



**City of Santa Ana**  
**20 Civic Center Plaza, Santa Ana, CA 92701**  
**Planning Commission Staff Report**  
**August 12, 2024**

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**Topic:** Related Bristol Specific Plan Entitlements and Development Agreement (3600 S. Bristol Street)

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**RECOMMENDED ACTIONS**

Recommend that the City Council:

1. Adopt a resolution to (1) certify the Final Supplemental Environmental Impact Report (SEIR) No. 2022-01 (SCH No. 2020029087), including adoption of environmental findings of fact pursuant to the California Environmental Quality Act, (2) adopt of a Statement of Overriding Considerations, (3) adopt the Mitigation Monitoring and Reporting Program, and (4) approve the Project;
2. Adopt an ordinance approving Amendment Application No. 2023-03 to establish the Related Bristol Specific Plan No. 5 and to approve a zone change for the Property located at 3600 Bristol Street from General Commercial (C2) and Commercial Residential (CR) to Related Bristol Specific Plan (SP No. 5);
3. Adopt an ordinance approving Development Agreement No. 2023-02;
4. Adopt a resolution approving Vesting Tentative Tract Map No. 2023-01 (County Map No. 19272), as conditioned; and
5. Adopt a resolution overruling the Orange County Airport Land Use Commission's determination that the Related Bristol Specific Plan is inconsistent with the Airport Environs Land Use Plan, including supportive findings.

**EXECUTIVE SUMMARY**

Steven Oh, with RCR Bristol LLC (Applicant), on behalf of Greenville Ranch LLC, BSG West Bristol LLC, and MCG Bristol West LLC (Property Owners), is seeking approval of various entitlements to facilitate establishment of a new Specific Plan (SP) and construction of a new, mixed-use urban village. The project site is located on a 41-acre site bounded by Bristol Street to the east, Sunflower Avenue to the south, Plaza Drive to the west, and MacArthur Boulevard to the north, generally referred to as Callens Common and Metro Town Square in the South Bristol Street Focus Area of the General Plan. The site is located within the southern portion of Santa Ana at 3600, 3606, 3732, 3701, 3719, 3810, 3814, 3820, and 3900 South Bristol Street. The site includes the following nine parcels: Assessor Parcel Nos. 412-131-12, 412-131-13, 412-131-14, 412-131-16, 412-

131-17, 412-131-22, 412-131-24, 412-131-25, and 412-131-26, collectively referred to as 3600 South Bristol Street.

The SP proposes up to 3,750 residential units, 200 units of senior continuum of care living, a 250 room key hotel (approximately 150,000 square feet), 350,000 square feet of commercial space, and approximately 13.1 acres of publicly accessible open space, which will be comprised of active/programmed open space, passive open space, plazas, paseos, a connecting Greenlink through the site, and similar green spaces. Staff is recommending approval of the request because the proposed SP is consistent with the General Plan land use designation for the site, implements the goals and vision of the South Bristol Street Focus Area of the General Plan, and provides for a high-quality mixed-use urban village that will contribute community benefits and new economic development opportunities for Santa Ana.

## **DISCUSSION**

**Table 1: Project and Location Information**

<b>Item</b>	<b>Information</b>	
Project Address and Council Ward	3600 S. Bristol Street – Ward 4	
Nearest Intersections	41-acre site bounded by Bristol Street to the east, Sunflower Avenue to the south, Plaza Drive to the west, and MacArthur Boulevard to the north	
General Plan Designation	Existing: District Center High (DC-5) Proposed: District Center High (DC-5) (no change)	
Zoning Designations	Existing: General Commercial (C2) in the general northern portion of the site and Commercial Residential (CR) in the general southern portion of the site Proposed: Related Bristol Specific Plan (SP No. 5)	
Surrounding Land Uses	North	Commercial
	East	Commercial
	South	South Coast Plaza Regional Commercial Center (City of Costa Mesa)
	West	Commercial and Multiple-Family Residences
Property Size	41.13 acres	
Existing Site Development	The site is currently developed with various commercial uses, including big-box retail, neighborhood retail, eating establishments, service and health club uses, professional offices, and surface parking lots	
Use Permissions	Mixed-use urban villages permissible by the DC-5 General Plan land use designation	
Zoning Code Sections Affected	Uses	Division 25 (Specific Plan) of Chapter 41 (Zoning) of the Santa Ana Municipal Code
	Development Standards	Appendix A, Table LU-A-1 (Interim Development Standards) of the General Plan Land Use Element

### **Project Description**

The Specific Plan proposes development of a new, mixed-use urban village consisting of residential, commercial, hospitality, senior care, and open space uses on the 41-acre site. The site is designed as a 21 village block layout in a grid pattern, each with mixed-use land uses. The northern portion of the site, blocks 1 through 10 (north of Callens Common), would contain up to 2,375 residential units, 100,000 square feet of commercial space, 2.5 acres of open space known as the Bristol Central Park, 0.25 acres of paseos and green-links, and 4.3 acres of other open space areas as plazas and other green spaces. Moreover, the building contained in block 4 would contain approximately 16,000 square feet of amenity interior space for private use by residents of the new community. Design guidelines and development standards for this portion of the site are intended to produce a medium-intensity village to transition the site from the urban uses at the southern end to the existing, medium-intensity residential communities and commercial developments to the north of the project site.

The southern portion of the site (“Village Core”), blocks 11-21 (south of Callens Common), would form the mixed-use, urban core of the project site. This portion would contain up to 1,375 residential units, 250,000 square feet of commercial space, 250 hotel room keys, 200 units of senior continuum of care living, 1.5 acres of open space known as the Bristol Plaza/Bristol Green, 0.3 acres of paseos and green-links, and 4.3 acres of other open space areas in the form of plazas, parks, and other green spaces. As this portion of the site would contain fewer residential units and more commercial space, design guidelines and development standards for this portion of the site are intended to produce an urban heart for the community, with medium- to high-intensity development that matches the scale of development surrounding the southern portion of the project site.

**Table 2: Specific Plan Land Use and Parking Summary**

<b>Land Use</b>	<b>Proposed Intensity</b>	<b>Existing Intensity</b>	<b>Proposed Parking</b>
Residential	Up to 3,750 units	0 units	1.3 constructed spaces per unit, inclusive of up to 10 percent tandem/compact (up to 2.0 spaces per unit with parking management and valet)
Senior Living/Continuum of Care	Up to 225,000 square feet/200 units	0 square feet/units	0.6 spaces per unit, subject to approval of a coordinated transportation management service
Hospitality (Hotel)	Up to 150,000 square feet/250 room keys	0 square feet/room keys	0.6 spaces per room key

Land Use	Proposed Intensity	Existing Intensity	Proposed Parking
Commercial	Up to 350,000 square feet	465,063 gross square feet	4.0 spaces per 1,000 square feet
Open Space (Publicly Accessible)	Up to 13.1 acres	0 acres	N/A
		<b>Total Parking Spaces</b>	<b>Constructed: 6,520 With Valet: 8,940</b>

In addition to the uses above, the SP is structured to foster creation of a multi-modal, mixed-use urban village to implement the vision of the General Plan for the South Bristol Street Focus Area. Development standards are proposed to establish wide sidewalks along all street frontages, pedestrian pathways with opportunities for outdoor dining, landscape buffers between the sidewalks and street, bike lanes, and landscape medians. The site would be developed as 21 blocks; multiple roadways designed to create a grid pattern found in contemporary, mixed-use villages as a means of creating more walkable, pedestrian-scaled communities would bisect the site. Onsite roadways would also be designed with similar principles, with sidewalks, landscape buffers, on-street parking, and vehicle travel lanes.

### *Residential and Senior Care Components*

The SP would allow for up to 3,750 residential units. As proposed, all residential units would be multi-family units in midrise structures. The majority of the project's 21 blocks would contain upper-level residential units, while some of the blocks in the northern portion would contain ground-level residential units, similar to the existing developments to the west and north of the project site.

As the requested actions would establish a specific plan, individual residential buildings and unit configurations would be reviewed as each implementing project is submitted to the City for review through the administrative Development Project Review process, similar to what takes place in other master-planned areas of the City, such as the MainPlace or Harbor Boulevard specific plan areas. Should individual buildings fail to satisfy the development standard and design requirements of the Specific Plan, they would be remanded to the Planning Commission for review.

In addition to the residential component, the SP would allow for up to 200 senior continuum of care living units. This component would allow for "aging in place," with a range of services and living accommodations ranging from assisted living to skilled nursing and memory care, similar to existing facilities found in Santa Ana such as Town & Country Manor near City Place. In the SP, the senior continuum of care living units are envisioned to form one of two high-rises in the community, with the other being the hotel. As proposed, the facility would contain 20 stories (285 feet maximum) and provide for 0.6 parking spaces per unit, a rate that takes into account reduced private vehicle ownership by residents but that also provides for enough staff and service parking.

### *Commercial and Hotel Components*

The SP would allow for up to 350,000 square feet of commercial space for a variety of retail, eating establishment, service, and complementary uses designed to promote a high-quality, urban village. The SP proposes a use matrix that focuses the most intense commercial development in the southern portion of the site that is adjacent to South Coast Plaza and the adjacent, existing commercial and high-rise office uses in the area. Should uses and definitions transition over time, the SP contains flexibility that allows the Executive Director of the Planning and Building Agency to issue a use determination while maintaining consistency with the purposes and intent of the SP.

To ensure a broad range of regional and local-serving commercial uses are provided for in the site, the SP proposes a variety of commercial space configurations. Commercial uses will be permissible in mixed-use residential and commercial buildings, as standalone commercial buildings in the southern heart of the Village Core area, or integrated as part of the proposed hotel. The commercial component of the SP will be parked at 4 spaces per 1,000 square feet of gross floor area, a rate which is commensurate with commercial parking ratios for planned shopping centers.

In addition to the 350,000 square feet of commercial space, the SP proposes a 250 room key hotel at the southern portion of the Village Core with full amenities, such as dining, conference and business centers, rooftop amenities, and other features commensurate with high-quality hospitality uses. In the SP, the hotel would form one of two high-rises in the community, with the other being the senior continuum of care living units. As proposed, the hotel would contain 25 stories (285 feet maximum) and provide for 0.6 parking spaces per hotel room key, a rate that takes into account the site's proximity to John Wayne Airport and reduced demand for parking by individual guests but that is 0.5 spaces per room less than standard Santa Ana Municipal Code (SAMC) requirements.

### *Open Space*

A total of up to 13.1 acres, or almost one-third, of the project site are proposed as publicly accessible open space areas. These open space areas are envisioned in a variety of formats, including the Bristol Central Park (2.5 acres) in the northern portion of the site, the Bristol Green and Bristol Plaza (1.5 acres combined) in the Village Core (southern) portion of the site, and various paseos and green-links (9.1 acres), which are travel ways with generous landscaped areas for cyclists and pedestrians. Open space areas will be programmed for a variety of uses, such as active and passive recreation, amphitheaters and performances, farmers markets, kiosks, and other supportive uses designed to ensure long-term quality and use by Santa Ana residents, community organizations, and businesses.

The proposed open space amounts to an average of 200 square feet per residential unit. The SP requires a minimum of 50 square feet of private open space per residential unit

through balconies or patios, while the remaining 150 square feet of open space per unit will be in common open space areas for residences. These include as courtyards, pool and spa areas, dog parks, roof decks, fitness rooms, business centers, and other amenities typically found in highly-amentized residential communities.

### *Specific Plan*

A specific plan is a zoning tool available to local jurisdictions to establish a master plan that ensures high-quality, long-term development over a defined area. The specific plan has been identified as the appropriate zoning tool for the project site to implement the Land Use Element of the General Plan, and due to the desire to redevelop the site with new uses over time; to ensure high-quality streetscape, open space, architectural, and landscape design; and to reflect the single ownership of the entire project site.

California Government Code Sections 65450 through 65457 addresses specific plans. Section 65451 of the California Government Code mandates that a specific plan contain the following components: Introductory Plan Information, Summary, Introduction, Land Use Planning and Regulatory Provisions, Infrastructure Plan, Program of Implementation Measures, Relationship of the Specific Plan's Environmental Document to Subsequent Discretionary Projects, Specific Plan Administration, Specific Plan Enforcement, and Appendices. Moreover, a specific plan must contain provisions or requirements for funding of public improvements and collection of fees.

The proposed Related Bristol Specific Plan, Specific Plan No. 5 (SP-5), contains the required components listed above (Exhibit 7). The Specific Plan details the site's context and setting, including its relationship with the surrounding community and its intent of creating a mixed-use urban village with commercial, employment, residential, open space, and visitor amenities and components that are consistent with the vision of the General Plan.

Specific plans are a mechanism to ensure that projects develop in an organized and a cohesive manner. Specific plans incorporate a development framework for land use, circulation, and infrastructure including drainage, sewer, and water facilities. Specific Plans also set the guidelines for implementing projects within the SP area relating to architecture, urban design and landscaping.

The Specific Plan is intended to achieve the following:

- Ensure consistency with the General Plan by carrying out its applicable goals, policies, and requirements.
- Implement the General Plan vision that the Specific Plan for the South Bristol Street Focus Area establish the building improvements, infrastructure, recreational features, and other identified facilities, services, and amenities (collectively, the

Plan development features) and shall be guided by the standards and guidelines provided by this Specific Plan.

- Provide for the improvements necessitated by the development within the Specific Plan area.
- Comply with all requirements of Specific Plan law, including the provision of financing.

A comprehensive set of design guidelines and development regulations are included to guide and regulate site planning, landscape, and architectural character within the Specific Plan area ensuring that excellence in design is achieved during project development. The Related Bristol Specific Plan establishes the procedures and requirements to approve new development within the SP area. In addition, SP-5 contains six guiding principles that are intended to realize the success of the site and the General Plan as a regional destination and as a contributor to the existing community. The six guiding principles are:

1. Economic Activity – Related Bristol offers a uniquely urban setting in the heart of Orange County, leveraging walkability, place-making, and vibrant mixed-use density to add value to the greater neighborhood and City. Related Bristol addresses the evolving nature of retail and commercial real estate which necessitates a strategic holistic approach to ensure economic vitality into the future.
2. Culture – Related Bristol will be a dynamic mixed-use hub for the community and complementary of neighborhood cultural touchstones.
3. Community, Inclusion and Connectivity – Related Bristol is shaped around dynamic open spaces that unite the residents, neighborhood, and greater community. The publicly accessible open space serves as a destination for both organized and informal community connections.
4. Mobility – Related Bristol's multi-modal mobility strategy prioritizes the pedestrian experience, while strategically addressing the realities of vehicular traffic. Additionally, the central location of the site presents the opportunity for increased connectivity to the greater neighborhood via bicycle paths.
5. Sustainability and Resilience – Related Bristol will take proactive measures to address the sustainability and resilience needs of the site. Avenues for reduced energy consumption, heat island effect, and water use will be considered.
6. Urban Form and Architectural Quality – Related Bristol's urban form will be characterized by its human scale; its engaging, memorable architecture; and the flow between indoor and outdoor spaces.

Implementing projects would be submitted to the City for review on a case-by-case basis, requiring administrative review unless thresholds are met to require review and approval by the Planning Commission and/or City Council. Development regulations within the SP will ensure that projects are constructed pursuant to standards establishing setbacks and pedestrian zones, parking, and height. Allowable uses are defined for the two different

sub-districts within the SP to ensure compatibility with surrounding communities. Design Guidelines and Implementation sections within the SP will ensure that implementing projects are high-quality and reviewed consistently, streamlining the process for new developments in the SP area.

### **Project Background**

The Land Use Element of the General Plan references that “Interim Development Standards provide a framework for connecting the General Plan land use designations for each focus area with the City's existing zoning ordinance, specific plan(s), and/or specific development(s) plan provisions in regards to the use and mixed-use development standards (i.e. density, building type, parking, open space, etc.).” However, the Land Use Element references development or adoption of specific plans as a tool to implement the General Plan post-adoption (Action No. 2.12). As the General Plan Update was completed and adopted in April 2022, the proposed SP-5 has been identified as the appropriate tool to entitle the proposed site development.

#### *General Plan Update (2022)*

In April 2022, the City Council adopted an updated General Plan that establishes the long-term vision for the City of Santa Ana, and provides a vision for the site as a gateway into the City designed as a high intensity mixed-use urban village. The proposed SP and its development program are consistent with, and implement, that vision.

The General Plan Land Use Element contains five Focus Areas, which are portions of Santa Ana that were analyzed through a seven-year visioning process with the community to evaluate potential for new or modified land uses. The project site is within the South Bristol Street Focus Area, which according to the General Plan, “represents Santa Ana’s southern gateway and is a part of the successful South Coast Metro area. Between Sunflower and Alton Avenues, the District Center land use designation will create opportunities to transform auto-oriented shopping plazas to walkable, bike-friendly, and transit-friendly urban villages that incorporate a mix of high intensity office and residential living with experiential commercial uses.” According to the General Plan, the South Bristol Street Focus Area contains 220 existing housing units but envisions 5,272 additional housing units. The Focus Area envisions a built environment with the following components:

1. New development will establish vibrant public outdoor space appropriately scaled to the size and type of project.
2. Building design should be dynamic and strong, creating a distinct impression.
3. Office and Mixed-use spaces of similar scale to those south of Sunflower Avenue are envisioned between Sunflower Avenue and MacArthur Boulevard.



The City's intent for this area builds off the South Bristol Street Objectives as outlined on page LU-61 of the General Plan Land Use element:

- Capitalize on the success of the South Coast Metro area;
- Introduce mixed-use urban villages and encourage experiential commercial uses that are more walkable, bike friendly, and transit oriented;
- Realize an intense, multistory presence along the corridor; and
- Provide for mixed-use opportunities while protecting adjacent, established low density neighborhoods

Within the South Bristol Street Focus Area, the SP area is designated District Center-High (DC-5). The District Center designation includes the major activity areas of the City of Santa Ana, designed to serve as anchors to the City's commercial corridors and to accommodate major development activity. Table LU-8 of the General Plan identifies the DC-5 area as allowing a maximum Floor Area Ratio of 5.0, or 125 dwelling units per acre and a maximum building height of 25 stories. The General Plan's District Center designation would allow up to 8,733,780 square feet of mixed uses, inclusive of residential uses, based on the maximum FAR of 5.0 over the 41.13-acre project site. As proposed, the Specific Plan will result in an FAR of 2.7, which is within the maximums permissible by the General Plan.

#### *Site Information and History*

The SP area is located within the larger South Coast Metro area of Orange County, one of the most intensive and urban mixed use areas of Orange County. The South Coast Metro area includes retail, Class "A" office, high and mid-rise residential, hotels, restaurants and a state of the art performing arts center. The area is largely centered around South Coast Plaza in the adjacent City of Costa Mesa. This metro area is located at the confluence of the regional freeway systems and major arterials, providing access to Orange County, Los Angeles, San Diego and the Inland Empire. John Wayne Airport, a commercial airport serving the Orange County area is located less than 1.5 miles from the SP area.

The existing shopping center contains six parcels based on recorded Parcel Maps from the late 1970s. The present shopping center includes approximately 465,063 square feet of retail uses and the associated surface parking required to serve those uses. Existing uses include general retail, financial, food service, fitness, grocery, and medical-related uses. The site includes 3 multi-story buildings and 11 one-story buildings with single and multiple tenants. All parking is currently provided in 2,381 surface parking spaces in areas located throughout the project site. In prior years, the Planning Commission approved Variance Nos. 2000-02 and 2011-08, allowing for 12.8 and 12.0-percent reductions in onsite parking, respectively. The variances were approved to facilitate construction of a health club (currently operating as LA Fitness) and a new retail/restaurant building at the southeast corner of the project site.

The existing commercial development on site known as the Bristol Center has undergone several renovations since its construction. In the early 1900s, the site was used for farming of sugar beets and lima beans. Following construction of South Coast Plaza in the late 1960s, additional commercial, multiple-family residential, hospitality, and community uses followed in the South Coast Metro area. The Project site was developed into a shopping center in the 1970s and it has remained in commercial use since that time. All commercial leases on the project site are set to expire in 2025.

## **Analysis**

An analysis of the proposed Specific Plan is presented in Table 3, below and on the following pages.

**Table 3: Issues Analysis**

Issue	Analysis
Scale and Compatibility	<p>The SP is intended to produce a dynamic, mixed-use village that is integrated into and respects the surrounding community. The General Plan land use designation of DC-5 for the site allows developments up to 25 stories tall and with a floor area ratio (FAR) of 5.0. The SP proposes several buildings not to exceed 25 stories with a majority between 1 and 7 stories and with a FAR of 2.7, which is consistent and below the maximums prescribed by the General Plan.</p> <p>The project site is surrounded by commercial and multiple-family residential communities. New buildings will be limited to 8 stories in height in various segments of the northern portion of the site, while more intense development is allowed along the western and southern portions of the SP area adjacent to existing mixed-use and commercial developments. The SP's design guidelines will ensure that new projects are built to be compatible with existing surrounding uses by incorporating step-backs (Sections 3.2 – Land Use Plan, and 5.5.1 – Site Planning Guidelines) and other features to reduce massing, while the street plans for onsite roadways will ensure sufficient buffers between roadways, sidewalks, plaza areas, and buildings.</p>
Density	<p>The existing DC-5 General Plan land use designation permits residential density at the site up to 125 dwelling units per acre. The SP proposes a residential density of 91 dwelling units per acre, which is below the permissible 125 dwelling units per acre maximum. Typical residential densities of existing multiple-family communities in the area range from 16 to 25 dwelling units per acre, which is below the 91 proposed by the SP. However, the SP includes a variety of development standards, design guidelines, and amenities designed not only to reduce the impact of higher-density residential development, but to also enhance existing community-wide amenities for existing residences surrounding the site. The project will feature 13.1 acres of publicly accessible open space, which will be accessible to all Santa Ana residents and programmed regularly with functions to provide active and passive recreation. Finally, a minimum of 200 square feet of residential open space and amenity space will be required for each residential unit within the SP area, ensuring a livable environment for residents.</p>

Issue	Analysis
Onsite Parking	<p>The entire site currently contains 2,381 surface parking spaces. As part of the review of the proposed SP, a parking study was prepared to evaluate the proposed parking ratios detailed in Table 2 of this staff report (Exhibit 7). The study, prepared by Linscott, Law, and Greenspan Engineers (LLG), finds that the proposed total 6,520 onsite parking spaces is sufficient to accommodate the land uses proposed on the site. In particular, the parking study closely evaluates projected residential demand and supports the proposed residential parking ratios:</p> <ul style="list-style-type: none"> <li>• Constructed spaces: 1.3/unit <ul style="list-style-type: none"> <li>○ 4,875 spaces for residences</li> <li>○ 1,645 spaces for commercial components</li> </ul> </li> <li>• Constructed spaces + valet/other management: 2.0/unit <ul style="list-style-type: none"> <li>○ 7,295 spaces for residences</li> <li>○ 1,645 spaces for commercial components</li> </ul> </li> </ul> <p>The majority of parking in the community would be below grade (underground), similar to the parking configuration in place at Crystal Court, part of South Coast Plaza in Costa Mesa. On-street parking would be provided along onsite site roadways, and residential communities would contain “wrap” or “podium” parking structures for dedicated parking for each residential building. The Specific Plan allows for shared and alternative approaches to parking as technology evolves and parking demand is reduced through innovations such as parking lifts, enhanced transit, and ridesharing. Tandem stalls and compact stalls (up to 10 percent) would also be provided, subject to staff review and approval of a parking management plan or valet program.</p>
Regional Housing Needs Allocation (RHNA)	<p>The Housing Element Annual Progress Report includes a summary of Santa Ana’s progress in meeting its share of the RHNA. The State of California has placed an urgent emphasis on housing of all types. Santa Ana’s Regional Housing Needs Allocation (RHNA) for the next General Plan Housing Element cycle, which extends from 2021-2029, includes 3,137 housing units. This allocation is for housing units to be constructed to support the anticipated growth in the City over this period.</p> <p>The City of Santa Ana has a proven track record of not only planning for housing but issuing building permits for the construction of housing at all affordability categories as demonstrated by exceeding its 5th Cycle (2014-2021) RHNA by over 2,300 percent. The City is also on pace to meet or well exceed its affordable housing and other residential development requirements for the 6th Cycle (2021-2029) planning period, far outpacing any city in Orange County, as evidenced by issuing 1,635 permits for housing units across all affordability categories, fulfilling 52 percent of its RHNA less than two years into the eight-year planning period. The Related SP assists the City in achieving its housing goals in a location where high intensity urban development is both achievable and consistent with the current and envisioned surrounding urban form. The project is proposing up to 3,750 market-rate units. The City’s RHNA allocation for Above Moderate (&gt;120 percent of area median income, or AMI) for the 6<sup>th</sup> Cycle (2021-2029) planning period is 1,625 dwelling units. Therefore, the proposed development may achieve 2.31 times the allocated Above Moderate dwelling units for the planning period.</p>

Issue	Analysis
Consistency with the Affordable Housing and Opportunity Creation Ordinance (AHOCO)	The City's inclusionary housing ordinance, known as the Affordable Housing and Opportunity Creation Ordinance (AHOCO), generally applies to housing projects proposing five or more units that are also requesting an increase in allowable density or are located in certain sections of the City that were "up-zoned," such as through a City-initiated zone change or general plan amendment to allow additional residential development after November 28, 2011. As the proposed project is located in a section of the City that meets this threshold, the South Bristol Street Focus Area, the applicant's request is subject to the AHOCO requirements of production of affordable housing or payment of in-lieu fees. Pursuant to Santa Ana Municipal Code Sections 41-1903 (Exempt projects) and 41-1904 (Options to satisfy inclusionary requirements, the applicant has indicated intent to select the option to pay in-lieu fees at a rate of \$5 per square foot of habitable residential area. Based on available figures for the project and under the current ordinance, staff's analysis of the project indicates the project could generate between \$9,375,000 and \$18,750,000 in in-lieu fees, based on 3,750 units proposed, unit types/mix, and square footages. Any in-lieu fees generated by the project must be spent on production of affordable housing in the City of Santa Ana.

During the extensive outreach conducted as part of the project's review process, the community identified onsite parking supply and availability as a key concern. Specifically, the community identified parking concerns related to availability for the commercial components (supply, ease of access, and wayfinding) and the residential components (sufficient parking for future residents and their guests). Table 4, below, analyses the project's proposed parking supply against current Santa Ana Municipal Code (SAMC) requirements.

**Table 4: Parking Analysis**

Land Use	SAMC Requirement	Proposed in SP	Difference
Residential	1.0 spaces per dwelling unit, plus 1.0 space for each bedroom, plus spaces for guests calculated at 25 percent added to the gross calculation of 1.0 spaces plus 1.0 for each bedroom (minimum total per unit is 2.25 spaces)	1.3 spaces per dwelling unit, up to 2.0 spaces per unit with valet/parking management, inclusive of guest parking and up to 20 percent compact and tandem spaces	0.95 spaces per unit
Commercial	Range per 1,000 sq. ft. of gross floor area: <ul style="list-style-type: none"> <li>5.0 spaces (retail/service/medical office)</li> <li>8.0 spaces (restaurants)</li> </ul>	4.0 spaces per 1,000 sq. ft. of gross floor area	1.0 to 4.0 spaces per 1,000 sq. ft. of gross floor area
Hotel	1.1 spaces per room	0.6 spaces per room	0.5 spaces per room
Senior Continuum Care	Range of 1.0 (one-bedroom) to 1.5 (two-bedroom), plus spaces for guests calculated at 15	0.6 spaces per unit	0.55 spaces per unit

	percent added to the gross calculation (minimum total per unit is 1.15 spaces)		
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To address the differences in parking between the SAMC and the proposed SP, the applicant prepared a comprehensive parking study and parking management plan. The study and plan evaluate the proposed project, the project's anticipated parking demands, actual parking demands based on field observations at other similar multifamily communities, parking impacts, and means to mitigate any parking impacts of the project. To verify the findings of the study, City staff visited a dozen residential and mixed-use multifamily communities in Santa Ana and Costa Mesa to observe required vs. actual parking demands during early evening, late evening, and weekend visits. The field observations are consistent with the conclusions of the applicant's parking study and parking management plan. The study and plan (Exhibit 7) conclude that the proposed parking ratios, coupled with management strategies that include valet, vehicle lifts, and maximizing use of nearby transit, are sufficient to address parking demands for both the tenants and visitors of the project.

#### *Amendment Application (Zone Change)*

The subject site is currently in the General Commercial (C2) and Commercial Residential (CR) zoning districts. The existing zoning districts permits a variety of commercial uses and includes all uses that are permitted in the Community Commercial (C1) zoning district, and limited residential development. In addition to those uses, the C2 zoning district permits limited wholesale, research and development, equipment sales, car washes, trailer parks and camps, thrift shops, food distribution centers, indoor swap meets, warehouse stores, and superstores. These uses are permitted by right or are subject to approval of a conditional use permit. The existing C2 and CR zoning designations do not meet the goals and objectives of the project or the General Plan land use designation of DC-5 to produce a dynamic mixed-use village with residential, hotel, senior care, commercial, and open space land uses. Therefore, approval of the requested amendment application to establish the SP is required to implement the vision of the project and to establish consistency with the General Plan.

The proposed SP will establish permitted uses that will be permitted by right, subject to a conditional use permit, or subject to other minor reviews. The uses are intended to create a dynamic, mixed-use environment anchored by a central commercial core and surrounded by complementary land uses. These uses differ from those allowed by the existing C2 and CR zoning district designations at the site, which permit a broader range of commercial activities, many of which do not support the stated goals and vision for the project site.

The 2022 General Plan Update (GPU) provides long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the Santa Ana

community through 2045, and provides a comprehensive land use, housing, circulation and infrastructure, public service, resource conservation and public safety policies for the entire City. The updated GPU Land Use Element guides growth and development (e.g., infill development, redevelopment, use and revitalization/restoration) by designating land uses. The Related Bristol development plan is consistent with, and implements, the City's vision for the DC-5 and the South Bristol Focus Area. The SP itself contains an Appendix B, which further details General Plan Consistency of the proposed zone change.

Specifically, the SP and requested entitlements address General Plan consistency in the following manners:

- The District Center-High is a mixed-use designation identified in the General Plan as including “high density urban villages consisting of visually striking and dynamic buildings and spaces with a wide range and mix of residential, live-work, commercial, hotel, and employment-generating uses.”
- Table LU-2 of the General Plan (Buildout) identifies an assumed housing growth of 5,272 units in the District; the proposed 3,750 falls within the assumed growth.
- Table LU-8 of the General Plan identifies the DC-5 area as allowing a maximum Floor Area Ratio of 5.0, or 125 dwelling units per acre and a maximum height of 25 stories. The General Plan allows the FAR to be calculated on a gross basis for an individual development project.
- The General Plan's District Center designation would allow up to 8,733,780 square feet of mixed uses, inclusive of residential uses, based on the maximum FAR of 5.0 over the 41.13-acre (gross) site. As proposed, the Related Bristol will result in an FAR of 2.7, well within the maximums allowed in the General Plan. No General Plan Amendment is required nor proposed.
- The General Plan envisions “urban villages”, “an intense multistory presence” and “mixed use opportunities”. The Development Plan implements this vision with a range of building heights and configurations in two mixed-use Districts/Villages, with heights and intensities within the limits identified in the General Plan.
- The General Plan requires fiscal neutrality (Policy LU 2.4). The Project results in positive fiscal impacts.
- The General Plan calls for community involvement (Policy LU 3.2). Significant outreach has occurred as outlined in Specific Plan Section 2.5, Community Engagement.
- The General Plan encourages areas for community gathering and outdoor entertainment (Policy LU 2.3). The Specific Plan includes approximately 13 acres of open space, which includes public plaza areas and a central park, accessible to the public and allowing for outdoor entertainment.
- The Specific Plan area is not within an Environmental Justice area. However, as designed, the provision of nearly one-third of the 41-acre site for publicly accessible open space with active and passive recreation opportunities is a means of addressing open space deficiencies prevalent in many portions of Santa Ana.

Moreover, the SP and requested entitlements are consistent with multiple General Plan goals and policies. Exhibit 12 contains a full list of all applicable General Plan goals and policies that support the project.

### *Vesting Tentative Tract Map*

The applicant has submitted a vesting tentative tract map to subdivide the project site into 21 master lots, 205 airspace lots, and 12 private road lots within the Specific Plan area (Exhibit 9). The subdivision will allow the financing of individual components of the project site due to differences in funding mechanisms for commercial, residential, mixed-use, service-oriented, parking, and open space areas of the project site.

The vesting tentative tract map details roadway and utility improvements, as well as creation of new private roadways on the project site in order to develop the site as a pedestrian-oriented, mixed-use urban village with smaller blocks. CC&Rs will be adopted to define the operating and maintenance requirements. They will also maintain a property owner's association responsible for maintenance and enforcement of the CC&Rs and will ensure that parking and access can be shared throughout the entire Specific Plan area.

Approval of the vesting tentative tract map is consistent with the General Plan land use designation for the site, and the proposed project as conditioned conforms to all applicable requirements of the zoning and subdivision codes as well as all other applicable City ordinances, including the proposed Specific Plan. Moreover and as detailed in earlier analyses in this report, the project site is physically suitable for the type and density of the proposed project, and the design and improvements of the proposed project will not cause substantial environmental damage or substantially and avoidably injure fish and wildlife or their habitat. Lastly, the design or improvements of the proposed project will not cause serious public health problems, and the design or improvements of the proposed project will not conflict with the easements necessary for public access through or use of the property within the proposed project.

The project is located in an already-urbanized area that is proposed for redevelopment with additional urbanization in the form of commercial, service, hospitality, residential, and open space land uses, and the site is already served by infrastructure necessary to support the development. The project and its proposed subdivision have been thoroughly reviewed by City agencies, as well as the City's environmental consultant for the project, to ensure the design and improvements of the proposed project will not cause substantial environmental damage or substantially and avoidably injure fish and wildlife or their habitat. This review also ensures that the design or improvements of the proposed project will not cause serious public health problems, and the design or improvements of the proposed project will not conflict with the easements necessary for public access through or use of the property within the proposed project.

### *Development Agreement*

The applicant has requested approval of a development agreement (DA). Development agreements are contracts negotiated between project proponents and public agencies such as the City of Santa Ana that govern the land uses that may be allowed in a particular project (California Government Code Section 65864 et seq.). Although a DA is subject to negotiation, allowable land uses must be consistent with the local planning policies formulated by the legislative body through its general plan, and consistent with any applicable specific plan such as the proposed SP-5 (California Government Code Section 65867.5). Approval of a DA requires adoption of an ordinance.

To evaluate the proposed DA and identify priorities for the DA's terms, the City Council formed an ad hoc committee in October 2023 comprised of three City Council members. The ad hoc committee met regularly between October 2023 and June 2024 to review the applicant's proposed terms, identify community priorities, and ensure that the final DA addresses the ad hoc committee's priorities. While review of a DA is a private contractual process, the extensive community engagement process, and routine staff meetings with City Council and Planning Commission members, ensured that community priorities were effectively communicated to the ad hoc committee and informed the negotiation process.

The SP's DA addresses the agreement's term (duration), extensions, community benefits, indemnification, monitoring and reporting, inclusionary housing, hotel economic benefits, open space, infrastructure, modifications, and other relevant items (Exhibit 8). These terms have been crafted to ensure high-quality development at the project site with positive financial impacts to the City. Additional details are provided in the summary of major deal points in Table 5, Development Agreement Major Deal Points.

**Table 5: DA Major Deal Points**

<b>Topic</b>	<b>Ad Hoc Committee Recommendation</b>	<b>Proposed by DA</b>
Recordation	Record the DA against the property, not the leaseholder.	Consistent – The DA will be recorded against the fee property subject to terms and conditions of a Joinder.
Term (Duration) and Extension	One 20-year term, and one 5-year extension.	Consistent – The DA will have a single 20-year term. In addition, The DA will allow for a single 5-year automatic extension provided grading permits have been issued and construction has commenced on (a) no less than 250,000 square feet of non-residential floor area (e.g., retail, grocer, restaurants), and (b) a hotel subject to financial feasibility.



Topic	Ad Hoc Committee Recommendation	Proposed by DA
Timing (Phasing)	Require commencement of construction for at least 175,000 sq. ft. of commercial building area for any residential permits in excess of 1,875 units. Phase 1 or 2 shall have a grocer of at least 35,000 sq. ft.	Consistent – the DA stipulates that no building permits for residential units shall be issued in excess of 1,875 unless and until Owner commences construction activities for at least 175,000 square feet of commercial. Commercial in Phase 1 or Phase 2 shall include a grocer of no less than 35,000 square feet, which supports the community's and City's goals of maintaining a full grocer in the area.
Community Benefits	Concurrent with construction of Phase 1, Owner shall provide, if requested by the City, exclusive use of a 500-square foot space and 3 dedicated parking for use by the Police Department as an administrative substation. Additionally, a \$22,000,000 Community Benefit Payment will be paid in a three-payment schedule.	Consistent – Developer agrees to provide a Police Department substation and the \$22,000,000 Community Benefit Payment will be paid in a three-payment schedule.
Hotel Economic Benefits	Ensure in the DA that the hotel is operated by an internationally recognized flag or boutique operator, with proven performance records, at a minimum four-star (out of 5) rating.	Consistent – The hotel(s) shall be operated under a recognized hotel flag or by a boutique hotel operator with a demonstrated track record of success operating similar hotels. The developer will secure a four-star hotel or above.
Open Space	Accept the construction of 13.1 acres of contiguous onsite open space to satisfy the City's park provision and fee requirements. The developer must enter into a public access easement for the open space, and must be recorded on the property, that endures for the life of the project or residential uses on the property.	<p>The Project's open space will be constructed in a timely manner in accordance with the project's phasing, with "springing" easements recorded commensurate with phases to ensure public access.</p> <p>The Supplemental EIR prepared for the project identifies that the project will result in a demand for 27.7 acres of open space, which is 14.6 acres more than the 13.1 acres provided on site. However, the project will remain consistent with the General Plan pursuant to Table OS-3 (Open Space Element Implementation) of the General Plan, Action Nos. 1.7 and 1.10. Action No. 1.7, which recognizes the challenges and difficulty in creating</p>

Topic	Ad Hoc Committee Recommendation	Proposed by DA
		new open space and parklands in a built-out environment and provides for a reduction in on-site open space by giving credits for park land for public use as an incentive toward developer creation of open space areas that are accessible to the public. Action No. 1.10 encourages collaboration with property owners to provide public access and programming on private open space.
Inclusionary Housing	Payment of \$5 per sq. ft. of habitable space, contingent upon timely payment of the \$22,000,000 Community Benefit Payment.	<p>Consistent – Pursuant to SAMC Sections 41-1903(a), the applicant has proposed a DA to comply with Section 41-1904, allowing payment of in-lieu fees.</p> <p>SAMC Section 41-1904 provides for options to satisfy the Affordable Housing Opportunity and Creation Ordinance, including onsite units, offsite units, and payment of in-lieu fees. For projects containing 20 or more units, the in-lieu fee is as high as \$15 per sq. ft., but may be as low as \$5 per sq. ft. if determined by a DA or if using skilled and trained workforce.</p>

### *Overrule of Airport Land Use Commission's Inconsistency Determination*

Pursuant to Section 21676(b) of the California Public Utilities Code (PUC), the proposed project was reviewed by the Orange County Airport Land Use Commission (ALUC) for a determination of consistency with the Airport Environs Land Use Plan (AELUP) for John Wayne Airport (JWA).

On July 20, 2023, the ALUC held a public hearing on the project and found the project to be inconsistent with the AELUP for JWA in accordance with AELUP Sections 1.2 and 2.1.4 and Public Utilities Code (PUC) Section 21674. These sections empower the ALUC "to assist local agencies in ensuring compatible land uses in the vicinity of existing airports to the extent that the land in the vicinity of those airports is not already devoted to incompatible uses," and "to coordinate planning at the state, regional and local levels so as to provide for the orderly development of air transportation, while at the same time protecting the public health, safety and welfare." Based on this determination, the ALUC issued a letter of inconsistency.

As a final review authority on legislative acts, the City Council may, after a public hearing, choose to overrule the ALUC's decision by following the procedure established in PUC Sections 21676 and 21676.5. As part of the General Plan Update, the City Council adopted a resolution on April 19, 2022 in accordance with the procedure established in PUC Sections 21676 and 21676.5 to overrule the ALUC's finding that the General Plan Update was inconsistent with the AELUP for JWA. The action to overrule the ALUC's decision on the General Plan Update was based on the desire to advance the vision of the General Plan for the South Bristol Street Focus Area, which envisions a dynamic, mixed-use environment with building heights and massing of up to 25 stories within the Focus Area.

On August 29, 2023, City Council met and authorized staff to initiate and complete the procedure for the City Council to consider the Related Bristol Specific Plan and the proposed overriding of the determination made by the ALUC by (1) issuing a Notice of Intent to overrule and (2) giving notice to the ALUC of its decision to overrule as required by PUC Section 21676(b). On August 31 and again on September 26, 2023, the Planning Division provided a Notice of Intent to overrule the commission's determination with findings to the ALUC and the State Division of Aeronautics. On October 24, 2023, ALUC responded to the City's Notice of Intent. As of the date of publishing this report, no comments from the Division of Aeronautics had been received.

PUC Section 21676 permits the City Council, by a two-thirds vote of the members constituting a quorum, to overrule the ALUC's determination if it finds that the proposed project is consistent with the purposes of the State Aeronautics Act. The Act states: "It is the public interest to provide for the orderly development of each public use airport in this State and the area surrounding these airports so as to promote the overall goals and objectives of the California noise standards...and to prevent the creation of new noise and safety problems."

Based on staff's review of the project, the project will not adversely impact the operations of the airport, the future development plans that exists for the airport, the approaches to the airport runways, create noise concerns, or create public health, safety or welfare concerns. Additionally, the project falls within a level of acceptable risk considered to be a community norm. Multiple taller structures than those proposed in the SP area exist closer to the airport and its runways, notably in the cities of Costa Mesa, Irvine, and Newport Beach. Out of an abundance of caution and consistent with past practice, the applicant will be required to record an avigation/aviation easement with both the County and the City to prevent claims, actions or lawsuits for nuisance or interference with the use of the property against the City and John Wayne Airport.

### **Community Engagement and Public Notification**

Due to the complexity and scale of the project, public outreach and notification were conducted using a variety of manners to engage broad segments of the community.

Community engagement and public notification processes for the proposed Specific Plan exceed or meet the minimum requirements of the City. Upon submittal of the proposed SP to the City, staff met with the project applicant to provide information about the various Neighborhood Associations, business groups, and other communities surrounding the project site. Moreover, staff routinely attended Neighborhood Association meetings in the vicinity of the project site to provide updates, receive feedback, and answer questions on a regular basis. Details of the public engagement components of the proposed development is also documented in the Specific Plan document.

#### *Related Bristol Welcome Center*

In August 2022, at the time the initial application was submitted to the City, a Welcome Center was opened by the applicant on the site. The Welcome Center was open to the public or by appointment, where individual meetings with local residents and stakeholders could be held. Over 200 meetings with interested individuals and groups have taken place at the Welcome Center since that time to hear concerns and ideas related to redevelopment of the site and establishment of the SP.

#### *Sunshine Ordinance Community Meetings, and Additional Community and Neighborhood Association Meetings*

In accordance with Article II.II of the Santa Ana Municipal Code, Related California hosted a first community meeting on September 7, 2022. There were 3,300 notices mailed to advertise the event, which was held at Saddleback High School. Approximately 250 interested parties attended the meeting. The meeting was held using a format with individual stations by topic. Based on the first Sunshine Meeting the following were identified as key community priorities:

- Community Meeting Places, a place to meet neighbors and build community;
- Security and Safety. Desire for a police substation on the site;
- Mobility, Traffic, and Parking. Controlled traffic, intuitive and well-serviced parking for visitors and residents, and better infrastructure for pedestrians and cyclists; and
- Neighborhood Retail. Retail offerings that include local shops, a grocery, bank, and multiple dining experiences, with a mix of new uses and keeping favorite existing uses.

Pursuant to Sunshine Ordinance requirements, a second community meeting was held on November 16, 2022. There were 3,300 notices mailed to advertise the event, which was held at the Westin Hotel. Approximately 80 interested parties attended the meeting. A presentation was given, which introduced the Related Bristol developer's company, site history, SP and project vision, open space, site plan layout, amenities and services, and a summary of the feedback received from the community so far. The public was invited to provide questions and comments. Following the presentation, a panel spent

approximately one hour and twenty minutes addressing questions submitted by the audience.

In addition to the Sunshine Ordinance community meetings, the applicant has held over 200 meetings with local and regional stakeholders and met with 18 individual Neighborhood Associations on 18 separate occasions. These Neighborhood Associations and communities include: Metro Classic, Sandpointe, South Coast, Rosewood Baker, Morning Sunwood, Thornton Park, Wilshire Square, Floral Park, French Park, Republic Homes, South Coast Shores, as well as St. Albans condominiums. The applicant also met with 12 community organizations and 11 business organizations, either at the Welcome Center project site or by partaking in community events, such as outdoor concerts, the Downtown Santa Ana ArtWalk, and community and service organization meetings. Lastly, the applicant has met with existing businesses on the project site to inform various small and large businesses of the proposed SP.

#### *Planning Commission Work-Study Session*

A Planning Commission work-study session was held on March 13, 2023, during which members of the Planning Commission were provided a presentation on the draft specific plan, its status at the time of the work-study session, and an opportunity to provide general comments and pose questions. The public comment portion of the meeting was opened to allow for any project-related public comment on the project. General comments and questions received during this workshop are detailed in the Specific Plan document, but centered primarily on infrastructure and improvements, traffic, permissible uses, housing, fiscal impacts, parking, public safety, subdivisions, community engagement, and retention of existing onsite businesses and services.

#### *Online Content*

The applicant created a project website to gather input from those who could not attend in-person meetings. The applicant's website includes a section on Questions and Answers (Q&A) as well as polling and is available in the English, Spanish Vietnamese, and Chinese. According to the applicant, to date over 1,400 responses have been given to the Q&A and polling. Further, a project email and phone number was established to provide further opportunities to provide input. Lastly, the applicant's online outreach included social media webpages and advertisements designed to solicit feedback on the project.

As required by the Sunshine Ordinance, the City also established a project webpage. The webpage has been routinely updated with Sunshine Ordinance meeting materials, project information, key meeting dates, draft environmental documents, and the draft specific plan. The webpage also contains the City's contact information with a direct phone number and email to the case planner. As of the date of the publication of this report, over

three-dozen individuals had contacted the City directly to obtain additional information about the project.

Lastly, City staff have made themselves available on a regular basis to answer the community's questions about the proposed development through in-person meetings. Community members who contacted staff to learn more about the project were invited meet with staff to learn how to understand the draft environmental documents and the draft Specific Plan, and to answer broader questions about the General Plan Update and its environmental documentation. These individuals were also added to the City's notification list for the project.

### *Mandatory Notification Measures*

Project notifications were posted, published, and mailed in accordance with City and State regulations. Copies of the public notice, including a 2,000-foot notification radius map, and the site posting are provided in Exhibit 13. In addition, staff contacted the provided contacts for the Sandpointe, South Coast, Republic Homes, Metro Classic, Morning Sunwood, Thornton Park, Sunwood Central, and the Rosewood Baker Neighborhood Associations to ensure they were aware of the project and public hearing.

## **ENVIRONMENTAL IMPACT**

### *General Plan Update (GPU) Final Program Environmental Impact Report (Final PEIR)*

In April 2022, the City certified the GPU Final PEIR (SCH No. 2020029087) and adopted the GPU. The GPU Final PEIR is a Program Environmental Impact Report (PEIR) that examines the existing environment and the total scope of environmental effects that would occur as a result of buildout of the GPU land uses. As a Program EIR, the document comprehensively evaluated the potential environmental impacts stemming from adoption of the General Plan Update and subsequent implementing projects. Moreover, this type of EIR allows subsequent implementing activities, such as the proposed Specific Plan, to be evaluated through "tiering." Tiering refers to the coverage of general matters in broader EIRs, such as the GPU Final PEIR, with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared, such as in the case of the Related Bristol Specific Plan's Supplemental EIR, which has been prepared for the Project. Tiering is appropriate when the sequence of EIRs is (1) from a general plan, policy, or program EIR to a program, plan, or policy EIR of lesser scope or to a site-specific EIR, (2) from an EIR on a specific action at an early stage to a subsequent EIR or a supplement to an EIR at a later stage.

The Project site is located within the South Bristol Street Focus Area and has a land use designation of District Center-High (DC-5), which has a maximum Floor Area Ratio (FAR) of 5.0, or 125 dwelling units per acre (du/ac) and a maximum height of 25 stories that

allows up to 8,958,114 SF of mixed uses, inclusive of residential uses, within the Project site. This level of redevelopment was included in the GPU Final PEIR buildout, and applicable mitigation measures were identified, as necessary, to reduce impacts.

A project is consistent with the GPU if the development density does not exceed what was contemplated and analyzed for the parcel(s) in the certified GPU EIR and complies with the associated standards applicable to that development density (State CEQA Guidelines Section 15183(i)(2)). Development density standards can include the number of dwelling units per acre, the number of people in a given area, FAR, and other measures of building intensity, building height, size limitations, and use restrictions.

### *Supplemental Environmental Impact Report (SEIR)*

In compliance with the California Environmental Quality Act (CEQA), and as required by Public Resources Code (PRC) section 21166 and CEQA Guidelines section 15162, the City of Santa Ana has prepared a Supplemental EIR (SEIR) that evaluates the potential of the proposed Project to result in new or substantially greater environmental impacts than previously identified in the GPU Final PEIR. The City's certified PEIR examines the impacts associated with buildout of the Santa Ana General Plan. Once a Program EIR is prepared, subsequent activities within the program or changes to the program must be evaluated to determine whether additional CEQA documentation needs to be prepared. The Project site is within the South Bristol Street Focus Area and development of the site was analyzed in the FEIR at a programmatic level at 5.0 floor area ratio and 125 dwelling units per unit assumption per the General Plan District Center-High (DC-5) designation. The Related Bristol Specific Plan proposes the phased redevelopment of site, consistent with the General Plan District Center-High (DC-5) land use designation, and the City conducted project-level analysis to determine if the development of the Project would involve new significant environmental effects or a substantial increase in the impacts that were previously identified GPU Final PEIR. Following this project-level analysis, the City of Santa Ana prepared an SEIR that evaluated the potential of the proposed Project to result in new or substantially greater impacts than previously identified; applied the mitigation measures prescribed in the GPU FEIR; and where new or more significant impacts were identified, included Project specific mitigation measures. In addition, where impacts could not be mitigated to below a less than significant level, the SEIR made new significant and unavoidable findings

The Project's SEIR also provides information regarding short-term, long-term, direct, indirect, and cumulative environmental effects of the Project. It identifies feasible mitigation measures and alternatives that would minimize or eliminate the potentially significant impacts associated with implementation of the Project.

### *SEIR's Notice of Preparation (NOP)*

On March 17, 2023, the City sent to the Office of Planning and Research and each responsible trustee agency a Notice of Preparation (NOP), stating that a Supplemental

Environmental Impact Report (SEIR) would be prepared. A total of 20 comments were received during the 30-day NOP period which began on March 17, 2023, and ended on April 17, 2023. Pursuant to PRC section 21083.9 and CEQA Guidelines Sections 15082(c)(1) and 15083, the City hosted a public scoping meeting on March 30, 2023, to solicit comments on the scope of the environmental review of the proposed Project. Approximately 60 residents attended the meeting and raised concerns about traffic, pedestrian safety, population growth, aesthetics, and if cumulative impacts would be adequately considered. These issues were addressed in the Draft SEIR.

#### *SEIR Scoping Meeting*

The City hosted a public scoping meeting for the draft SEIR on March 30, 2023, to solicit comments on the scope of the environmental review of the proposed Project. Approximately 60 residents attended the meeting and raised concerns about traffic, pedestrian safety, population growth, aesthetics, and if cumulative impacts would be adequately considered. Participants were encouraged to submit comments on paper or via email to ensure inclusion in the draft SEIR and environmental analyses.

#### *Draft and Final SEIR Public Review and Availability*

The City determined at the onset of review and preparation based on analyses, the General Plan Final PEIR, existing site conditions, setting, and responses to the NOP, that the Project would have no impact or a less than significant impact on the following environmental topic areas and that no further, detailed analysis of these topics was required in the SEIR: Aesthetics, Agriculture and Forestry Resources, Biological Resources, Mineral Resources, and Wildfire. In particular with respect to aesthetics, Public Resources Code Section 21099 provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Here, the proposed Project is located in a Transit Priority Area and therefore the SEIR did not include a detailed analysis of aesthetics. However, a discussion on the topic is included in the Land Use and Planning section of the SEIR.

For each topical area of potential significance, the SEIR evaluates impacts of the project, what was evaluated by the GPU Final PEIR, mitigation measures already in place and adopted by the GPU Final PEIR’s MMRP, and project-specific mitigation measures. Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” Potential environmental effects of the proposed project and mitigation measures are discussed in detail throughout Chapter 5 of the SEIR. The Draft SEIR determined that mitigation measures were required to mitigate impacts to a less than significant level for the following resource areas: air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources.



However, the Draft SEIR concluded that despite the incorporation of all feasible mitigation measures, the proposed Project would nonetheless result in significant and unavoidable impacts to air quality and parks and recreation.

- Air Quality. Implementation of the proposed Project would result in short-term emissions of criteria air pollutants during Project construction and long-term emissions of criteria air pollutants from vehicular emissions, natural gas consumption, landscaping, applications of architectural coatings, and use of consumer products. The emissions from the proposed project are primarily from vehicle trips and use of consumer products that emit nitrous oxide or reactive organic gasses. The majority of the Project's emission exceedances are from consumer product and mobile sources and cannot feasibly be reduced by either the City or Project Applicant below the SCAQMD thresholds. Emissions from both consumer products and motor vehicles are controlled by State and federal standards and the City and applicant have no control over these standards. Due to the Project exceedance of the thresholds, impacts would be cumulatively considerable and significant and unavoidable.
- Parks and Recreation. As detailed in Section 5.12 of the SEIR (Parks and Recreation), the City currently has approximately 1.2 acres of public park and/or recreational space per every 1,000 residents, which is below the City's parkland aspirational standard of 3 acres of parkland per 1,000 residents. Based on the City's parkland aspirational standard of 3 acres of public park and/or recreational space per 1,000 residents, buildout of the project in the SP results in a need for approximately 27.7 additional acres of parkland to serve the estimated 9,238 new residents of the project site. The 13.1 acres of publicly accessible open space within a required 17.21 acres of common or private open space for residents provided by the project would be approximately 10.49 acres less than the City's parkland aspirational standard, which would exacerbate the existing citywide parkland deficiency. Although the proposed Project and cumulative projects would be required to provide park and recreational facilities, private open space, and/or pay in-lieu fees as required by the Santa Ana Municipal Code, the impacts related to the amount of parkland within the City would be cumulatively considerable and cumulative impacts related to parks and recreational facilities would be significant.

The SEIR also evaluated the following alternatives to the proposed Project that would feasibly avoid or lessen the proposed Project's significant environmental impacts while attaining most of the proposed Project's objectives: Alternative 1 (No project/No build), Alternative 2 (Reduced project alternative that reduces the commercial component to 250,000 square feet and eliminates the 250 hotel room keys), and Alternative 3 (Building of the existing zoning designations of C2 and CR, producing a maximum total of 1,032,774 square feet of commercial uses, 1,375 multi-family units, 250 hotel room keys, and 200 senior continuum of care living units). A detailed analysis of environmental impacts and feasibility of each alternative is included in the Final SEIR.

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared and is attached as to the resolution certifying the Final Supplemental Environmental Impact Report No. 2022-01. A Statement of Overriding Considerations will be necessary should the City Council decide to approve the Project because of the significant and unavoidable impacts to air quality and parks and recreation. The Statement of Overriding Considerations and Findings for the Project is attached as Exhibit A to the same resolution.

As required by CEQA Guidelines section 15087(a), the City filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse, indicating that the Draft SEIR had been completed and was available for public review. On July 6, 2023, a Notice of Availability of the Draft SEIR was published and the Draft SEIR was circulated for at least a 45-day public review and comment period from July 6, 2023 through August 21, 2023. During the public comment period, copies of the Draft SEIR and technical appendices were available for review and inspection at City Hall, on the City's project webpage, and at the City of Santa Ana Public Library (Civic Center location). The City received a total of 15 comments from various individuals, organizations, or government agencies during this period, and one comment after the public review period.

On August 1, 2024, the City released the Final SEIR, which contains the Draft SEIR, all technical appendices prepared in support of the Draft SEIR, all written comment letters received on the Draft SEIR, written responses to all written comment letters received on the Draft SEIR, and errata to the Draft SEIR and technical appendices. In accordance with PRC Section 21092.5, copies of the written responses to public agencies that submitted comments during the 45-day review period will be forwarded to those agencies at least 10 days prior to certification of the Final SEIR by the City Council, with copies of the Final SEIR document. Pursuant to CEQA Guidelines Section 15089(b), lead agencies may provide an opportunity for review of the Final SEIR by the public or by commenting agencies before a project is approved, but is not required to do so; the Final SEIR is available for review on the City's website at [www.santa-ana.org/related-california-bristol-specific-plan/](http://www.santa-ana.org/related-california-bristol-specific-plan/), at the City of Santa Ana Newhope Public Library, and at City Hall.

Staff recommends that the Planning Commission recommend that the City Council certify the Final SEIR and adopt the MMRP for the Project, and adopt CEQA Findings of Fact and Statement of Overriding Considerations. The entire Final SEIR and all required components, including comments, responses, detailed analyses, and the MMRP, are contained within Exhibit 6 of this report.

## **FISCAL IMPACT**

The General Plan Land Use Element requires projects proposing a zone change, such as the proposed SP, to evaluate economic, fiscal, and community benefits impacts through various analyses (Policy Nos. LU-2.4, LU-3.1, and Implementation Action No. 1.2). In accordance with the General Plan, the applicant provided and the City prepared

and/or peer-reviewed analyses on economic impacts (EIA), fiscal impacts (FIA), land residual value (LRV), and community benefits (CBA). The EIA, FIA, LRV, and CBA reports' conclusions about the proposed project and its impacts are outlined in Tables 6a, 6b, 6c, and 6d.

**Tables 6a, 6b, 6c, and 6d: Key Economic, Fiscal, and Community Benefits Findings**

<b>Table 6a: Key Economic Benefits Findings</b>			
<i>Topic</i>	<i>Existing Site</i>	<i>Proposed Project</i>	<i>Net Change</i>
One-Time Impacts	Not applicable	16,834 jobs, including direct, indirect, and induced full- and part-time jobs; \$1.5 billion in citywide one-time labor income; and \$667.3 million in intermediate inputs	Not applicable
Recurring (Ongoing) Impacts	371 direct and indirect jobs	1,586-5,900 total direct and indirect jobs; \$337,218,792 in labor income, intermediate inputs, and other value added	1,215-5,529 increased jobs
Jobs-Housing Balance	141,543 jobs citywide; 82,058 housing units citywide; 1.725 jobs-housing balance	143,129 jobs citywide; 85,808 housing units citywide; 1.67 jobs-housing balance	1,586 jobs resulting from the project; 3,750 new housing units; 0.055 decline jobs-housing balance, resulting in a positive shift toward the direction of a 1:1 job-housing balance.
Sources:	Studies prepared by Natelson Dale Group, Inc. (Feb. 2023) and DTA (Sep. 2023)		

<b>Table 6b: Key Fiscal Impacts Findings</b>			
<i>Topic</i>	<i>Existing Site</i>	<i>Proposed Project</i>	<i>Net Change</i>
Total Site Revenues to the City's General Fund	\$3,290,327	\$11,691,114	\$8,400,787
Total Site Expenditures from the City's General Fund (Cost of Services)	\$471,270	\$8,296,866	\$7,825,596
Net General Fund Fiscal Impact to the City	\$2,819,057	\$3,394,248	\$575,191
Sources:	Existing Site Calculations from Natelson Dale Group, Inc. February 2023 based on FY22-23 data	Proposed Project Calculations from Natelson Dale Group, Inc. February 2023, updated by DTA March 2024 after Peer Review	Estimated Net Change, based on FY22-23 data

<b>Table 6c: Land Residual Value Findings</b>			
<i>Topic</i>	<i>Existing Site</i>	<i>Proposed Project</i>	<i>Net Change</i>
Total Net Assessed Value (NAV)	-	\$2,377,266,000	
Total Costs	-	\$1,779,371,000	
Excess of NAV over Costs			\$597,895,000
Source:	Study prepared by DTA (Sep. 2023)		

<b>Table 6d: Community Benefits Impacts Findings</b>			
<i>Topic</i>	<i>Existing Site</i>	<i>Proposed Project</i>	<i>Net Change</i>
Housing Construction	0 units	3,750 units	3,750 units, providing a jobs-housing balance that exceeds the Statewide average of 1.260, and assisting the City with meeting its RHNA allocations
Affordable Housing In-Lieu Funds	\$0	Approximately \$18 million, depending on unit sizes and mixes	Approximately \$18 million, depending on unit sizes and mixes
Publicly Accessible Open Space	0 acres	13.1 acres	13.1 acres of publicly accessible open space comprised of the Bristol Plaza, Bristol Green, Bristol Central Park, the Greenlink, and other plaza and landscaped areas throughout the 41-acre site
Urban Design and Image of the City	Traditional, suburban shopping center with surface parking, no community amenities, and outdated buildings	Contemporary, iconic mixed-use urban village with mid- and high-rise structures, urban village street network, bicycle lanes, on-street parking, outdoor dining areas, and high-quality furnishings	Enhancement of the City at a key gateway intersection (Bristol Street and Sunflower Avenue), capitalizing on the success of South Coast Plaza and adjacency to the I-405 freeway
Onsite Full-Service Grocery Store	Large-format grocery store currently operating as a Vons	Large-format grocery store in Phase 1 of 2 of the project, pursuant to terms of the DA	No change
Source(s):	Study prepared by DTA (Sep. 2023)		

In addition to the EIA, FIA, LRV, and CBA analyses, a Market Study was prepared to evaluate impacts of the proposed project on the economic market area, including the residential, commercial, hotel, and senior continuum care living components. The study

concludes that given the amenity-rich environment of the project site, its location in a market area with higher than average rents, and the relatively low vacancy rates of nearby mixed-use and multiple-family residential communities, the project's residential component could be absorbed by the market area with low vacancies and rental rates above the area average. The study also concludes that despite a net loss of 115,000 square feet of commercial space on the project site, the reconfigured commercial spaces could be absorbed into the market area with the conveniences of underground parking, onsite amenities, proximity to South Coast Plaza and the I-405 freeway, and the existing two-percent (2%) retail vacancy in a two-mile radius of the project site. The reconfigured commercial spaces are expected to command a price per of at least \$40 per square foot annually, an increase of \$2.47 per square foot from the current average of \$37.53 per square foot annually.

According to the Market Study, the proposed 250 hotel room keys could also be absorbed, given low hotel room vacancy rates in the area, and given that the SP is targeting construction of a four-star hotel, similar to the Westin at South Coast. It is estimated that the value of another hotel on the project site would be approximately \$95 million, while the costs would be \$64 million, leading to an "Excess Value over Costs" ratio of about 32 percent, a figure that would attract a developer to finance construction of a four-star hotel on the project site. Lastly, the Market Study concludes that the senior continuum care facility would be valued at approximately \$106 million, with costs near \$73 million, leading to an "Excess of Value over Costs" ratio of about 36 percent, making the facility financially feasible on the project site.

The EIA, FIA, LRV, and CBA analyses, as well as the Market Study and respective peer reviews, are provided as Exhibit 10 to this report.

## **EXHIBITS**

1. Resolution certifying the Final Supplemental Environmental Impact Report No. 2022-01 , for the Related Bristol Specific Plan Project (SCH No. 2020029087), (2) adopt Environmental Findings of Fact and a Statement of Overriding Considerations for the Project pursuant to the California Environmental Quality Act, (3) adopt the Mitigation Monitoring and Reporting Program; and (4) approve the Project
2. Resolution and findings overruling the Orange County Airport Land Use Commission's Determination of Inconsistency for the Project
3. Ordinance approving Amendment Application No. 2023-03 to establish the Related Bristol Specific Plan No. 5 and to approve a zone change for the Property located at 3600 Bristol Street from General Commercial (C2) and Commercial Residential (CR) to Related Bristol Specific Plan (SP No. 5)
4. Ordinance approving Development Agreement No. 2023-02
5. Resolution approving Vesting Tentative Tract Map No. 2023-01 (County Map No. 19272), as conditioned

6. Final Supplemental Environmental Impact Report
7. Related Bristol Specific Plan and Parking Study
8. Development Agreement
9. Vesting Tentative Tract Map
10. Economic Impact, Fiscal Impact, Residual Land Value, and Community Benefit Analyses, and Market Study
11. Sunshine Ordinance Meeting Materials
12. John Wayne Airport Land Use Commission (ALUC) and California Department of Transportation (Caltrans) Division of Aeronautics Notice of Intent to Overrule and ALUC Response
13. Consistent and Supportive General Plan Goals and Policies
14. Copy of Public Notices

Submitted By:  
Ali Pezeshkpour, AICP, Planning Manager

Approved By:  
Minh Thai, Executive Director of the Planning and Building Agency