotspot Analysis*.

New billboards or digital conversions would require minimal on-road vehicle trips during construction. Operations of converted billboards would not increase daily vehicular trips and new billboards would generate minimal and infrequent vehicle trips. As the CO hotspots were not experienced at the Wilshire

Boulevard/Veteran Avenue intersection even as it accommodates 100,000 ADT, it can be reasonably inferred that CO hotspots would not be experienced at any intersections in the project vicinity resulting from the minimal vehicle trips from the construction or operation of new billboards or digital conversions. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. As a result, no significant impacts would occur and no mitigation is required.

Localized Significance Threshold Analysis

Localized Significance Analysis. The Localized Significance Threshold (LST) Methodology provides a look-up table for construction and operational emissions based on the emission rate, location, and distance from receptors, and provides a methodology for air dispersion modeling to evaluate whether a construction or operation could cause an exceedance of an ambient air quality standard. The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-Up Tables and the methodology described in *Localized Significance Threshold Methodology* (SCAQMD, revised July 2008) to determine if the daily emissions of CO, NO_x, PM_{10}, and $PM_{2.5}$, from the project would result in a significant impact to local air quality. Construction emissions were compared to the SCAQMD's screening thresholds. The nearest sensitive receptors to the project site include residences that are required to be no closer than 500 feet (152 meters) away from potential billboard locations.

Table 6, *Localized Significance of Construction Emissions,* shows that construction emissions would not exceed SCAQMD LSTs. Therefore, the project would not result in significant localized construction emissions.

Table 6. Localized Significance of Construction Emissions

Emission Source	Pollutant (pounds per day)			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Construction – 2020	7.58	3.68	0.27	0.25
SCAQMD Localized Significance Threshold (Adjusted for 1 acre of disturbance at 50 meters)	***83***	***753***	***12***	***4***
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**

NO_x: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter.
Refer to Appendix B for Model Data Outputs.
Source: Kimley-Horn, 2020.

Toxic Air Contaminants

Construction would result in the generation of diesel particulate matter (diesel PM) emissions from the use of off-road diesel equipment required for grading and excavation, paving, and other construction activities. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to toxic air contaminant emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models

and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.

Diesel particulate matter emissions would be emitted from heavy equipment operations and heavy-duty trucks during construction. Proposed construction activities for new billboards and digital conversions, would occur intermittently and would be brief; therefore, implementation of the proposed Billboards Ordinance would not require extensive use of heavy-duty construction equipment or extensive use of diesel trucks. As described above, billboard installation does not require an extensive amount of earthwork; therefore, construction PM_{10} (representative of diesel particulate matter) exposure would be minimal.

Construction projects contained on a site of small size generally represent less than significant health risk impacts due to (1) limitations on the off-road diesel equipment able to operate and thus a reduced amount of generated diesel PM; (2) the reduced amount of dust-generating ground disturbance possible compared to larger construction sites; and, (3) the reduced duration of construction activities compared to the development of larger sites. Additionally, it should be noted that billboard construction would not last more than one week. The California Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Guidance Manual (2015), does not recommend assessing cancer risk for projects lasting less than two months due to the uncertainty in assessing cancer risk from very short-term exposures.

Additionally, construction is subject to and would comply with California regulations (e.g., California Code of Regulations, Title 13, Division 3, Article 1, Chapter 10, Sections 2449 and 2485), which reduce diesel PM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes. These regulations would further reduce nearby sensitive receptors' exposure to temporary and variable diesel PM emissions.

Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the project site (i.e., construction is not likely to occur in any one location for an extended time), the dose of diesel PM of any one receptor is exposed to would be limited. Therefore, considering the relatively short duration of diesel PM-emitting construction activity at any one location of the plan area and the highly dispersive properties of diesel PM, sensitive receptors would not be exposed to substantial concentrations of construction-related TAC emissions. Impacts would be less than significant.

Operation of new or converted billboards would not result in any non-permitted direct emissions (e.g., those from a point source such as diesel generators) or result in a substantial increase in diesel vehicles (i.e., delivery trucks) over existing baseline conditions. Overall, implementation of the proposed Billboards Ordinance would not result in substantial TAC exposure to sensitive receptors in the vicinity of the project area. Impacts would be less than significant and no mitigation is required.

Threshold (d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The SCAQMD CEQA Air Quality Handbook (SCAQMD, 1993) identifies certain land uses as sources of odors. These land uses include agriculture, wastewater treatment plant, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project is a residential development and does not propose to include any odor-inducing uses on the site.

During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors are a temporary short-term impact that is typical of construction projects and would disperse rapidly. The project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, impacts would be less than significant and no mitigation is required.

Mitigation Program

Standard Conditions and Requirements

SC AQ-1 **Dust Control.** During construction, construction contractors shall comply with South Coast Air Quality Management District (SCAQMD) Rules 402 and 403 in order to minimize construction emissions of dust and particulates. SCAQMD Rule 402 requires that air pollutant emissions not be a nuisance off-site. Rule 402 prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

SCAQMD Rule 403 requires that fugitive dust be controlled with Best Available Control Measures so that the presence of such dust does not remain visible beyond the property line of the emission source. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. This requirement shall be included as notes on the contractor specifications. Table 1 of Rule 403 lists the Best Available Control Measures that are applicable to all construction projects. The measures include, but are not limited to, the following:

a. Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

b. All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

c. All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

d. The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

e. Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

Mitigation Measures

No mitigation is required.

4.4 Biological Resources

Threshold (a) Would the project have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Potential Billboard Areas are developed and do not contain habitat of sufficient importance to species regulated by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS). Animal life within the Potential Billboard Areas consists of species commonly found in an urban area. The Santa Ana General Plan Conservation Element and the Open Space, Parks, and Recreation Element do not identify any protected species within the City.

Implementation of digital conversions and standard modifications and installation of new billboards pursuant to the proposed Billboards Ordinance would involve limited ground disturbance. Activities would occur on fully developed parcels adjacent to freeway frontages that are devoid of suitable habitat for sensitive species. Due to the highly developed nature of the Potential Billboard Areas and the types of activities that such future projects would entail, a substantial adverse effect on species identified as candidate, sensitive, or special status would not occur as a result of the proposed project. Typical billboard construction or relocation installation lasts fewer than seven days and have a limited disturbance footprint. No trees are expected to be removed from project implementation. Therefore, impacts on any candidate, sensitive, or special status species would be considered less than significant.

Threshold (b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Threshold (c) Would the project have a substantial adverse effect on a State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. There are no riparian habitats or federally protected wetlands or resources within the Potential Billboard Areas. The Potential Billboard Areas do not contain any water resources (e.g., streams, creeks, channels, vernal pools) nor would any of the proposed land uses potentially impact wetlands. Therefore, no impacts to riparian habitat or wetlands would result from the proposed project and no mitigation is required.

Threshold (d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Wildlife movement corridors are physical connections that allow wildlife to move between areas of suitable habitat in both undisturbed and fragmented landscapes. The General Plan Conservation Element and the Open Space Element do not identify any designated wildlife corridors in the City. Additionally, the Potential Billboard Areas are not within a bottleneck of habitat between larger areas of core suitable habitat and it is not necessary for wildlife to pass through the site to access essential resources for water, foraging, breeding, or cover. Potential billboard Areas are bordered by development and therefore the proposed project activities would not fragment natural habitats. Impacts to wildlife movement would be less than significant.

Threshold (e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. Preservation of natural and biological resources, including trees, are discussed in the Santa Ana Municipal Code Chapter 33, Article VII. Specifically, the Municipal Code addresses the planning, planting, maintenance, and removal of all trees and other landscape materials in any street or other public area; over any landscape material in any street median, parkway strip or other landscaped portion of a public right-of-way; and over trees and other landscape materials in other public spaces under the jurisdiction of the City. Existing trees in the public rights-of-way would not be disturbed. The proposed project would most likely not impact trees and if any future proposed billboards would be removed, the removal and replanting of trees would adhere to the City's General Plan policies and Municipal Code Chapter 33. Therefore, impacts would be less than significant, and no mitigation is required.

Threshold (f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. According to the CDFW's California Regional Conservation Plans map, the City is within the boundaries of the Orange County Central/Coastal Natural Community Conservation Plan (NCCP) and the Orange County Transportation Authority NCCP/HCP. Although the City is located within the two conservation plans, the Potential Billboard Areas are not within any identified natural communities. The Potential Billboard Areas are in urbanized areas of the City and would not conflict with provisions, goals, or policies, of the NCCP. No impacts would occur.

Cumulative Impacts

Past, present, and reasonably foreseeable future projects are required to implement measures, as set forth in their respective CEQA documents, consistent with federal, State, and local regulations to avoid adverse effects to existing biological resources or to mitigate for significant impacts to these resources. The types of measures required for projects impacting protected habitat, species, and regulated resources can include avoidance, project design features, regulatory approvals, best management practices, and mitigation measures. The proposed project would not cause a significant impact to biological resources. Therefore, the project would not contribute to a potential cumulatively considerable impact.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.5 Cultural Resources

Threshold (a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

No Impact. Historical resources are defined as buildings, structures, objects, sites, and districts of significance in history, archaeology, architecture, and culture. These resources include intact structures of any type that are 50 years or more of age. These resources are sometimes called the "built environment" and can include, in addition to houses, other structures such as irrigation works and engineering features. Historical resources are preserved because they provide a link to a region's past as well as a frame of reference for a community.

The CEQA Guidelines §15064.5, define "historic resources" as resources listed in the California Register of Historical Resources, or determined to be eligible by the California Historical Resources Commission for listing in the California Register of Historic Resources.[6] The National Register of Historic Places recognizes properties that are significant at the national, State and local levels. In accordance with CEQA Guidelines Section 15064.5, a site or structure may be considered a historical resource if it is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of PRC Section 5020.1(j), or if it meets the criteria for listing in either the National Register of Historic Places or the California Register of Historical Resources. CEQA allows local historic resource guidelines to serve as the California Register of Historical Resources criteria if enacted by local legislation to act as the equivalent of the State criteria.

The Potential Billboard Areas are zoned commercial or industrial. According to the General Plan Urban Design Element, none of the City's identified historical resources are within the Potential Billboard Areas. The Santa Ana Water Tower is located near Potential Billboard Area 2, Segment 4. Urban Design Element General Plan Policy 6.2 notes that developments near an existing landmark must be supportive and respectful of the architecture, site, and other design features of the landmark. General Plan Urban Design Element Goal 6, Landmarks, aims to create new and protect existing City landmarks and memorable places that convey positive images. Per the proposed Billboards Ordinance, applicants would need to provide findings that future billboards would not block views major landmarks as part of the CUP process. Development standards outlined in the Billboards Ordinance also restrict billboard heights to 60 feet. Views of designated landmarks in the City would remain protected following compliance with General Plan Goal 6, Policy 6.2, and development standards set forth in the Billboards Ordinance. Therefore, the project would have no impact on historic resources and no mitigation is required.

Threshold (b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact with Mitigation. The Potential Billboard Areas are within urban environments. The likelihood of encountering archaeological resources in the Potential Billboard Areas are considered low due to the extensive ground disturbance and development in the area. However, typical billboard support columns reach depths of approximately 30 feet below the ground surface, which may have the potential to affect a previously unidentified archaeological resource. The project would be required to comply with Mitigation Measure (MM) CR-1, which requires that an archaeologist monitor grading and excavation activities. The archaeologist would have the ability to temporarily halt or redirect work to permit the sampling, identification, and evaluation of the artifacts and resources, as appropriate.

[6] California Public Resources Code Section 5020.1(k), Section 5024.1(g).

If resources are found to be significant, the archaeologist would determine appropriate actions, in cooperation with the City and applicant. Compliance with MM CR-1 would reduce potential impacts to a less than significant level.

Threshold (c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. No known human remains occur within the Potential Billboard Areas, and due to the level of past disturbance, it is not anticipated that human remains exist within the Potential Billboard Areas. In the event human remains are encountered during earth removal or disturbance activities compliance with the California Health and Safety Code Section 7050.5, PRC 5097.98, as identified in SC CR-1 would reduce any impact associated with human remains to less than significant levels.

Cumulative Impacts

Potential cumulative impacts could occur if the project – when combined with other past, present, and reasonably foreseeable future projects – would cause significant impacts based on the thresholds of significance set forth in this Initial Study. The Potential Billboard Areas do not contain significant historic resources and is not expected to impact any known archaeological resources; mitigation measures have been identified to mitigate potential impacts to a less than significant level. As with the proposed project, other past projects, other current projects, and probable future projects would be required to comply with mitigation measures. Despite the site-specific nature of resources, mitigation required for the identification and protection of unknown or undocumented resources would reduce the potential for cumulative impacts. On a cumulative level, data recovered from sites in the region allow for the examination and evaluation of the diversity of human activities in the region. The proposed project would not contribute to a cumulatively considerable impact on cultural resources.

Mitigation Program

Standard Conditions and Requirements

SC CR-1 California Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5, and Public Resources Code Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. California Health and Safety Code Section 7050.5 requires that in the event that human remains are discovered, disturbance of the site shall be halted until the coroner has conducted an investigation into the circumstances, manner and cause of death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Public Resources Code Section 5097.98. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Mitigation Measures

MM CR-1 Prior to the issuance of the first grading permit or permit for ground disturbance activities, the applicant shall provide evidence to the City of Santa Ana that a qualified professional (i.e., archaeologist, historian, architect, Native American Tribal monitor), has been retained. The selection of the qualified professional(s) shall be subject to the acceptance

of the City. In the event that cultural resources (archaeological, historical, paleontological) are inadvertently unearthed during excavation and grading activities of any future development project, the contractor, monitor, or archaeologist shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The qualified professional shall be contacted to evaluate the significance of the finding an appropriate course of action. Any unique archaeological resource that is discovered shall be treated in accordance with PRC 21083.2. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the State CEQA Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.

4.6 Energy

Threshold (a) Would the project result in a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The following discusses the potential energy demands from construction activities associated with the potential construction of digital billboards. Operational energy uses associated with the operation of all digital display billboard are also addressed in this section.

Short-Term Construction

Although the proposed Municipal Code amendments do not specifically require energy expenditures, indirect consequences include the use of construction equipment and vehicle fuels during the potential billboard construction and relocation activities. The use of energy resources by construction equipment and vehicles would fluctuate according to the phase of construction and would be temporary. Upon completion of the potential upgrade and/or relocation activities, all construction activities would cease. Contractors would comply with Section 2449 of the California Code of Regulations, Title 13, Chapter 9, Article 4.8, which requires minimizing non-essential idling of construction equipment during Construction. Compliance with Section 2449 would limit wasteful and unnecessary energy consumption.

Construction of a digital billboard would require the use of nonrenewable construction material, such as concrete, metals, and plastics. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation, and construction of the signs. The scope of construction activities is minimal with removal activities occurring in short periods and construction activities approximately one week. Large amounts of energy would not be expended, and all construction vehicles would comply with federal and State standards for on- and off-road vehicles (e.g., emission standards set by the California Air Resources Board), meaning wasteful usage of energy would not occur. Construction-related impacts would therefore be less than significant.

Operational Electricity

Digital billboards are comprised of LEDs, power supplies, cooling systems, lighting controls, and a computer, with LEDs being the largest portion of the energy consumption, particularly during peak demand times when ambient lighting from sunlight is the brightest.[7] Annual energy usage of a typical digital billboard ranges from 50 to 320 MWh depending on the size.[8] Energy consumption for the proposed project is estimated at approximately 66 MWh per year and consistent with the lower end of that range. Digital billboards produced in recent years require significantly less energy (between 50 to 70 percent less, in some cases) than those produced several years ago.[9] In addition, energy savings can come from the use of high-quality LEDs and tighter brightness control settings, resulting in up to 85 percent reduction in power usage. The operational parameters of the proposed project (i.e., 0.3-foot candle at 250 feet), meaning that the signs would always operate at one-sixth of the maximum brightness level for LED billboards, as set forth by California State law, resulting in efficient energy consumption. LED lighting used in the proposed billboard would meet Title 24 requirements for energy efficiency.

Southern California Edison (SCE) provides electricity to the City. The increased demand is expected to be adequately served by the existing SCE electrical facilities. Annual total electricity demand in California is

[7] Energy Solutions, *Digital Billboard Energy Use in California*, July 2014.
[8] Gregory Young, *Illuminating the Issues Digital Signage and Philadelphia's Green Future*, 2010.
[9] Energy Solutions, *Digital Billboard Energy Use in California*, July 2014.

forecast to increase by approximately 50,000 GWh—or 50 billion kWh—between 2022 and 2030[10]. Total electricity demand in SCE's service area is forecast to increase by approximately 12,000 gigawatt-hours (GWh)—or 12 billion kWh—between 2015 and 2026. The increase in electricity demand from the project would represent an insignificant percent increase compared to overall demand in SCE's service area. Therefore, projected electrical demand would not significantly impact SCE's level of service.

It should also be noted that the project design and materials would comply with the then-current Building Energy Efficiency Standards. Prior to issuance of a building permit, the City of Santa Ana Planning and Building Agency would review and verify that the project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards.

Project implementation would not interfere with achievement of the 60 percent Renewable Portfolio Standard set forth in Senate Bill (SB) 100 for 2030 or the 100 percent standard for 2045. These goals apply to SCE and other electricity retailers. As electricity retailers reach these goals, emissions from end-user electricity use would decrease from current emission estimates.

Operational Fuel

Vehicle maintenance trips would be irregular (less than one per month), and the operation of the sign would not generate daily trips. Consequently, the proposed project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities.

There are no aspects of the project that would foreseeably result in the inefficient, wasteful, or unnecessary use of energy during construction or operational activities. The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant and no mitigation is required.

Threshold (b) Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Project implementation would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur. The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Executive Order (EO) S-14-08, signed in November 2008, expanded the State's renewable portfolios standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). SB 350 increased the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 45 percent by 2027) and SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

The proposed project would use electrical power service that is currently provided by Southern California Edison. The proposed digital LED billboards would be constructed pursuant to current electrical codes, including Title 24 of the State Building Code. The proposed new digital proposed project would not conflict with any State or local plans for renewable energy or energy efficiency. As such, impacts would be less than significant and no mitigation is required.

[10] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, Figure ES-1: Statewide baseline Annual electricity Consumption, Available at: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244. Accessed February 15, 2022.

Cumulative Impacts

Potential cumulative impacts could occur if the project – when combined with other past, present, and reasonably foreseeable future projects – would cause significant impacts based on the thresholds of significance set forth in this Initial Study. The proposed project would require limited energy resources. Impacts would be less than significant. The proposed project would not contribute to a cumulatively considerable impact on energy resources.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.7 Geology and Soils

Threshold (a.i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Less Than Significant Impact. The City of Santa Ana, as well as most of Southern California, is located in a region of historic seismic activity. According to the Alquist-Priolo Fault Zone and Seismic Hazard Zone Map, the Potential Billboard Areas are not located in a Fault Zone. Therefore, the proposed project would not result in any significant impacts in relation to a rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Map.

Threshold (a.ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. As noted, the City is in a region of historic seismic activity. The Potential Billboard Areas would experience similar moderate to occasionally high ground shaking from regional faults as well as ground shaking from other seismically active faults of the Southern California region. The potential for damage resulting from seismic-related events include ground shaking, ground failure, and ground displacement. Strong levels of seismic ground shaking can cause damage, particularly to older and/or poorly constructed structures. Construction of future billboards within Potential Billboard Areas would be required to conform to the seismic design parameters of the California Building Code as adopted by the City. As a part of the permit application process, the City would review all project plans for grading, foundation, structural, infrastructure, and all other relevant engineering details relative to the Code requirements. Compliance with all applicable regulations and existing standards would preclude impacts related to strong seismic ground shaking; no mitigation is required.

Threshold (a.iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the loss of strength where loose, saturated, relatively cohesion-less soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, characteristics of the subsurface soils, in-situ stress condition, and the depth to groundwater. Soil susceptible to liquefaction includes loose to medium dense sand and gravel, low-plasticity silt, and some low-plasticity clay deposits. According to the State of California Earthquake Zones of Required Investigation, some Potential Billboard Areas are susceptible to liquefaction. However, the proposed project is not intended for human occupancy. The City's permitting application process would review plans, specifications, engineering calculations, diagrams, soil investigation reports, and structural data, as necessary, to ensure compliance with the current California Building Code standards. Therefore, impacts are less than significant and no mitigation is required.

Threshold (a.iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

No Impact. Landslides can occur if areas of steep slopes consisting of unstable soils are disturbed by ground shaking and/or heavy rainfall. According to the State of California Earthquake Zones of Required

Investigation, the Potential Billboard Areas are not within an area identified as having a potential for landslides. There are no known landslides near the Potential Billboard Areas nor are the Potential Billboard Areas in the path of any known or potential landslides. Therefore, no impacts related to landslides would occur and no mitigation is required.

Threshold (b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Limited excavation is expected for the installation of the billboard pylon footings and infrastructure connections. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the proposed project would be required to comply with erosion and siltation control measures. This would include measures such as sand-bagging to reduce site runoff or hold topsoil in place prior to final grading and construction. Given the developed characteristic of the Potential Billboard Areas and the limited area of disturbance, no significant adverse impacts related to expansive soil erosion or loss of topsoil are anticipated and no mitigation is required.

Threshold (c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Threshold (d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Potential Billboard Areas or in the general vicinity. The potential for landslides and liquefaction are minimal due to the relatively flat area and the depth of the groundwater table. According to the U.S. Natural Resources Conservation Service Web Soil Survey, the Potential Billboard Areas are composed of Chino Silty clay loams which drain poorly and Mocho Loams, which are moderately well drained.[11] Although the Potential Billboard Areas may be located on poorly drained soils, no significant new grading or excavation would be required as part of the proposed project's implementation. The City's permitting process would review all engineering plans for foundation and structural details to ensure compliance with California Building Code standards. Therefore, no significant adverse impacts related to expansive soils are anticipated and no mitigation is required.

Threshold (e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed project is not a land use that generates wastewater or requires a sanitary sewer system for wastewater disposal. Therefore, no impact would occur and no mitigation is required.

Threshold (f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation. The Potential Billboard Areas are within urbanized areas. Although not expected, there is a possibility that project construction activities have the potential to affect

[11] USDA Web Soil Survey, https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed February 4, 2022.

unidentified paleontological resources since typical billboard support columns reach depths of approximately 30 feet. Therefore, implementation MM GEO-1, which addresses the actions to be taken should paleontological resources be found, is required to reduce potential impacts to paleontological resources to a less than significant level.

Cumulative Impacts

The proposed project would be constructed in compliance with all applicable codes and in accordance with the mitigation set forth in this Initial Study, which are designed to reduce the exposure of people or structures to substantial risk of loss, injury, or death related to geological conditions or seismic events. The potential cumulative impact related to earth and geology is typically site-specific. The analysis herein determined that the project would not result in any significant impacts related to landform modification, grading, or the destruction of a geologically significant landform or feature with implementation of mitigation. Existing State and local laws and regulations are in place to protect people and property from substantial adverse geological and soils effects, including fault rupture, strong seismic ground shaking, seismic-induced ground failure (including liquefaction), and landslides.

Existing laws and regulations also protect people and property from adverse effects related to soil erosion, expansive soils, loss of topsoil, development on an unstable geologic unit or soil type that could result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. In addition, the project site is not expected to impact any paleontological resources; mitigation measures have been identified to mitigate potential impacts to paleontological resources to a less than significant level. These existing laws and regulations, along with mitigation required for the project, would render potentially adverse geological and soil effects less than significant. These existing laws and regulations also ensure that past, present, and reasonably foreseeable future projects in the region do not result in substantial adverse geological and soils effects. As a result, the existing legal and regulatory framework would ensure that the incremental geological and soils effects of the project would not result in greater adverse cumulative effects when considered together with the effects of other past, present, and reasonably foreseeable future projects in Santa Ana and the greater Orange County region. Therefore, the project—in combination with past, present, and reasonably foreseeable future projects—would not result in a cumulatively significant impact by exposing people or structures to risks related to geologic hazards, soils, or seismic conditions.

Mitigation Program

Mitigation Measures

MM GEO-1 Prior to the issuance of the first grading permit or permit for ground disturbance activities, the applicant shall provide evidence to the City of Santa Ana that a qualified professional paleontologist has been retained. The selection of the qualified professional(s) shall be subject to the acceptance of the City. In the event that paleontological are inadvertently unearthed during excavation and grading activities of any future development project, the paleontologist or contractor shall temporarily cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The qualified professional shall be contacted to evaluate the significance of the finding an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the State CEQA Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.

4.8 Greenhouse Gas Emissions

A greenhouse gas (GHG) emissions analysis was prepared by Kimley-Horn and Associates, Inc. (Kimley-Horn, 2020) for the proposed project. The GHG modeling outputs and results are included in Appendix B of this Initial Study and the results are summarized herein.

Background

The "greenhouse effect" is the natural process that retains heat in the troposphere, the bottom layer of the atmosphere. Without the greenhouse effect, thermal energy would "leak" into space resulting in a much colder and inhospitable planet. With the greenhouse effect, the global average temperature is approximately 61˚F (16˚C). Greenhouse gases (GHGs) are the components of the atmosphere responsible for the greenhouse effect. The amount of heat that is retained is proportional to the concentration of GHGs in the atmosphere. As more GHGs are released into the atmosphere, GHG concentrations increase and the atmosphere retains more heat, increasing the effects of climate change. Six gases were identified by the Kyoto Protocol for emission reduction targets: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). When accounting for GHGs, all types of GHG emissions are expressed in terms of CO_2 equivalents (CO_2e) and are typically quantified in metric tons (MT) or million metric tons (MMT).

Approximately 80 percent of the total heat stored in the atmosphere is caused by CO_2, CH_4, and N_2O. These three gases are emitted by human activities as well as natural sources. Each of the GHGs affects climate change at different rates and persist in the atmosphere for varying lengths of time. The relative measure of the potential for a GHG to trap heat in the atmosphere is called global warming potential (GWP). The GWP was developed to allow comparisons of the global warming impacts of different gases. Specifically, it is a measure of how much energy the emissions of one ton of a gas will absorb over a given period of time, relative to the emissions of one ton of CO_2. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time period. GWPs provide a common unit of measure, which allows analysts to add up emissions estimates of different gases (e.g., to compile a national GHG inventory), and allows policymakers to compare emissions reduction opportunities across sectors and gases.

Greenhouse gases, primarily CO_2, CH_4, and N_2O, are directly emitted as a result of stationary source combustion of natural gas in equipment such as water heaters, boilers, process heaters, and furnaces. GHGs are also emitted from mobile sources such as on-road vehicles and off-road construction equipment burning fuels such as gasoline, diesel, biodiesel, propane, or natural gas (compressed or liquefied). Indirect GHG emissions result from electric power generated elsewhere (i.e., power plants) used to operate process equipment, lighting, and utilities at a facility. Included in GHG quantification is electric power which is used to pump the water supply (e.g., aqueducts, wells, pipelines) and disposal and decomposition of municipal waste in landfills.[12]

Regulations and Significance Criteria

California Governor Arnold Schwarzenegger issued EO S-3-05 in June 2005, which established the following GHG emission reduction targets: (a) by 2010: Reduce GHG emissions to 2000 levels; (b) by 2020: Reduce GHG emissions to 1990 levels; and (c), by 2050: Reduce GHG emissions to 80 percent below 1990 levels.

[12] California Air Resources Board, *Climate Change Scoping Plan*, December 2008.

Assembly Bill (AB) 32 Statutes of 2006, Health and Safety Code Section 38500 et seq. require that CARB determine what the Statewide GHG emissions level was in 1990 and approve a Statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. CARB has approved a 2020 emissions limit of 427 million metric tons of CO_2 equivalent ($MTCO_2e$). Additionally, issued in April 2015, EO B-30-15 requires Statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030.

EO B-30-15, which was issued in April 2015, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. SB 32 authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. With SB 32, the California Legislature passed companion legislation AB 197, which provided additional direction for developing an updated Scoping Plan. CARB released the second update to the Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32 in November 2017.

Additionally, signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

Due to the nature of global climate change, it is not anticipated that any single development project would have a substantial effect on global climate change. GHG emissions from the proposed project would combine with emissions emitted across California, the United States, and the world to cumulatively contribute to global climate change.

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. The CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions would have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions (14 CRC §15064.4(a)).

On September 28, 2010, the SCAQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level numeric bright-line threshold of 3,000 metric tons of CO_2e annually and an efficiency-based threshold of 4.8 metric tons of CO_2e per service population (residents plus employees) per year in 2020 and 3.0 metric tons of CO_2e per service population per year in 2035.[13] The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments in the Air Basin, various utilities such as sanitation and power companies throughout the Air Basin, industry groups, and environmental and professional organizations. The numeric bright line and efficiency-based thresholds were developed to be consistent with CEQA requirements for developing significance

[13] In *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497, the Supreme Court held that the EIR prepared for the San Diego Association of Governments' (SANDAG) *2050 Regional Transportation Plan/Sustainable Communities Strategy* did not need to include an analysis of the Plan's consistency with GHG emission reduction goals of 80 percent below 1990 levels by 2050 (established by EO S-3-05 to comply with CEQA.

thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies with regard to determining whether GHG emissions from a proposed project are significant.

The City of Santa Ana has not adopted GHG significance thresholds. For the proposed project, the SCAQMD's proposed 3,000 $MTCO_2e$/yr non-industrial screening threshold is used as the significance threshold in addition to the qualitative thresholds of significance set forth below from Section VII of CEQA Guidelines Appendix G. The 3,000 $MTCO_2e$/yr screening threshold represents a 90 percent capture rate (i.e., this threshold captures projects that represent approximately 90 percent of GHG emissions from new sources) and represents emissions associated with development of approximately 70 single-family dwelling units. The 3,000 $MTCO_2e$/year value is typically used in defining small projects that are considered less than significant.[14]

As noted above, the 2017 CARB Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by EO B-30-15 and codified by SB 32. The 2017 Scoping Plan includes various goals for reducing GHG emissions from energy generation, transportation fuel, the extension of the Cap and Trade program, among others. For example, the 2017 Scoping Plan includes the SB 350 renewable portfolio standard requirement of 50 percent by 2030, increased stringency in the low carbon fuel standard, cleaner technology and fuel mobile source strategy, sustainable freight action plan, short-lived climate pollutant reduction strategy, increased stringency of SB 375 targets, extension of the Cap and Trade program, refinery sector reductions, and development of an Integrated Natural and Working Lands Action Plan to create carbon sinks.

Threshold (a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Pursuant to Appendix G of the CEQA Guidelines, a project would have a potentially significant impact if it generates GHG emissions, directly or indirectly, that may have a significant impact on the environment; or conflicts with an applicable plan, policy, or regulation adopted to reduce GHG emissions. Section 15064.4 of the State CEQA Guidelines specifies how the significance of GHG emissions is to be evaluated. The process is broken down into quantification of project-related GHG emissions, making a determination of significance, and specification of any appropriate mitigation if impacts are found to be potentially significant.

Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions. However, it should be noted that Operational emissions associated with the potential digital LED billboards would not include GHG emissions from mobile sources (transportation), water use and treatment, or waste disposal. Table 7, *Digital Billboard Greenhouse Gas Emissions* presents the estimated GHG emissions of a potential individual digital billboard construction or conversion.

[14] On page 3-2 and 3-3 of the SCAQMD's *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (October 2008) the SCAQMD notes that a GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term GHG impacts. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that the SCAQMD estimates that these GHG emissions would account for less than one percent of future 2050 statewide GHG emissions target (85 $MMTCO_2e$/yr). In addition, these small projects would be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory.

Table 7. Digital Billboard Greenhouse Gas Emissions	
Emissions Source	**CO_2e (Metric Tons/Year)**
Construction Emissions	3.85
Construction Emissions Amortized over 30 Years	0.13
Energy	16.36
Total	**16.49**
Note: CalEEMod version 2016.3.2. Refer to Appendix B for Model Data Outputs. Source: Kimley-Horn, 2020.	

Construction emissions would occur from off-road equipment and on-road construction vehicles. Minimal operational activities would occur for static and digital billboards. Project construction would result in the generation of approximately 3.85 metric tons of CO_2e over the course of construction (or 0.13 Metric Tons amortized over 30 years). As recommended by the SCAQMD, standard practice is to amortize construction emissions over 30 years and combine with the project's annual operational emissions[15]. Once construction is complete, the generation of these GHG emissions would cease. Forecasted GHGs from construction have been quantified and amortized over the life of the project (30 years). The amortized construction emissions are added to the annual average operational emissions.

Project operations would not generate area source or substantial mobile source emissions. Operation of static and digital billboards would not require employee or customer trips, only periodic vehicle trips required for LED bulb replacement, which would occur once every five years for digital signs. As digital conversions are completed within the City, the electricity usage of billboards would incrementally increase. Using assumptions regarding the amount of electricity that is required by typical static and digital billboards, annual electricity usage of each potential billboard would be approximately 66 MWh.

Electricity use of an individual potential digital LED billboard would generate approximately 16.36 $MTCO_2e$ per year. This would be 16.49 $MTCO_2e$ per year when combined with the amortized construction emissions. Therefore, approximately 181 billboards could be constructed and operate before triggering the 3,000 $MTCO_2e$ per year GHG threshold. It is therefore assumed that, given the limited scope of construction and minimal operational electricity demand of the proposed digital LED billboard, GHG emissions associated with the proposed project would not exceed SCAQMD's proposed 3,000 $MTCO_2e$ threshold. In addition, with continued implementation of various statewide measures, the project's operational energy source emissions (approximately 99 percent of total project emission) would continue to decline in the future. Impacts would be less than significant.

Threshold (b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The City of Santa Ana Climate Action Plan outlines goals to reduce energy consumption and GHG emissions to become a more sustainable community and to meet AB 32 goals.

The proposed project would be required to comply with all building codes in effect at the time of construction which include energy conservation measures mandated by Title 24 of the California Building Standards Code – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high-efficiency lighting, high-efficiency heating, ventilating, and

[15] The project lifetime is based on the standard 30-year assumption of the SCAQMD, Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, August 26, 2009).

air conditioning (HVAC) systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The most recent standards went into effect January 1, 2020. The 2022 standards were adopted on August 11, 2021 and will apply to buildings whose permit applications are applied for on or after January 1, 2023.[16] Although the City's Energy Plan is primarily focused on reducing municipal energy consumption, the proposed project would not conflict with the community-wide energy use goals of the plan.

Further, the proposed project would result in limited amount of emissions that would comply with the SCAQMD's GHG threshold. In addition, the proposed project would comply with all SCAQMD applicable rules and regulations during construction of the operational phase and would not interfere with the State's goals of reducing GHG emission as stated AB 32 and SB 32.

Therefore, the proposed project would have a less than significant impact on GHG emissions. Consistent with Title 24, AB 32, SB 32, and the Climate Action Plan, the proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Impacts would be less than significant and no mitigation is required.

Cumulative Impacts

As addressed in this Initial Study, because of the global nature of the climate change problem, most projects will not generate GHG emissions that individually will cause a significant impact on global climate change.[17] Therefore, the analysis of a project's GHG impacts is typically not considered individually but is analyzed against the GHG emissions of existing and proposed projects within the region, State, and ultimately against global emissions and how the emissions can cumulatively affect global climate change. This concept is supported in the various case law and Office of Planning and Research and SCAQMD publications.[18] The proposed project would not result in a cumulatively considerable impact associated with GHGs.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

[16] https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency. Accessed February 9, 2022.

[17] California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, 2008.

[18] California Governor's Office of Planning and Research, *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review Technical Advisory*, June 2008; South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold,* October 2008; *Center for Biological Diversity v. National Highway Traffic Safety Administration*, 538 F.3d 1172, 1215-1217 [9th Cir. 2008].

4.9 Hazards and Hazardous Materials

Kimley-Horn conducted a regulatory database search of the Department of Toxic Substances Control (DTSC) Envirostor website (http://www.envirostor.dtsc.ca.gov/public) and the State Water Resources Control Board's geotracker website (http://geotracker.waterboards.ca.gov). The database search was performed to identify potential new hazardous material-regulated facilities on or near Potential Billboard Areas.

Threshold (a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials can occur through transportation accidents; environmentally unsound disposal methods; improper handling of hazardous materials or hazardous wastes (particularly by untrained personnel); and/or emergencies, such as explosions or fires. The severity of these potential effects varies by type of activity, concentration and/or type of hazardous materials or wastes, and proximity to sensitive receptors.

The proposed project would not involve the transport, use, creation or disposal of hazardous materials. Should any unknown contaminated soils or other hazardous materials be discovered and be removed from the project site, the soils/material can be transported only by a licensed hazardous waste hauler in covered containment devices in compliance with all applicable County, State, and federal requirements. The proposed project would not emit hazardous emissions or involve hazardous or acutely hazardous materials, substances, or waste. Impacts associated with the transport, use, or disposal of hazardous materials would be less than significant and no mitigation is required.

Threshold (b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact with Mitigation. There are 19 recorded environmental hazards listed on the Geotracker and Environstor databases within or immediately adjacent to the Potential Billboard Areas. However, all cases have a closed status except for one open case. According to Geotracker, former R & J Aircraft Engines Facility located at 202 E. Stevens Street (Potential Billboard Area 6) is undergoing a site assessment for tetrachloroethylene (PCE) and trichloroethylene (TCE). No site-specific impacts would occur since typical billboard footings would not require deep excavation (30 feet) and would not have the potential to disturb any contaminated groundwater, which reaches a depth of 150 feet to 350 feet. Although several identified environmental hazards within the Potential Billboard Areas have a closed case status, there is still a potential that hazardous substances may be released during billboard construction through contaminated soils. Therefore, implementation of MM HAZ-1 would be required. MM HAZ-1 would require an applicant to submit a soil management plan prior to the issuance of a building permit to ensure any contaminated soils are properly identified, excavated, and disposed of properly. Implementation of MM HAZ-1 would reduce impacts related to accidental release of hazardous materials to a less than significant level.

Threshold (c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are several schools within one-quarter mile of the Potential Billboard Areas. However, the proposed project does not propose any uses which could potentially generate

hazardous materials in significant quantities that would have an impact to surrounding schools. Impacts would be less than significant and no mitigation is required.

Threshold (d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

No Impact. The Potential Billboard Areas do not include any sites identified on a hazardous site list compiled pursuant to California Government Code Section 65962.5.[19] Kimley-Horn reviewed information from the DTSC Envirostor website to identify any releases of regulated substances or petroleum products that occurred on or near the project site, in addition to the Geotracker database search. Although there are several recorded environmental hazards, no cases listed are on the Cortese list. Therefore, no impact would occur.

Threshold (e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. Portions of the proposed project, specifically Potential Billboard Area 6, is in the Federal Aviation Regulations (FAR) Part 77 Notification Area of John Wayne Airport, as identified in the AELUP for John Wayne Airport. Per FAR Part 77, Section 77.13(a), which requires notice to the Federal Aviation Administration (FAA) for any proposed structure more than 200 feet above the ground level of its site. Notices to the FAA provide a basis for evaluating a project's potential effects on operational procedures and air navigation. Coinciding with the FAA regulation, the Airport Land Use Commission also requires notification of all such proposals. The proposed project would allow for the construction and operations of digital billboards. Billboards would be no greater than 60 feet in height above ground level and therefore notification is not required. The proposed project would not result in a safety hazard for people residing or working in the project area and no airport safety impacts would occur.

Threshold (f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed project would not have a significant impact on emergency response plans or emergency evacuation plans. Additionally, all construction activities would occur on-site and no roadway closures would be required. No impact would occur.

Threshold (g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The City is not within an identified local fire hazard area. The project would not expose people or structures to a risk of loss, injury or death involving wildland fires. The Potential Billboard Areas are in a developed urban area and it is not adjacent to or near any wildland areas. See Section 4.20, *Wildfire*, for more discussion on this topic. Therefore, no impact would occur.

[19] California, State of, Department of Toxic Substances Control, DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). Available at: https://dtsc.ca.gov/dtscs-cortese-list/. Accessed: February 9, 2022.

Cumulative Impacts

The incremental effects of the proposed project related to hazards and hazardous materials, if any, are anticipated to be minimal, and any effects would be site-specific. Therefore, the proposed project would not result in incremental effects to hazards or hazardous materials that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. The proposed project would not result in cumulatively considerable impacts to or from hazards or hazardous materials.

Mitigation Program

Standard Conditions

No standard conditions are applicable to the project.

Mitigation Measures

MM HAZ-1 The applicant shall retain a qualified environmental consultant to prepare a Soil Management Plan for Contaminated Soils (SMP) for any proposed billboard. The SMP shall be submitted to the City of Santa Ana Planning and Building Agency for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during excavation and grading activities on the project site to ensure that any contaminated soils are properly identified, excavated, and disposed of off of the site.

4.10 Hydrology and Water Quality

Threshold (a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Urban runoff, both dry and wet weather, discharges into storm drains, and in most cases, flows directly to creeks, rivers, lakes, and the ocean. Polluted runoff can have harmful effects on drinking water, recreational water, and wildlife. Urban runoff pollution includes a wide array of environmental, storm water characteristics depend on site conditions (e.g., land use, impervious cover, and pollution prevention practices), rain events (duration, amount of rainfall, intensity, and time between events), soil type and particle sizes, the amount of vehicular traffic, and atmospheric deposition. Major pollutants typically found in runoff from urban areas include sediments, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogens, and bacteria. Most urban storm water discharges are considered non-point sources.

The proposed project would result in minimal ground disturbance during construction. Typical billboard support columns reach a depth of 30 feet with pylon support structures occupying 5 to 10 square feet in area. For purposes of this Initial Study analysis, construction is expected to result in the export of 30 cubic yards of dirt.

Due to the limited construction and operation footprint of the proposed project, typical short-term impacts related to water quality would not occur. The proposed project would not involve physical features or activities that would lead to erosion or contamination of stormwater runoff. Drainage and flow patterns within the Potential Billboard Areas are not expected to change due to the limited footprint of the billboard pylon support structures. Therefore, the project would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant and no mitigation is required.

Threshold (b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. The proposed project is not expected to require substantial amounts of water use or result in any groundwater extraction. Neither the construction nor operational processes associated with digital conversions, standard modifications, or new billboards would use groundwater supplies. New billboards would have the potential to add impermeable surfaces associated with pole foundations or other ground-mounted structure supports; however, any areas of impermeable surfaces would be minor, and much of the Potential Billboard Areas are already impermeable. Typical billboard support columns reach a depth of 30 feet, which is less than the known groundwater table depth. Therefore, the project would not significantly impact local groundwater recharge. No impact would occur.

Threshold (c.i.) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Threshold (c.ii.) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. The Potential Billboard Areas do not contain any streams or rivers; therefore, such natural resources would not be altered by the proposed project. Future standard modifications, digital conversions, and new billboards installed pursuant to the proposed project would result in limited ground disturbance. All construction activities would be required to comply with the City's water quality best management practices. No ground disturbance would occur during operational activities associated with digital billboards, new billboards, or existing billboards that have undergone standard modifications. The proposed project would involve minimal ground-disturbing activities and, therefore, would not have the potential to substantially alter the existing drainage pattern of the Potential Billboard Areas. As such, the proposed project would not have the potential to result in substantial erosion or siltation on or off-site. Impacts related to erosion and siltation resulting from the proposed project would be less than significant and no mitigation is required.

Threshold (c.iii.) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed previously, project implementation would not require water use nor increase the amount of impervious surfaces in the Potential Billboard Areas such that the rate and or amount of stormwater runoff is increased. As such, these activities would not adversely affect the capacity of stormwater drainage systems. The potential sources of stormwater pollutants associated with project implementation would be limited to construction-related chemicals such as petroleum products used for construction equipment. However, the duration of construction and the amount of equipment and materials that would be required are limited. Operational activities would not create a source of polluted runoff. Therefore, impacts would be less than significant and no mitigation is required.

Threshold (c.iv.) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

No Impact. The Potential Billboard Areas are not located within a 100-year hazard flood zone area. Based on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps, the Potential Billboard Areas are within Zone X, 0.2 percent change flood; areas with 1.0 percent annual change flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; or areas protected by levees from the 1.0 percent annual change of flood.[20] The proposed project does not include structures meant for human occupancy. Therefore, no impacts would occur.

Threshold (d) In flood hazard, tsunami, or seiche zones, would the project risk the release of pollutants due to project inundation?

No Impact. According to Orange County General Plan's Figure IX-9: Prado Dam and Santiago Reservoir Inundation Areas, Potential Billboard Areas 3-5 are outside of the Santiago Reservoir's Inundation Area. Potential Billboard Areas 1, 2, and 6 are within dam inundation areas. However, the proposed use is not a habitable structure. The Potential Billboard Areas are not within a tsunami inundation area; the nearest Potential Billboard Area (Area 6) is more than 6.5 miles from the Pacific Ocean. The proposed project is

[20] FEMA. Flood Insurance Rate Map 06059C0277J. https://msc.fema.gov/portal#. Accessed February 9, 2022.

not a land use that would release pollutants due to inundation. The project is not within a flood hazard, tsunami, or seiche zone and would not risk the release of pollutants. No impacts would occur.

Threshold (e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed under Threshold (a), the proposed project would comply with water quality standards and provisions. In 2014, the California Sustainable Groundwater Management Act was passed, which provides authority for agencies to develop and implement groundwater sustainability plans or alternative plans that demonstrate the water basins are being managed sustainably.[21] The proposed project would not use groundwater supplies and therefore not obstruct with any water quality control plans or groundwater management plans. Impacts are less than significant and no mitigation is required.

Cumulative Impacts

The proposed project in combination with present and reasonably foreseeable future development that would occur within the watershed, would involve construction activities, new development from which runoff would discharge into waterways, potential increased in storm water runoff from new impervious surfaces, and a potential reduction in groundwater recharge areas. Construction of new development within the watershed could result in the erosion of soil, thereby cumulatively impacting water quality within the watershed. In addition, the increase in impermeable surfaces and more intensive land uses within the watershed resulting from future development may also adversely affect water quality by increasing the amount of storm water runoff and common urban contaminants entering the storm drain system. However, new development from the proposed project are limited in grading and footprint, resulting in limited increases in impervious surfaces. Compliance with requirements would minimize degradation of water quality at individual construction sites. As such, no significant cumulative impacts are anticipated.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

[21] State Water Resources Control Board. Sustainable Groundwater Management Act (SGMA). https://water.ca.gov/programs/groundwater-management/sgma-groundwater-management. Accessed February 9, 2022.

4.11 Land Use and Planning

Threshold (a) Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a physical feature, such as an interstate highway or railroad tracks, or removal of access such as roads or bridges. The proposed project does not involve any such features and would not remove any means of access or impact mobility. The proposed project would not result in the division of an established community. Therefore, no impact would occur.

Threshold (b) Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The City's General Plan Urban Design Element was adopted in 1998 and addresses "outdoor space and building form." Urban Design Policy 2.14 states, "Billboards, cellular antennas, microwave towers, and other similar types of features antennas should be placed so as not to be detrimental to the aesthetic quality, character, and image of the surrounding area." This policy is maintained through the development and design standards included in the proposed Billboards Ordinance.

The proposed Billboards Ordinance identifies where freeway adjacent billboards may occur. All identified Potential Billboard Areas are outside of residentially zoned areas and are consistent with the City's existing land use designations and policies. All digital billboards would be required to comply with applicable regulations and standards and operating agreements with the City. Therefore, the proposed project does not conflict with any land use plan, policy, or regulation, and a less than significant impact would occur.

Cumulative Impacts

The potential cumulative impacts with respect to land use are site specific. The analysis determined that the proposed project would not result in any significant adverse impacts. As a result, no significant adverse cumulative land use impacts will occur as part of the proposed project's implementation.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.12 Mineral Resources

Threshold (a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

Threshold (b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The General Plan EIR does not identify State or locally important mineral resource recovery sites or sites within the City. There are no Significant Mineral Aggregate Resource Areas (SMARA) designations within the City. The proposed project does not involve any use that would result in any impacts to mineral resources. Therefore, there would be no loss of a known mineral resource and no impact would occur.

Cumulative Impacts

The analysis of potential impacts indicated that no impacts would result from the proposed project. As a result, no cumulative impacts related to mineral resources would occur.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.13 Noise

Threshold (a) Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinances, or applicable standards of other agencies?

Less Than Significant Impact. Project implementation would result in short-term (construction-related) noise impacts during the installation. Billboards would be installed adjacent to freeways, which have existing high ambient noise levels. Once constructed, potential billboards would not generate noise. All construction activities would be required to comply with the City's noise control standards as set forth in SC-N-1. Compliance with the City's noise standards would preclude significant noise impacts and no mitigation is required.

Threshold (b) Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located near a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach levels that damage structures.

Project implementation would not raise ambient noise levels. However, slight increases in noise levels could occur during the installation phase. However, the increase in noise during the construction phase would be difficult to distinguish due to the high ambient noise levels present around the Potential Billboard Areas. Further, the proposed project would not result in an increase in traffic-related mobile noise or stationary sources. Therefore, impacts would be less than significant and no mitigation is required.

Threshold (c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The closest airport to the Potential Billboard Areas is John Wayne Airport, located approximately 1.4 miles southeast of Potential Billboard Area 6. There are no private airstrips proximate to the project site. Billboards would not exceed a height of 60 feet as measured from nearest adjacent curb level on the site on which the sign is constructed. Project implementation would not result in exposure of people residing or working in the project area to excessive or high noise impact levels. Therefore, no impacts would occur.

Cumulative Impacts

As discussed above, operational noise caused by the proposed project would be less than significant. Due to site distance and these intervening land uses, cumulative stationary noise impacts would not occur. No known past, present, or reasonably foreseeable projects would compound or increase the operational

noise levels generated by the project. Therefore, cumulative impacts relative to temporary and permanent noise generation associated with the proposed project would be less than significant.

Mitigation Program

Standard Conditions and Requirements

SC N-1 All construction activities should be limited to the hours between the hours of 7 a.m. and 8:00 p.m. on weekdays, 8 a.m. and 6 p.m. on weekdays, including Saturday, or any time on Sunday or a federal holiday per Santa Ana Municipal Code Chapter 18-314.

Mitigation Measures

No mitigation measures are applicable to the proposed project.

4.14 Population and Housing

Threshold (a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The proposed project does not include any residential or business uses that would result in substantial population growth due to increased jobs or housing units. Additionally, the project does not include the extension of roads or other infrastructure to unserved areas, which could induce indirect growth. Therefore, no impacts would occur.

Threshold (b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project area does not include any existing housing and no housing would be removed to accommodate the proposed project. Therefore, no impacts would occur.

Cumulative Impacts

The proposed project would not result in unplanned population growth or impact the City's available housing stock. Therefore, no significant cumulative impacts associated with population and housing would occur.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.15 Public Services

Threshold (a.i) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Less Than Significant Impact. The Orange County Fire Authority (OCFA) provides fire protection and emergency services to the City of Santa Ana. The City is in OCFA Division VI and ten fire stations are located throughout the City. OCFA response time goal to emergency calls in urban areas is that the first response unit arrives at a priority emergency within 7 minutes and 20 seconds, 80 percent of the time (source: City of Santa Ana General Plan Update Draft Program EIR). Implementation of the proposed project would not increase the number of residents in the City and would not cause an increase in fire protection services because of the nature of the project. The proposed project would not require the construction of new or alteration of existing fire protection facilities to maintain an adequate level of service to the project area. Therefore, no physical impacts associated with fire protection services and facilities would occur and no mitigation is required.

Threshold (a.ii) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Less Than Significant Impact. The Santa Ana Police Department enforces local, State, and federal laws and provides police service to the City. The Police Department provides emergency police response, non-emergency police response, routine police patrol, traffic violation enforcement, traffic accident investigation, animal control, and parking code enforcement. The Police Department headquarters is located at 60 Civic Center Plaza. The proposed project is not a typical land use that would increase the need for police services; therefore, the demand for police services would not be substantially increased by project implementation. The project would not require the construction of new facilities or require the expansion of existing facilities that would result in physical environmental impacts. Therefore, the project's impact on police protection services would be less than significant and no mitigation is required.

Threshold (a.iii) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives schools?

Less Than Significant Impact. The Santa Ana Unified School District (SAUSD) provides educational services to the City and other unincorporated areas of Orange County. SAUSD has 26 elementary schools, 8 intermediate schools, and 7 high schools in its service area. As addressed, the proposed project would not introduce new residential or business-related uses that could induce population growth. Therefore, the proposed project would not require construction or expansion of SAUSD facilities that could cause significant environmental impacts and SAUSD performance objectives would not be impacted. Therefore, the project's impacts on schools would be less than significant impact and no mitigation is required.

Threshold (a.iv) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

No Impact. Please refer to Section 4.15, *Recreation*.

Threshold (a.v) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

No Impact. The Santa Ana Public Library provides library services to the City. The proposed project would not generate new residents and would not increase the demand for library services. The existing library space, collections, and programs provided are considered adequate for the existing residents and no construction or expansion of facilities would be required. Therefore, no impacts would occur.

Cumulative Impacts

The provision of public services and facilities takes into consideration a larger service area than is associated with a project site. Therefore, the study area is the service area for the respective agencies and districts. Through coordination with the public services and facilities providers, the cumulative needs of the area are considered. The proposed project does not cause the need to construct any new or expand any existing facilities. Therefore, the project would not result in incremental effects to public services or facilities that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. The project would not result in cumulatively considerable impacts to public services or facilities.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.16 Recreation

Threshold (a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Threshold (b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. According to the General Plan, the City has approximately 382 acres of public park and recreation facilities, 283 acres of other open space (golf course) uses, and 19 acres of trails distributed throughout the City. The Santa Ana River and Santiago Creek run through the City and are part of a regional system of open space corridors in Orange County. The proposed project would prohibit the installation of billboards in areas designated for open space or recreation areas. The proposed project would not generate new residents that could require expansion or construction of parks and recreation services. Project implementation would not impact existing facilities and no impacts would occur.

Cumulative Impacts

The proposed project would not result in a significant increased use of recreational facilities or require construction or expansion of existing recreational facilities. Therefore, no cumulative impacts on recreational facilities would result from project implementation.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.17 Transportation

Threshold (a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

No Impact. The volume of automobile and truck traffic associated with project-related construction activities would vary throughout the construction phases as different activities occur. However, project-related construction traffic would be temporary in nature and would cease upon project completion. Therefore, the project would not change traffic distribution over the project lifetime. No changes in traffic operations in the surrounding intersections are anticipated to occur. The project would not affect pedestrian or bicycle facilities. Therefore, project construction and operations would not conflict with an applicable plan, ordinance, or policy concerning the circulation system.

Threshold (b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

No Impact. On December 28, 2018, the California Natural Resources Agency adopted revised State CEQA Guidelines. State CEQA Guidelines Section 15064.3 codifies the removal of vehicle delay and level of service from consideration for transportation impacts under CEQA. With the adopted CEQA Guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT). The City of Santa Ana adopted VMT thresholds in 2019. Small projects that generate fewer than 110 trips per day may generally be assumed to cause a less than significant transportation impact. The proposed project would generate temporary trips during construction; however, trips would cease upon project completion. Trips associated with maintenance and upkeep of billboards would be minimal and less than 110 trips per day. Therefore, no impact would occur and no mitigation measures are required.

Threshold (c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The proposed project would not involve construction of any new roadways and therefore would not propose hazardous design features such as sharp curves or dangerous intersections. The primary concern related to hazardous design is light glare impacting visibility for drivers along freeways. All billboards would comply with the Municipal Code, as amended to address digital billboards with respect to location, orientation, and lighting standards. There are no components of the project that would increase hazards to the public due to incompatible use, as the proposed project is compatible with surrounding non-residential land uses. The proposed project would adhere to all development standards set forth in the proposed Billboards Ordinance and comply with outdoor advertising regulations from Caltrans. Therefore, such impacts are considered less than significant and no mitigation is required.

Threshold (d) Would the project result in inadequate emergency access?

No Impact. Inadequate emergency access may occur if emergency access is obstructed by the project or if new driveways, roadways, or fire truck turnaround areas are insufficient to accommodate the necessary emergency equipment. Project implementation of new billboards, digital conversions, and standard modifications installed pursuant to the proposed Billboards Ordinance would not involve the construction of new driveways, roadways, or fire truck turnaround. The identified Potential Billboard Areas would not permanently obstruct existing sidewalks, driveways, or roads. All existing designated emergency access

routes would remain. Therefore, the project would not result in inadequate emergency access, and no impact would occur.

Cumulative Impacts

The project would not result in either project-specific or cumulatively significant impacts. No mitigation measures would be required. Site access is adequately designed and would not combine with other area traffic impacts to result in significant circulation impacts. Therefore, no project-specific or cumulative impacts would occur.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.18 Tribal Cultural Resources

Threshold (a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant With Mitigation. Chapter 532 Statutes of 2014 (i.e., AB 52) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources." Such resources include "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource." There are no known Native American cultural resources on or within the Potential Billboard Areas. In compliance with PRC Section 21080.3.1(b), the City has provided formal notification to California Native American tribal representatives identified by the California Native American Heritage Commission. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC Section 21074. The City contacted the tribal representatives noted below, and no subsequent correspondence or request for consultation were received.

- Gabrieleño Band of Mission Indians – Kizh Nation, Andrew Salas
- Gabrieleño/Tongva San Gabriel Band of Mission Indians, Anthony Morales
- Gabrieleño/Tongva Nation, Sandonne Goad
- Gabrieleño/Tongva Indians of California Tribal Council, Robert Dorame
- Gabrieleño/Tongva Tribe, Linda Candelaria
- Juaneño Band of Mission Indians Acjachemen Nation, Matias Belardes

The Potential Billboard Areas are within urbanized areas of the City. However, there is the potential for the project to affect previously unidentified Native American tribal cultural resources. Construction activities would include excavation at depths up to 30 feet. MM CR-1 has been identified to mitigate this potential impact to archaeological resources. Compliance with MM CR-1 would mitigate potential impacts to tribal cultural resources to a less than significant level.

Mitigation Program

Standard Conditions and Mitigation Measures

Please refer to Section 4.5, *Cultural Resources*.

4.19 Utilities and Service Systems

Threshold (a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

No Impact. Project implementation would allow for the construction and operation of digital billboards at defined locations within the Potential Billboard Areas. Due to the nature of the proposed project, the proposed project would not generate wastewater, and therefore has no potential to exceed the wastewater treatment requirements of the Regional Water Quality Control Board. No impact would occur.

Threshold (b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

No Impact. The City's water supply comes from groundwater, purchased water from the Metropolitan Water District, and recycled water. Project implementation would not require potable water. The proposed project is not a land use typically associated with water demand or the need for new water services. Therefore, no impact would occur.

Threshold (c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The proposed project would not result in an increase in the demand for wastewater conveyance and treatment facilities. The proposed project is not a land use typically associated with generating wastewater. Existing wastewater treatment capacities would not be impacted by the proposed project. Therefore, no impact would occur.

Threshold (d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. The proposed project would not involve activities or uses capable of generating solid waste. The proposed project does not include any land uses typically associated with solid waste generation such as residential projects for human occupancy. The City would continue to comply with State of California Waste Management Act (AB 939) and other applicable regulations related to waste management. No impact would occur.

Threshold (e) Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The construction and operation of digital billboards are not anticipated to generate a substantial demand for solid waste disposal. Project-related construction activities would generate nominal quantities of solid waste during construction. The proposed project would be required to comply with all applicable solid waste statutes and regulations. Accordingly, the proposed project would not foreseeably conflict with any federal, State, and local statutes and regulations related to solid waste. Impacts would be less than significant impact and no mitigation is required.

Cumulative Impacts

The proposed project would have a less than significant impact with respect to utilities and service systems. The project would not require water and wastewater infrastructure, or generate solid waste during operations. Development of public utility infrastructure is part of an extensive planning process involving utility providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of development and infrastructure plans is intended to ensure that adequate resources are available to serve both individual projects and cumulative demand for resources and infrastructure as a result of cumulative growth and development in the area. Each individual project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility companies would allow for the provision of utility service to the proposed project and other developments. As applicable, the project and other planned projects are subject to connection and service fees to assist in facility expansion and service improvements triggered by an increase in demand. Because of the utility planning and coordination activities described above, no significant cumulative utility impacts would occur associated with project implementation.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the project.

4.20 Wildfire

Threshold (a) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to the CAL FIRE Hazard Severity Zone Map for Orange County, the City is not within a State Responsibility Area. The City, inclusive of all Potential Billboard Areas, are in a Non-Very High Fire Hazard Severity Zone (VHFHSZ) zone within a local responsible area. Further, the proposed project would not require the complete closure of any public or private streets or roadways during construction. Temporary construction activities would not impede use of the road for emergencies or access for emergency response vehicles. Therefore, the project would not result in inadequate emergency access and no impact would occur.

Threshold (b) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As discussed above, the Potential Billboard Areas are not within an area classified as very high fire hazard severity zone. Therefore, no impacts would occur.

Threshold (c) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As discussed above, the Potential Billboard Areas are not within an area classified as very high fire hazard severity zone. The Potential Billboard Areas are bordered by existing development. The proposed project would tie into existing infrastructure that currently serves the project area. Project implementation would not result in the new construction, installation, or maintenance of new infrastructure. No impact would occur.

Threshold (d) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Potential Billboard Areas are not within an area classified as very high fire hazard severity zone. According to the California Geological Survey Earthquake Zones of Required Investigation, the Potential Billboard Areas are not within an area identified as having a potential for landslides. The Potential Billboard Areas and surrounding vicinity are relatively flat. There are no known landslides near the Potential Billboard Areas nor are any Potential Billboard Areas in the path of any known or potential landslides. Therefore, no impacts would occur.

Mitigation Program

Standard Conditions and Mitigation Measures

No standard conditions or mitigation measures are applicable to the proposed project.

4.21 Mandatory Findings of Significance

Threshold (a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. On the basis of the foregoing analysis, the proposed project does not have the potential to significantly degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten or eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The Potential Billboard Areas are bordered by existing development in urban Santa Ana. The proposed project is consistent with the General Plan and the Santa Ana Municipal Code, as amended. Therefore, the project would not have a significant impact on any sensitive, rare, or endangered plant/wildlife community.

Threshold (b) Does the project have possible environmental effects which are individually limited, but cumulatively considerable?

Less Than Significant Impact. The proposed project does not have impacts that are individually limited, but cumulatively considerable. Incremental impacts resulting from development and operation of the proposed project and other cumulative projects that would be under construction include all resource topics except Cultural Resources, Geology and Soils, and Hazards and Hazardous Materials. However, proposed mitigation for Cultural Resources, Geology and Soils, and Hazards and Hazardous Materials would mitigate potential impacts to a less than significant level. When viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects, these impacts are not cumulatively considerable. No cumulative impacts are anticipated in connection with this or other projects. The proposed project complies with long-term regional air quality plans, regional population forecasts, and is within the service capabilities of utility purveyors. No significant adverse environmental impacts have been identified. The analysis contained in this Initial Study evaluated existing conditions, potential impacts associated with the development of the project, and possible environmental cumulative impacts. The project does not have any impact on projected growth or planned projects for the City of Santa Ana or neighboring jurisdictions known as of the date of this analysis.

Threshold (c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. There are no known substantial adverse effects on human beings that would be caused by the proposed project. The environmental evaluation has concluded that no significant environmental impacts will result from the project.

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APPENDIX A

DRAFT OFF-PREMISES COMMERCIAL ADVERTISING SIGNS ORDINANCE

ARTICLE XII. – OFF-PREMISES COMMERCIAL ADVERTISING SIGNS (BILLBOARDS)

DIVISION 1. - GENERAL PROVISIONS

Sec. 41-1100. – Purpose.

The purpose and intent of this Article is to allow:

1. The installation of digital billboards adjacent to freeways in suitable locations;
2. The reconstruction or conversion of existing static freeway-oriented billboards to digital billboards; and
3. The reconstruction or conversion of existing on-premise freeway-oriented advertising signs to digital billboards.

These provisions seek to achieve the following goals:

1. The removal of existing billboards along arterial streets;
2. The construction of new freeway-oriented digital billboards in exchange for specific economic and community benefits as described in this Article;
3. The reconstruction/conversion of freeway-oriented existing static billboards in exchange for specific economic and community benefits as described in this Article;
4. The reconstruction or conversion of existing on-premise freeway-oriented digital signs to off-premise commercial advertising signs;
5. The display of public service announcements; and
6. The generation of revenue for City to fund ongoing services and community needs.

Sec. 41-1101. - Definitions.

As used in this Article, the following words, terms or phrases have the following meanings:

1. *Adjacent (when used to refer to a billboard adjacent to a freeway)* shall mean located within 300 feet of the edge of pavement of a freeway on a parcel having frontage on said freeway and as depicted on maps by the Planning Division.
2. *Arterial Billboard* means an off-premise commercial advertising sign located adjacent to a public street that is not freeway oriented.
3. *Billboard* and *Off-Premise Commercial Advertising Sign* means a sign affixed to the ground as a permanent structure used for the display of off-premise advertising to the public.
4. *Billboard Operating Agreement* means an agreement entered into by and between the City and the billboard operator which will specify terms for fees to

compensate for impacts on City aesthetics and services, including an Economic and Community Benefits Plan, if proposed.

5. *Classified Landscaped Freeway,* when referenced in this Article, refers to a designation applied by the California Department of Transportation (Caltrans) to certain freeway segments which meet the criteria established by the California Code of Regulations Outdoor Advertising Regulations, Title 4, Division 6, and as amended.
6. *Commercial Advertisement* means any advertisement which has, as its primary purpose, the promotion of the sale of goods or services by a commercial business or enterprise to the public generally or any significant part thereof.
7. *Digital Billboard* means a billboard or off-premise commercial advertising sign using technologies, such as LCD (Liquid Crystal Display) and LED (Light-Emitting Diode), to display images and text.
8. *Freeway Corridor* means land located within three hundred (300) feet of the edge of freeway pavement and having frontage on the following freeways: the Santa Ana (I-5) Freeway; the Garden Grove (SR-22) Freeway; and the Costa Mesa (SR-55) Freeway.
9. *Freeway-Oriented* means any billboard that is adjacent to a freeway, designed to be viewed primarily by persons traveling on the main-traveled way of the freeway.
10. *Freeway-Oriented On-Premise Digital Sign (Existing)* means an electronic, digital message display that has been approved by the City of Santa Ana as part of a regional planned sign program pursuant to Section 41-885 of the Santa Ana Municipal Code.
11. *Non-Commercial Advertisement Sign* means any advertisement other than a commercial advertisement, including public service announcements.
12. *Off-Premise Advertisement Sign* means any commercial advertisement other than an on-premise advertisement sign that advertises products or services that are not located, produced, or offered for sale on the subject premise.
13. *On-Premise Advertisement Sign* means any commercial advertisement which pertains solely to goods or services which are produced or offered for sale on the premises where the advertisement is displayed.
14. *Static Billboard* means a billboard or off-premise commercial advertising sign that is not equipped as a digital display.

Sec. 41-1102. - Consistency with the Outdoor Advertising Act.

To the extent that there is any conflict between the provisions of this Article and the provisions of the Outdoor Advertising Act, California Business and Professions Code Sections 5200 et seq., and as amended, the Outdoor Advertising Act shall prevail.

Sec. 41-1103. - Application to Existing Signs.

Any off-premise commercial advertising sign which was constructed in conformance with the requirements of this Article as they existed at the time of such construction, but which is not in conformance with the requirements of this Article, shall be deemed a legal nonconforming use for purposes of this Article, and may be maintained subject to the restrictions and limitations imposed on nonconforming uses by this Chapter. Such signs may be compelled to be removed through amortization subject to the requirements and limitations imposed by Sections 5412 through 5412.4 of the Business and Professions Code of the State of California the provisions of which, as they may from time to time be amended, are incorporated herein by this reference.

Sec. 41-1104. - Fees.

The City Council may, by resolution, establish fees for any or all the administrative processes established by this Article. Every application for a billboard permit or Conditional Use Permit (CUP) or appeal to the Planning Commission or City Council shall be accompanied by a filing fee. No application shall be accepted for filing without the required fee. The City Council shall from time to time by resolution adopt a schedule of fees to be charged.

Sec. 41-1105. - Commercial and Non-commercial Messages.

Nothing in this Article shall be deemed to prohibit or restrict the use of any sign authorized by this Article for any noncommercial message. No permit required for any sign under this Article shall be granted, conditioned, or denied based on the content of the message displayed by such sign, whether such message is commercial or noncommercial in nature.

DIVISION 2. - ADMINISTRATION AND PERMIT PROCEDURES

Sec. 41-1110. – Permit Type and Review Authority

Table 41-1110 below identifies the primary types of development applications, approval process and approval authority for the applications required to permit digital billboards. Applications may be subject to one or more development application processing procedures contained in this Chapter. The exact processing and timing of applications shall be determined by the Planning Division based on the applicable project characteristics.

Table 41-1110 Permit Type and Review Authority

Billboard Type	Permit Type Required	Approving Body	Public Hearing Required
New Digital Billboard	Development Project Plan	Director of PBA	Yes
	Conditional Use Permit	Planning Commission	
	Operating Agreement	City Manager	
Conversion/Reconstruction of Existing Freeway-Oriented Static Billboard	Development Project Plans	Director of PBA	No
	Operating Agreement	City Manager	
Conversion/Reconstruction of Existing Freeway-Oriented On-Premise Sign	Development Project Plan	Director of PBA	Yes
	Conditional Use Permit	Planning Commission	
	Operating Agreement	City Manager	
Relocation of Existing Static or Digital Billboards (1)	Development Project Plan	Director of PBA	Yes
	Conditional Use Permit	Planning Commission	
	Operating Agreement	City Manager	

Notes:

1. If required and permitted by the California Outdoor Advertising Act, as amended from time to time.

Appeals from decisions of the Director of the Planning and Building Agency and/or Planning Commission, extensions, time limits, and modifications to such digital billboard approval must be conducted in a manner in accordance with Article V, Division 1 of this Chapter.

Sec. 41-1111. – Application Requirements

Every application for the construction a new digital billboard, conversion/reconstruction of an existing freeway-oriented static billboard, or conversion/reconstruction of an existing freeway oriented on-premise advertising sign to a digital billboard shall be filed by, or with the written consent of, the property owner on forms required by the Planning Division and shall be at a minimum accompanied by the following information:

1. A pictorial representation of, and other information about, the proposed digital billboard, disclosing overall dimensions, dimensions of letters and figures, colors, materials, copy, and illumination characteristics.
2. A plan of the site on which the proposed digital billboard is to be located, indicating the precise location of the billboard, existing and proposed landscaping, other site improvements, and proximity to the edge of pavement of an adjacent freeway.
3. A vicinity map depicting the location of all existing and proposed billboards, any landmarks as designated on the General Plan that are within one thousand (1,000) feet of the proposed digital billboard, and the zoning designation of all sites within five hundred (500) feet of the boundaries of the subject property.
4. Photo simulations of all proposed digital billboards showing daytime and nighttime conditions.
5. A three-dimensional (3D) massing study depicting proposed digital billboard. The 3D study should include massing of proposed development, if any, on applicant's parcel as well as existing buildings and advertising signs within one thousand (1,000) feet of the proposed digital billboard.
6. If the application involves the exchange of existing billboards, provide a map depicting the location(s) of billboards to be removed; at least two photos of each billboard to be removed; and a summary of the size of each billboard face to be removed.
7. Such other information as the Executive Director of the Planning and Building Agency deems appropriate to determine compliance with the provisions of this Article.

Sec. 41-1112. – Digital Billboard Conditional Use Permit Findings of Approval

The Planning Commission shall make the following findings of fact set forth in this Section and not upon the standards set forth in Section 41-638 of this Chapter, and may impose conditions, restrictions or limitations as the commission deems necessary to meet the general purpose and intent of this Article and to ensure that the public health, safety and welfare are being maintained. Findings of Approval shall be made, and conditions may be imposed to confirm that:

1. The proposed digital billboard shall not constitute a hazard to the safe and efficient operation of vehicles upon a freeway.
2. Adequate space exists between the proposed digital billboard and any existing billboards in the vicinity, thus avoiding or minimizing any negative aesthetic impacts to surrounding land uses.
3. The size and design of the digital billboard will not be out of context with its visual environment.
4. The digital billboard will not cause light and glare to intrude upon residential uses, including those in mixed-use districts or developments.
5. The digital billboard will not significantly block or impair views of landmarks identified in the City's General Plan.
6. The installation of the new digital billboard will result in significant economic and community benefits.

Sec. 41-1113. - Operating Agreement Required; Execution fee required.

Prior to issuance of any building permits to reconstruct an existing static billboard, or prior to the public hearing notice to consider construction of a new digital billboard or conversion/reconstruction of an existing freeway oriented on-premise sign to a digital billboard, the applicant shall submit to the City Manager an executed Billboard Operating Agreement that has been reviewed and approved by the City Attorney and the Executive Director of the Planning and Building Agency. The applicant shall be responsible for paying any fees that have been established by the City Council to process and execute the Billboard Operating Agreement. In approving such agreement, the City Manager must find that the agreement will confer a substantial public benefit to the City and to the general public. Such public benefits may include, without limitation: the removal of legal nonconforming billboards; minimum display percentages or times for the advertising of City events and public service announcements; public art programming; physical site improvements; automatic brightness reductions or automatic display shutoffs due to proximity to sensitive land uses; minimum advertising of goods, products, or services provided onsite; or monetary contribution intended for streetscape amenities or publicly accessible open space that enhances the quality and comfort of the pedestrian experience, and/or financial contributions to the City with the intent to achieve the same results.

DIVISION 3. – DEVELOPMENT, LIGHTING AND OPERATIONAL STANDARDS

Sec. 41-1130. – Permitted Locations.

New and reconstructed billboards, and the conversion of existing freeway oriented on-premise advertisement signs to a digital billboard, shall comply with the following locational standards:

1. Shall only be constructed on properties zoned and used for non-residential uses in any zoning district, including overlay zones, specific plans, and specific development zones. Such requirement may be modified by the Planning Commission through the approval of a Conditional Use Permit.
2. Shall be located within the Freeway Corridor as defined in Section 41-1101.
3. Shall not be located within five hundred (500) feet from any residentially zoned parcel, as measured from the border of the digital billboard face, or the base of the digital billboard structure, to the nearest property line of the residentially zoned property. Such requirement may be modified to be no less than one-hundred fifty (150) feet for mixed-use districts by the Planning Commission through the approval of a Conditional Use Permit
4. Shall be located outside any right-of-way owned by the California Department of Transportation (Caltrans).
5. Shall not significantly block or significantly impair views of any landmark identified in the General Plan.

Sec. 41-1131. – Development Standards.

1. All digital billboards shall comply with standards established by the California Department of Transportation (Caltrans) in effect at the time the permit is issued. These standards may prohibit the construction of digital billboards in landscaped areas and/or in zones where residential uses are permitted; may limit the size and height of digital billboards; and may require separation between billboards, among other provisions.
2. All new or reconstructed billboards shall be digital billboards. The construction or reconstruction of static billboards is prohibited.
3. The development standards in Table 41-1131 shall be applicable to all new and reconstructed billboards.

Table 41-1131 Digital Billboard Development Standards

Standard	
Maximum Sign Area/Face	As allowed by Caltrans
Maximum Number of Faces	Two (2)
Maximum Height	60 feet(1)
Spacing Between Billboards	1,000 feet (2)
Number of Vertical Supports	One Vertical Support (3)
Notes: 1. Measured from nearest adjacent curb level on the site on which the sign is constructed. May be modified through Planning Commission approval of a Conditional Use Permit.	

2. The minimum separation between billboards shall be one-thousand (1,000) feet (including static billboards) or standards established by the Caltrans in effect at the time the permit is issued, whichever is greater, as measured from the base of each billboard's vertical support.
3. All conduits, cables and appurtenances shall be concealed within the vertical support.

Sec. 41-1132. – Design Standards

1. The words "Santa Ana" shall permanently appear on the billboard structure in a size large enough to be visible to drivers using the freeway. The precise location, size and font of the words shall be determined by the approval authority.
2. All ground-mounted equipment shall be screened from view at street level. The entire site occupied by the billboard shall be appropriately landscaped with groundcover and shrubs to the satisfaction of the approval authority.
3. Each freeway billboard must be oriented primarily for viewing from the freeway and shall be oriented, and adequately shielded if necessary, to prevent the trespass of light and glare upon any residential land use, including those in mixed-use districts, as exists on the date of building permit issuance.
4. The billboard shall utilize an innovative billboard format, shall creatively use the latest in technology to ensure digital image quality, and shall use innovative architectural features and materials.
5. All billboards shall plainly display, and be visible from no less than fifty (50) feet, the name of the person or company owning or maintaining such billboard, contact information for said person or company, and the billboard's identification number.
6. Billboards projecting over a driveway or drive aisle shall have a minimum clearance of 20 feet between the lowest point of the sign and the driveway grade.
7. No part of any billboard shall cross onto an adjacent property.
8. Billboards projecting over a pedestrian walkway shall have a minimum clearance of twelve (12) feet between the lowest point of the sign and the walkway grade.
9. All billboards not projecting over drive areas or pedestrian walkways shall have a minimum clearance of twelve (12) feet between the lowest point of the billboard and ground level.

Sec. 41-1133. – Lighting and Display Requirements

1. Signs shall produce a maximum 0.3 foot-candles over ambient light levels.
2. The display brightness shall be controlled by a photocell or light sensor that adjusts the brightness to the required level based on ambient light conditions without the need for human input. Use of other brightness adjustment methods, such as timer- or calendar-based systems, shall only be used as a backup system.

3. The display shall be factory-certified as capable of complying with the above brightness standards. Such certification shall be provided to the satisfaction of the Executive Director of the Planning and Building Agency, or his/her designee.
4. The sign owner shall provide to the City, upon request, certification by or compensation for an independent contractor to verify that the brightness levels of the digital billboard are in compliance with the requirements of this Section.
5. All signs shall be equipped with a control system that, in the event of a display or control malfunction, "freezes" the display on either a single, unchanging message, or a blank screen. An emergency shutoff switch shall be provided.
6. Any sign area not comprising the digital display panel is prohibited. This area includes, but is not limited to, static sign area, appendages, cutout letters, and figures. A frame surrounding the display panel up to twelve (12) inches in width shall be permitted; it shall not contain any sign copy or graphics, and shall not count toward the sign area.
7. Where screen transitions are used, such transitions shall not give the appearance of moving text or images. The sign copy shall not use flashing, intermittent or moving lights or produce the optical illusion of movement or use animation.
8. Each sign copy shall be displayed for a minimum of four (4) seconds. The still images may not move or present the appearance of motion and may not use flashing, scintillating, blinking, or traveling lights or any other means not providing constant illumination. Transition or blank screen time between one still image and the next may not exceed one (1) second.
9. All digital billboards must comply with all applicable laws and regulations concerning brightness, including, without limitation, California Vehicle Code Section 21466.5, and as amended.
10. All digital billboards must provide sufficient time for public service announcements as set forth in the approved Operating Agreement. Such public service announcements may not be concentrated during non-peak hours and must be evenly dispersed throughout peak hours so as to maximize their benefit for the community and passer-by traffic.

Sec. 41-1134. – Prohibited Features

Freeway oriented billboards shall not contain any of the following features:

1. Moving parts.
2. Appendages, cutout letters, or figures that protrude beyond the flat surface of the sign face.
3. Lights that flash, shimmer, glitter or give the appearance of flashing, shimmering or glittering. Exceptions to this restriction include time, temperature and smog index units.

4. Walls or screens at the base of the sign which create a hazard to public safety or provide an attractive nuisance.
5. Copy which simulates any traffic sign in a manner which confuses the public.
6. Copy which duplicates any other content displayed on the sign.
7. Devices which emit audible sound, or odor or particulate matter.

Sec. 41-1125. – Maintenance and Monitoring.

1. No person shall allow any digital billboard located on property owned, occupied or controlled by such person to remain in a condition of disrepair for a period of more than fifteen (15) days. For purposes of this article, a billboard shall be deemed to be in a condition of disrepair if it is in need of replacement of defective or missing parts, has a broken or damaged sign face, or is in need of repainting or cleaning in order to be brought into a reasonably slightly and legible condition.
2. All billboard operators shall submit a Lighting Monitoring Report to the Planning Division upon installation, and at three-year intervals thereafter to confirm conformance with the lighting requirements set forth in this Article.
3. Complaints about lighting will be investigated by the City, and if determined necessary by the Executive Director of the Planning and Building Agency, the billboard operator shall provide an updated Lighting Monitoring Report within 72 hours of the notice from the City. The City shall reserve the right to conduct digital billboard lighting measurements. If the measured luminance and/or illuminance exceed the data presented in operator's Lighting Monitoring Report, the findings of the City report shall prevail. All cost shall be borne by the applicant/operator.

DIVISION 4. - BILLBOARD EXCHANGE PROGRAM.

Sec. 41-1140. – Applicability

No building permit shall be issued for any new digital billboard, conversion/reconstruction of an existing freeway oriented static billboard, or conversion/reconstruction of an existing on-premise advertising sign to a digital billboard, until the removal ratios as required by the Operating Agreement pursuant to Section 41-1113 of this Article have been met by applicant. In addition, the following standards are shall apply:

1. Nonconforming billboards with more than one face shall be removed in their entirety and shall not be altered or partially dismantled in such a way as to leave behind one or more faces or portion(s) thereof.
2. No billboard shall be reduced in size or otherwise altered to provide for the required removal, and only whole, entire billboard(s) shall be removed. In no case shall less than the required amount of display surface area be removed.

3. Any billboard removed or demolished from within the City, or reduced in size, not in conjunction with a project requiring removal under this Article, shall not be credited toward the removal requirements of Section.
4. Billboards shall be removed with the following priority, in order of highest priority to lowest:
    a. Nonconforming billboards located on properties used for residential purposes or zoned for residential use.
    b. Nonconforming billboards not located adjacent to a street classified as a Freeway, Principal, Major Arterial, Primary Arterial and Secondary Arterial as defined by the Santa Ana Circulation Element; with the exception of those billboards located in Downtown Santa Ana.
    c. All other nonconforming billboards.

5. The City may allow the applicant to post a bond guaranteeing removal of the existing billboards prior to issuing permits for the applicable digital billboard in the freeway corridor.

Sec. 41-1142. Overriding Economic and Community Benefit Considerations For Billboard Removal Exchange Ratio Reduction.

The billboard removal ratio as required pursuant to Section 41-1143 of this Article may be reduced subject to demonstration of overriding economic and community benefits as proposed in an Economic and Community Benefits Plan attached to and incorporated in a Billboard Operating Agreement as specified in Section 41-1113 of this chapter, subject to the satisfaction of the City Manager.

Section 3. Division 3 of Article 5 of Chapter 41 of the Santa Ana Municipal Code is hereby amended to read as follows:

Sec. 41-668. - Definitions.

(a) *Development project.* As used in this division, the term "development project" includes any of the following projects:

(1) The new construction of any building or buildings, and additions to any existing building or buildings, if new floor space of two thousand five hundred (2,500) square feet or more is constructed or added; but excluding the following:

a. Single family homes;

b. Room additions to duplexes;

c. Tenant improvements not involving a change of use;

d. Facade improvements;

e. Equipment covers or structures to cover equipment.

(2) Tenant improvements involving an intensification or change in occupancy classification.

(3) Any project that requires a discretionary approval, excluding conditional use permits for operation of eating establishments between the hours of 12:00 a.m. and 5:00 a.m. and conditional use permits for the sale of alcoholic beverages.

(4) Construction of new digital billboards, conversion of an existing static billboard within to a digital billboard, conversion/reconstruction of existing on-premise digital signs, and relocation of billboards.

(b) Discretionary approval. As used in this division, the term "discretionary approval" means a conditional use permit, variance, minor exception, tentative map approval, change in use district designation, or similar entitlement for development, the granting of which involves the exercise of discretion, other than the plan approval process set forth in this division.

APPENDIX B

AIR QUALITY AND GREENHOUSE GAS EMISSIONS DATA

Santa Ana Billboards

Orange County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	1.00	User Defined Unit	1.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	30
Climate Zone	8			**Operational Year**	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - one new billboard/digital conversion

Construction Phase - billboard construction/digital conversion

Off-road Equipment - billboard construction/conversion equipment

Trips and VMT - typical worker ,vendor, hauling trips

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	100.00	5.00
tblConstructionPhase	PhaseEndDate	11/4/2020	6/24/2020

tblLandUse	LotAcreage	0.00	1.00
tblOffRoadEquipment	LoadFactor	0.50	0.50
tblOffRoadEquipment	OffRoadEquipmentType		Bore/Drill Rigs
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblTripsAndVMT	HaulingTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	0.00	12.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	0.6903	8.4576	4.2910	0.0172	0.1864	0.2736	0.4600	0.0504	0.2518	0.3022	0.0000	1,695.1754	1,695.1754	0.4545	0.0000	1,706.5373
Maximum	**0.6903**	**8.4576**	**4.2910**	**0.0172**	**0.1864**	**0.2736**	**0.4600**	**0.0504**	**0.2518**	**0.3022**	**0.0000**	**1,695.1754**	**1,695.1754**	**0.4545**	**0.0000**	**1,706.5373**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e

Year	lb/day										lb/day					
2020	0.6903	8.4576	4.2910	0.0172	0.1864	0.2736	0.4600	0.0504	0.2518	0.3022	0.0000	1,695.1754	1,695.1754	0.4545	0.0000	1,706.5373
Maximum	**0.6903**	**8.4576**	**4.2910**	**0.0172**	**0.1864**	**0.2736**	**0.4600**	**0.0504**	**0.2518**	**0.3022**	**0.0000**	**1,695.1754**	**1,695.1754**	**0.4545**	**0.0000**	**1,706.5373**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Building Construction	Building Construction	6/18/2020	6/24/2020	5	5	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Building Construction	Bore/Drill Rigs	1	8.00	221	0.50
Building Construction	Generator Sets	0	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	0	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	0	6.00	97	0.37
Building Construction	Welders	0	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	2	12.00	6.00	4.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6190	7.5835	3.6777	0.0138		0.2687	0.2687		0.2472	0.2472		1,333.4481	1,333.4481	0.4313		1,344.2297
Total	**0.6190**	**7.5835**	**3.6777**	**0.0138**		**0.2687**	**0.2687**		**0.2472**	**0.2472**		**1,333.4481**	**1,333.4481**	**0.4313**		**1,344.2297**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	6.0400e-003	0.2200	0.0556	6.1000e-004	0.0139	7.1000e-004	0.0146	3.8100e-003	6.8000e-004	4.4900e-003		68.2446	68.2446	7.0700e-003		68.4215
Vendor	0.0192	0.6251	0.1650	1.4900e-003	0.0383	3.2600e-003	0.0416	0.0110	3.1200e-003	0.0142		162.6774	162.6774	0.0132		163.0063

Worker	0.0461	0.0291	0.3928	1.3100e-003	0.1341	8.9000e-004	0.1350	0.0356	8.2000e-004	0.0364		130.8052	130.8052	2.9800e-003		130.8798
Total	**0.0713**	**0.8741**	**0.6134**	**3.4100e-003**	**0.1864**	**4.8600e-003**	**0.1913**	**0.0504**	**4.6200e-003**	**0.0550**		**361.7272**	**361.7272**	**0.0232**		**362.3076**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6190	7.5835	3.6777	0.0138		0.2687	0.2687		0.2472	0.2472	0.0000	1,333.4481	1,333.4481	0.4313		1,344.2297
Total	**0.6190**	**7.5835**	**3.6777**	**0.0138**		**0.2687**	**0.2687**		**0.2472**	**0.2472**	**0.0000**	**1,333.4481**	**1,333.4481**	**0.4313**		**1,344.2297**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	6.0400e-003	0.2200	0.0556	6.1000e-004	0.0139	7.1000e-004	0.0146	3.8100e-003	6.8000e-004	4.4900e-003		68.2446	68.2446	7.0700e-003		68.4215
Vendor	0.0192	0.6251	0.1650	1.4900e-003	0.0383	3.2600e-003	0.0416	0.0110	3.1200e-003	0.0142		162.6774	162.6774	0.0132		163.0063
Worker	0.0461	0.0291	0.3928	1.3100e-003	0.1341	8.9000e-004	0.1350	0.0356	8.2000e-004	0.0364		130.8052	130.8052	2.9800e-003		130.8798
Total	**0.0713**	**0.8741**	**0.6134**	**3.4100e-003**	**0.1864**	**4.8600e-003**	**0.1913**	**0.0504**	**4.6200e-003**	**0.0550**		**361.7272**	**361.7272**	**0.0232**		**362.3076**

Santa Ana Billboards

Orange County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	1.00	User Defined Unit	1.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	30
Climate Zone	8			**Operational Year**	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - one new billboard/digital conversion

Construction Phase - billboard construction/digital conversion

Off-road Equipment - billboard construction/conversion equipment

Trips and VMT - typical worker ,vendor, hauling trips

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	100.00	5.00
tblConstructionPhase	PhaseEndDate	11/4/2020	6/24/2020

tblLandUse	LotAcreage	0.00	1.00
tblOffRoadEquipment	LoadFactor	0.50	0.50
tblOffRoadEquipment	OffRoadEquipmentType		Bore/Drill Rigs
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblTripsAndVMT	HaulingTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	0.00	12.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	0.6973	8.4630	4.2801	0.0171	0.1864	0.2736	0.4600	0.0504	0.2519	0.3023	0.0000	1,683.1367	1,683.1367	0.4551	0.0000	1,694.5155
Maximum	**0.6973**	**8.4630**	**4.2801**	**0.0171**	**0.1864**	**0.2736**	**0.4600**	**0.0504**	**0.2519**	**0.3023**	**0.0000**	**1,683.1367**	**1,683.1367**	**0.4551**	**0.0000**	**1,694.5155**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e

Year	lb/day										lb/day					
2020	0.6973	8.4630	4.2801	0.0171	0.1864	0.2736	0.4600	0.0504	0.2519	0.3023	0.0000	1,683.1367	1,683.1367	0.4551	0.0000	1,694.5155
Maximum	**0.6973**	**8.4630**	**4.2801**	**0.0171**	**0.1864**	**0.2736**	**0.4600**	**0.0504**	**0.2519**	**0.3023**	**0.0000**	**1,683.1367**	**1,683.1367**	**0.4551**	**0.0000**	**1,694.5155**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Building Construction	Building Construction	6/18/2020	6/24/2020	5	5	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Building Construction	Bore/Drill Rigs	1	8.00	221	0.50
Building Construction	Generator Sets	0	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	0	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	0	6.00	97	0.37
Building Construction	Welders	0	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	2	12.00	6.00	4.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6190	7.5835	3.6777	0.0138		0.2687	0.2687		0.2472	0.2472		1,333.4481	1,333.4481	0.4313		1,344.2297
Total	**0.6190**	**7.5835**	**3.6777**	**0.0138**		**0.2687**	**0.2687**		**0.2472**	**0.2472**		**1,333.4481**	**1,333.4481**	**0.4313**		**1,344.2297**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	6.1900e-003	0.2227	0.0585	6.0000e-004	0.0139	7.3000e-004	0.0147	3.8100e-003	6.9000e-004	4.5100e-003		67.2144	67.2144	7.2400e-003		67.3955
Vendor	0.0200	0.6249	0.1808	1.4600e-003	0.0383	3.3200e-003	0.0417	0.0110	3.1700e-003	0.0142		158.6796	158.6796	0.0138		159.0252

Worker	0.0521	0.0319	0.3630	1.2400e-003	0.1341	8.9000e-004	0.1350	0.0356	8.2000e-004	0.0364		123.7945	123.7945	2.8200e-003		123.8652
Total	**0.0783**	**0.8795**	**0.6024**	**3.3000e-003**	**0.1864**	**4.9400e-003**	**0.1913**	**0.0504**	**4.6800e-003**	**0.0551**		**349.6886**	**349.6886**	**0.0239**		**350.2858**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6190	7.5835	3.6777	0.0138		0.2687	0.2687		0.2472	0.2472	0.0000	1,333.4481	1,333.4481	0.4313		1,344.2297
Total	**0.6190**	**7.5835**	**3.6777**	**0.0138**		**0.2687**	**0.2687**		**0.2472**	**0.2472**	**0.0000**	**1,333.4481**	**1,333.4481**	**0.4313**		**1,344.2297**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	6.1900e-003	0.2227	0.0585	6.0000e-004	0.0139	7.3000e-004	0.0147	3.8100e-003	6.9000e-004	4.5100e-003		67.2144	67.2144	7.2400e-003		67.3955
Vendor	0.0200	0.6249	0.1808	1.4600e-003	0.0383	3.3200e-003	0.0417	0.0110	3.1700e-003	0.0142		158.6796	158.6796	0.0138		159.0252
Worker	0.0521	0.0319	0.3630	1.2400e-003	0.1341	8.9000e-004	0.1350	0.0356	8.2000e-004	0.0364		123.7945	123.7945	2.8200e-003		123.8652
Total	**0.0783**	**0.8795**	**0.6024**	**3.3000e-003**	**0.1864**	**4.9400e-003**	**0.1913**	**0.0504**	**4.6800e-003**	**0.0551**		**349.6886**	**349.6886**	**0.0239**		**350.2858**

Santa Ana Billboards - Orange County, Annual

Santa Ana Billboards

Orange County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	1.00	User Defined Unit	1.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	30
Climate Zone	8			**Operational Year**	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - one new billboard/digital conversion

Construction Phase - billboard construction/digital conversion

Off-road Equipment - billboard construction/conversion equipment

Trips and VMT - typical worker ,vendor, hauling trips

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	100.00	5.00
tblConstructionPhase	PhaseEndDate	11/4/2020	6/24/2020

tblLandUse	LotAcreage	0.00	1.00
tblOffRoadEquipment	LoadFactor	0.50	0.50
tblOffRoadEquipment	OffRoadEquipmentType		Bore/Drill Rigs
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblTripsAndVMT	HaulingTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	WorkerTripNumber	0.00	12.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	1.7300e-003	0.0212	0.0107	4.0000e-005	4.6000e-004	6.8000e-004	1.1400e-003	1.2000e-004	6.3000e-004	7.5000e-004	0.0000	3.8282	3.8282	1.0300e-003	0.0000	3.8540
Maximum	**1.7300e-003**	**0.0212**	**0.0107**	**4.0000e-005**	**4.6000e-004**	**6.8000e-004**	**1.1400e-003**	**1.2000e-004**	**6.3000e-004**	**7.5000e-004**	**0.0000**	**3.8282**	**3.8282**	**1.0300e-003**	**0.0000**	**3.8540**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e

Year	tons/yr										MT/yr					
2020	1.7300e-003	0.0212	0.0107	4.0000e-005	4.6000e-004	6.8000e-004	1.1400e-003	1.2000e-004	6.3000e-004	7.5000e-004	0.0000	3.8282	3.8282	1.0300e-003	0.0000	3.8540
Maximum	**1.7300e-003**	**0.0212**	**0.0107**	**4.0000e-005**	**4.6000e-004**	**6.8000e-004**	**1.1400e-003**	**1.2000e-004**	**6.3000e-004**	**7.5000e-004**	**0.0000**	**3.8282**	**3.8282**	**1.0300e-003**	**0.0000**	**3.8540**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	6-1-2020	8-31-2020	0.0229	0.0229
		Highest	0.0229	0.0229

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Building Construction	Building Construction	6/18/2020	6/24/2020	5	5	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Building Construction	Bore/Drill Rigs	1	8.00	221	0.50
Building Construction	Generator Sets	0	8.00	84	0.74

Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	0	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	0	6.00	97	0.37
Building Construction	Welders	0	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	2	12.00	6.00	4.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.5500e-003	0.0190	9.1900e-003	3.0000e-005		6.7000e-004	6.7000e-004		6.2000e-004	6.2000e-004	0.0000	3.0242	3.0242	9.8000e-004	0.0000	3.0487
Total	**1.5500e-003**	**0.0190**	**9.1900e-003**	**3.0000e-005**		**6.7000e-004**	**6.7000e-004**		**6.2000e-004**	**6.2000e-004**	**0.0000**	**3.0242**	**3.0242**	**9.8000e-004**	**0.0000**	**3.0487**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e

Category	tons/yr										MT/yr					
Hauling	2.0000e-005	5.7000e-004	1.4000e-004	0.0000	3.0000e-005	0.0000	4.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.1538	0.1538	2.0000e-005	0.0000	0.1542
Vendor	5.0000e-005	1.5900e-003	4.3000e-004	0.0000	9.0000e-005	1.0000e-005	1.0000e-004	3.0000e-005	1.0000e-005	4.0000e-005	0.0000	0.3651	0.3651	3.0000e-005	0.0000	0.3659
Worker	1.2000e-004	8.0000e-005	9.3000e-004	0.0000	3.3000e-004	0.0000	3.3000e-004	9.0000e-005	0.0000	9.0000e-005	0.0000	0.2851	0.2851	1.0000e-005	0.0000	0.2852
Total	**1.9000e-004**	**2.2400e-003**	**1.5000e-003**	**0.0000**	**4.5000e-004**	**1.0000e-005**	**4.7000e-004**	**1.3000e-004**	**1.0000e-005**	**1.4000e-004**	**0.0000**	**0.8040**	**0.8040**	**6.0000e-005**	**0.0000**	**0.8053**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.5500e-003	0.0190	9.1900e-003	3.0000e-005		6.7000e-004	6.7000e-004		6.2000e-004	6.2000e-004	0.0000	3.0242	3.0242	9.8000e-004	0.0000	3.0487
Total	**1.5500e-003**	**0.0190**	**9.1900e-003**	**3.0000e-005**		**6.7000e-004**	**6.7000e-004**		**6.2000e-004**	**6.2000e-004**	**0.0000**	**3.0242**	**3.0242**	**9.8000e-004**	**0.0000**	**3.0487**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.0000e-005	5.7000e-004	1.4000e-004	0.0000	3.0000e-005	0.0000	4.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.1538	0.1538	2.0000e-005	0.0000	0.1542
Vendor	5.0000e-005	1.5900e-003	4.3000e-004	0.0000	9.0000e-005	1.0000e-005	1.0000e-004	3.0000e-005	1.0000e-005	4.0000e-005	0.0000	0.3651	0.3651	3.0000e-005	0.0000	0.3659

Worker	1.2000e-004	8.0000e-005	9.3000e-004	0.0000	3.3000e-004	0.0000	3.3000e-004	9.0000e-005	0.0000	9.0000e-005	0.0000	0.2851	0.2851	1.0000e-005	0.0000	0.2852
Total	**1.9000e-004**	**2.2400e-003**	**1.5000e-003**	**0.0000**	**4.5000e-004**	**1.0000e-005**	**4.7000e-004**	**1.3000e-004**	**1.0000e-005**	**1.4000e-004**	**0.0000**	**0.8040**	**0.8040**	**6.0000e-005**	**0.0000**	**0.8053**

Lighting GHG and Energy Calculation	
Watts	7,500
Hours	24
Days	365
Total Watts/year	65,700,000
kWh/year	65700
MWh/year	65.7

GHG	SCE Carbon Intensity (lbs/MWh)	Emissions		
		Pounds	Metric Tons	CO_2e
CO_2	546.44	35901.11	16.28446974	16.28447
CH_4	0.029	1.9053	0.00086423	0.021606
N_2O	0.00617	0.405369	0.000183872	0.054794
Total				**16.36087**

APPENDIX C

NATIVE AMERICAN TRIBAL CONSULTATION CORRESPONDENCE

CITY OF SANTA ANA
PLANNING AND BUILDING AGENCY
20 Civic Center Plaza ● P.O. Box 1988
Santa Ana, California 92702
www.santa-ana.org

May 7, 2020

Tribal Chair Robert F. Dorame
Gabrielino Tongva Indians of California Tribal Council
P.O. Box 490
Bellflower, CA 90707

RE: INVITATION TO CONSULT PER ASSEMBLY BILL 52 NOTIFICATION – CITY OF SANTA ANA

Dear Tribal Chair Dorame,

This letter is to formally invite you to request consultation pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) regarding a proposed project in the city of Santa Ana. Pursuant to California Public Resources Code (PRC) Section 21080.3.1(b), the Gabrielino Tongva Indians of California Tribal Council has submitted a request for notification of preparation of an environmental impact report (EIR), negative declaration (ND), or mitigated negative declaration (MND) for projects that are within the geographic area traditionally and culturally affiliated with this tribe. California Native American Tribes may request consultation regarding possible significant effects that implementation of the proposed project may have on tribal cultural resources. A request must be in writing to the City of Santa Ana and must identify a lead contact person. If consultation is requested, the City of Santa Ana will begin the consultation process within 30 days.

The City of Santa Ana is proposing the adoption of a Sign Ordinance as a part of the Municipal Code to allow digital billboards along the freeway frontages. The City is evaluating Potential Billboard Areas located on properties zoned for commercial or industrial uses along portions of State Route 55 (SR-55), SR-22, and Interstate 5 (I-5). Exhibit 1 depicts the six Potential Billboard Areas.

The City of Santa Ana is committed to fulfilling the goals of AB52 and believes that tribal participation in the planning process is crucial. The intent of consultation is to provide an opportunity for local governments and interested tribes to work together early in the

planning process toward the protection of Native American cultural places and resources that might not appear on cultural resource registries. This is an opportunity for your tribe to participate in the process for this project.

Figures showing the location of the project and the proposed site plan are attached to assist you in deciding whether or not to consult with the City about the proposed project. Under AB52, a Request for Consultation about the project must be made within thirty (30) days of this notice. If your tribe provides information during consultation process, any sensitive information shared with the City regarding cultural places and/or sacred sites will be kept strictly confidential and will not be divulged to the public.

If your tribe would like to consult pursuant to AB52 about the proposed project, please contact me by phone at (714) 647-5481 or by email at JGuevara@santa-ana.org.

Sincerely,

Jerry Guevara
Assistant Planner I

AB 52 Notification
5/7/2020

CITY OF SANTA ANA
PLANNING AND BUILDING AGENCY
20 Civic Center Plaza ● P.O. Box 1988
Santa Ana, California 92702
www.santa-ana.org

May 7, 2020

Co-Chairperson Linda Candelaria
Gabrielino-Tongva Tribe
1999 Avenue of the Stars, Suite 1100
Los Angeles, CA 90067

RE: INVITATION TO CONSULT PER ASSEMBLY BILL 52 NOTIFICATION – CITY OF SANTA ANA

Dear Co-Chairperson Candelaria,

This letter is to formally invite you to request consultation pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) regarding a proposed project in the city of Santa Ana. Pursuant to California Public Resources Code (PRC) Section 21080.3.1(b), the Gabrielino-Tongva Tribe has submitted a request for notification of preparation of an environmental impact report (EIR), negative declaration (ND), or mitigated negative declaration (MND) for projects that are within the geographic area traditionally and culturally affiliated with this tribe. California Native American Tribes may request consultation regarding possible significant effects that implementation of the proposed project may have on tribal cultural resources. A request must be in writing to the City of Santa Ana and must identify a lead contact person. If consultation is requested, the City of Santa Ana will begin the consultation process within 30 days.

The City of Santa Ana is proposing the adoption of a Sign Ordinance as a part of the Municipal Code to allow digital billboards along the freeway frontages. The City is evaluating Potential Billboard Areas located on properties zoned for commercial or industrial uses along portions of State Route 55 (SR-55), SR-22, and Interstate 5 (I-5). Exhibit 1 depicts the six Potential Billboard Areas.

The City of Santa Ana is committed to fulfilling the goals of AB52 and believes that tribal participation in the planning process is crucial. The intent of consultation is to provide an opportunity for local governments and interested tribes to work together early in the

planning process toward the protection of Native American cultural places and resources that might not appear on cultural resource registries. This is an opportunity for your tribe to participate in the process for this project.

Figures showing the location of the project and the proposed site plan are attached to assist you in deciding whether or not to consult with the City about the proposed project. Under AB52, a Request for Consultation about the project must be made within thirty (30) days of this notice. If your tribe provides information during consultation process, any sensitive information shared with the City regarding cultural places and/or sacred sites will be kept strictly confidential and will not be divulged to the public.

If your tribe would like to consult pursuant to AB52 about the proposed project, please contact me by phone at (714) 647-5481 or by email at JGuevara@santa-ana.org.

Sincerely,

Jerry Guevara
Assistant Planner I

AB 52 Notification
5/7/2020

CITY OF SANTA ANA
PLANNING AND BUILDING AGENCY
20 Civic Center Plaza ● P.O. Box 1988
Santa Ana, California 92702
www.santa-ana.org

May 7, 2020

Chairperson Sandonne Goad
Gabrieleno/Tongva Nation
106 ½ Judge John Aiso St., #231
Los Angeles, CA 90012

RE: INVITATION TO CONSULT PER ASSEMBLY BILL 52 NOTIFICATION – CITY OF SANTA ANA

Dear Chairperson Goad,

This letter is to formally invite you to request consultation pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) regarding a proposed project in the city of Santa Ana. Pursuant to California Public Resources Code (PRC) Section 21080.3.1(b), the Gabrieleno/Tongva Nation has submitted a request for notification of preparation of an environmental impact report (EIR), negative declaration (ND), or mitigated negative declaration (MND) for projects that are within the geographic area traditionally and culturally affiliated with this tribe. California Native American Tribes may request consultation regarding possible significant effects that implementation of the proposed project may have on tribal cultural resources. A request must be in writing to the City of Santa Ana and must identify a lead contact person. If consultation is requested, the City of Santa Ana will begin the consultation process within 30 days.

The City of Santa Ana is proposing the adoption of a Sign Ordinance as a part of the Municipal Code to allow digital billboards along the freeway frontages. The City is evaluating Potential Billboard Areas located on properties zoned for commercial or industrial uses along portions of State Route 55 (SR-55), SR-22, and Interstate 5 (I-5). Exhibit 1 depicts the six Potential Billboard Areas.

The City of Santa Ana is committed to fulfilling the goals of AB52 and believes that tribal participation in the planning process is crucial. The intent of consultation is to provide an opportunity for local governments and interested tribes to work together early in the

planning process toward the protection of Native American cultural places and resources that might not appear on cultural resource registries. This is an opportunity for your tribe to participate in the process for this project.

Figures showing the location of the project and the proposed site plan are attached to assist you in deciding whether or not to consult with the City about the proposed project. Under AB52, a Request for Consultation about the project must be made within thirty (30) days of this notice. If your tribe provides information during consultation process, any sensitive information shared with the City regarding cultural places and/or sacred sites will be kept strictly confidential and will not be divulged to the public.

If your tribe would like to consult pursuant to AB52 about the proposed project, please contact me by phone at (714) 647-5481 or by email at JGuevara@santa-ana.org.

Sincerely,

Jerry Guevara
Assistant Planner I

AB 52 Notification
5/7/2020

CITY OF SANTA ANA
PLANNING AND BUILDING AGENCY
20 Civic Center Plaza ● P.O. Box 1988
Santa Ana, California 92702
www.santa-ana.org

May 7, 2020

Chairperson Matias Belardes
Juaneno Band of Mission Indians Acjachemen Nation
32161 Avenida Los Amigos
San Juan Capistrano, CA 92675

RE: INVITATION TO CONSULT PER ASSEMBLY BILL 52 NOTIFICATION – CITY OF SANTA ANA

Dear Chairperson Belardes,

This letter is to formally invite you to request consultation pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) regarding a proposed project in the city of Santa Ana. Pursuant to California Public Resources Code (PRC) Section 21080.3.1(b), Juaneno Band of Mission Indians Acjachemen Nation has submitted a request for notification of preparation of an environmental impact report (EIR), negative declaration (ND), or mitigated negative declaration (MND) for projects that are within the geographic area traditionally and culturally affiliated with this tribe. California Native American Tribes may request consultation regarding possible significant effects that implementation of the proposed project may have on tribal cultural resources. A request must be in writing to the City of Santa Ana and must identify a lead contact person. If consultation is requested, the City of Santa Ana will begin the consultation process within 30 days.

The City of Santa Ana is proposing the adoption of a Sign Ordinance as a part of the Municipal Code to allow digital billboards along the freeway frontages. The City is evaluating Potential Billboard Areas located on properties zoned for commercial or industrial uses along portions of State Route 55 (SR-55), SR-22, and Interstate 5 (I-5). Exhibit 1 depicts the six Potential Billboard Areas.

The City of Santa Ana is committed to fulfilling the goals of AB52 and believes that tribal participation in the planning process is crucial. The intent of consultation is to provide an opportunity for local governments and interested tribes to work together early in the

planning process toward the protection of Native American cultural places and resources that might not appear on cultural resource registries. This is an opportunity for your tribe to participate in the process for this project.

Figures showing the location of the project and the proposed site plan are attached to assist you in deciding whether or not to consult with the City about the proposed project. Under AB52, a Request for Consultation about the project must be made within thirty (30) days of this notice. If your tribe provides information during consultation process, any sensitive information shared with the City regarding cultural places and/or sacred sites will be kept strictly confidential and will not be divulged to the public.

If your tribe would like to consult pursuant to AB52 about the proposed project, please contact me by phone at (714) 647-5481 or by email at JGuevara@santa-ana.org.

Sincerely,

Jerry Guevara
Assistant Planner I

AB 52 Notification
5/7/2020

CITY OF SANTA ANA
PLANNING AND BUILDING AGENCY
20 Civic Center Plaza ● P.O. Box 1988
Santa Ana, California 92702
www.santa-ana.org

May 7, 2020

Chairperson Anthony Morales
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. Box 693
San Gabriel, CA 91778

RE: INVITATION TO CONSULT PER ASSEMBLY BILL 52 NOTIFICATION – CITY OF SANTA ANA

Dear Chairperson Morales,

This letter is to formally invite you to request consultation pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) regarding a proposed project in the city of Santa Ana. Pursuant to California Public Resources Code (PRC) Section 21080.3.1(b), Gabrieleno/Tongva San Gabriel Band of Mission Indians has submitted a request for notification of preparation of an environmental impact report (EIR), negative declaration (ND), or mitigated negative declaration (MND) for projects that are within the geographic area traditionally and culturally affiliated with this tribe. California Native American Tribes may request consultation regarding possible significant effects that implementation of the proposed project may have on tribal cultural resources. A request must be in writing to the City of Santa Ana and must identify a lead contact person. If consultation is requested, the City of Santa Ana will begin the consultation process within 30 days. The City of Santa Ana is proposing the adoption of a Sign Ordinance as a part of the Municipal Code to allow digital billboards along the freeway frontages. The City is evaluating Potential Billboard Areas located on properties zoned for commercial or industrial uses along portions of State Route 55 (SR-55), SR-22, and Interstate 5 (I-5). Exhibit 1 depicts the six Potential Billboard Areas.

The City of Santa Ana is committed to fulfilling the goals of AB52 and believes that tribal participation in the planning process is crucial. The intent of consultation is to provide an opportunity for local governments and interested tribes to work together early in the

planning process toward the protection of Native American cultural places and resources that might not appear on cultural resource registries. This is an opportunity for your tribe to participate in the process for this project.

Figures showing the location of the project and the proposed site plan are attached to assist you in deciding whether or not to consult with the City about the proposed project. Under AB52, a Request for Consultation about the project must be made within thirty (30) days of this notice. If your tribe provides information during consultation process, any sensitive information shared with the City regarding cultural places and/or sacred sites will be kept strictly confidential and will not be divulged to the public.

If your tribe would like to consult pursuant to AB52 about the proposed project, please contact me by phone at (714) 647-5481 or by email at JGuevara@santa-ana.org.

Sincerely,

Jerry Guevara
Assistant Planner I

AB 52 Notification
5/7/2020

CITY OF SANTA ANA

PLANNING AND BUILDING AGENCY

20 Civic Center Plaza ● P.O. Box 1988
Santa Ana, California 92702
www.santa-ana.org

May 7, 2020

Chairperson Andrew Salas
Gabrieleno Band of Mission Indians – Kizh Nation
P.O. Box 393
Covina, CA 91723

RE: INVITATION TO CONSULT PER ASSEMBLY BILL 52 NOTIFICATION – CITY OF SANTA ANA

Dear Chairperson Salas,

This letter is to formally invite you to request consultation pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) regarding a proposed project in the city of Santa Ana. Pursuant to California Public Resources Code (PRC) Section 21080.3.1(b), Gabrieleno Band of Mission Indians – Kizh Nation has submitted a request for notification of preparation of an environmental impact report (EIR), negative declaration (ND), or mitigated negative declaration (MND) for projects that are within the geographic area traditionally and culturally affiliated with this tribe. California Native American Tribes may request consultation regarding possible significant effects that implementation of the proposed project may have on tribal cultural resources. A request must be in writing to the City of Santa Ana and must identify a lead contact person. If consultation is requested, the City of Santa Ana will begin the consultation process within 30 days.

The City of Santa Ana is proposing the adoption of a Sign Ordinance as a part of the Municipal Code to allow digital billboards along the freeway frontages. The City is evaluating Potential Billboard Areas located on properties zoned for commercial or industrial uses along portions of State Route 55 (SR-55), SR-22, and Interstate 5 (I-5). Exhibit 1 depicts the six Potential Billboard Areas.

The City of Santa Ana is committed to fulfilling the goals of AB52 and believes that tribal participation in the planning process is crucial. The intent of consultation is to provide an opportunity for local governments and interested tribes to work together early in the

planning process toward the protection of Native American cultural places and resources that might not appear on cultural resource registries. This is an opportunity for your tribe to participate in the process for this project.

Figures showing the location of the project and the proposed site plan are attached to assist you in deciding whether or not to consult with the City about the proposed project. Under AB52, a Request for Consultation about the project must be made within thirty (30) days of this notice. If your tribe provides information during consultation process, any sensitive information shared with the City regarding cultural places and/or sacred sites will be kept strictly confidential and will not be divulged to the public.

If your tribe would like to consult pursuant to AB52 about the proposed project, please contact me by phone at (714) 647-5481 or by email at JGuevara@santa-ana.org.

Sincerely,

Jerry Guevara
Assistant Planner I

AB 52 Notification
5/7/2020