



# LETTER 3

## CITY OF ORANGE



DEPARTMENT OF COMMUNITY DEVELOPMENT

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May 3, 2004

#10-04

Mr. Jonathan Borrego  
Principal Planner  
City of Anaheim Planning Department  
200 South Anaheim Boulevard, Suite 162  
Anaheim, CA 92805

Dear Mr. Borrego,

**Subject: Draft Environmental Impact Report (EIR) No. 330 for the City of Anaheim's General Plan and Zoning Code Update**

Thank you for transmitting Draft EIR No. 330 for the City of Anaheim's General Plan and Zoning Code Update to the City of Orange (City) for review. The project consists of a comprehensive update to the General Plan including development of a mixed-use overlay zone affecting the Platinum Triangle area near the Anaheim Stadium. The project also includes a zoning code update, and amendments to the Anaheim Resort Specific Plan, Northeast Area Specific Plan, Cypress Canyon Specific Plan, and the Mountain Park Specific Plan.

The City has reviewed Draft EIR No. 330 and feels that it does not adequately address environmental impacts related to traffic. As such, the City would appreciate consideration of the following comments:

1. In the City's response letter to the Notice of Preparation (NOP) for the Anaheim General Plan Update dated May 12, 2003, the City requested that the Draft EIR "include an analysis of impacts to transportation infrastructure in the City of Orange, resulting from changes in the proposed General Plan."

The Draft EIR and the accompanying traffic impact study do not analyze traffic impacts to intersections or arterial segments in the City of Orange.

Traffic from development in the City of Anaheim does not stop at Anaheim's borders, and affects the circulation system within the City of Orange. For example, traffic from events at the Anaheim Stadium use Orangewood Avenue, Katella Avenue, and State College/The City Drive; traffic from events at the

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Arrowhead Pond use Katella Avenue to access SR-55; and residential uses in Anaheim Hills use Meats Avenue and Santiago Boulevard in Orange to bypass congestion on SR-91. Therefore, any change in the Anaheim General Plan that would allow intensification of development beyond existing conditions would generate additional traffic that could affect infrastructure within the City of Orange.

Specifically, the update to the Anaheim General Plan involves a reclassification of land uses within the Platinum Triangle to a "mixed-use" land use designation. The mixed-use designation would allow up to 9,175 dwelling units, up to 3.2 million square feet of office development, and up to 2 million square feet of commercial development. Areas within the Platinum Triangle would also be designated Office High and Office Low allowing 1.7 million square feet of office development. This reclassification would result in intensification of development compared to existing conditions, and degradation of Levels of Service on surrounding roadways. The Platinum Triangle is located adjacent to City of Orange boundaries; therefore, its impacts to City of Orange infrastructure must be evaluated.

An analysis of the following intersections (and any others within the City of Orange where traffic levels are projected to increase due to changes in development potential in Anaheim) should be included in the EIR:

- Main Street & Katella Avenue
- Eckhoff Street & Orangewood Avenue
- The City Drive & Chapman Avenue
- Lewis Street & Chapman Avenue
- Santiago Boulevard & Nohl Ranch Road
- Santiago Boulevard & Meats Avenue
- Cannon Street & Santiago Canyon Road
- Cannon Street & Serrano Avenue

2. Section 2.2.1 (Freeways) in the Draft EIR describes future improvements for both the State Route 57 and State Route 91. It is unclear from the text whether or not these enhancements are included in the model runs for build out conditions. Please clarify in the EIR text whether these future freeway improvements are assumed in the analysis.

3. Page 284 of the Draft EIR describes existing volumes on State College Boulevard between I-5 and SR-22 as ranging from 50,000 to 60,000 vehicles per day. These volumes are incorrect. The existing volume on State College (The City Drive) south of I-5 is 30,200 vehicles per day. Please correct the volumes in the text of the EIR and any associated analyses.

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Thank you for the opportunity to comment on the Draft EIR for the City of Anaheim General Plan Update. The City looks forward to reviewing the responses to comments and Final EIR upon completion. Should you have any questions, please feel free to contact Mr. Doug Keys, Traffic Analyst with the City of Orange, at (714) 744 5540.

Sincerely,



Alice Angus

Community Development Director

cc: Anna Pehoushek, Acting Principal Planner  
Jennifer McDonald, Environmental Review Coordinator  
Thomas Mahood, City Traffic Engineer  
Doug Keys, Traffic Analyst

## 2. Response to Comments

### 3. Response to Comments From Alice Angus, Community Development Director, City of Orange Dated May 3, 2004

3-1 Overall development intensity in the City of Anaheim is lower in the Recommended General Plan than in the City's current General Plan, so traffic volumes generated in Anaheim which travel on City of Orange streets will generally be less under the recommended plan than under the current plan. Land uses envisioned under the current plan would generate a total of 3,443,000 daily trips citywide, whereas land uses envisioned under the recommended plan would generate 2,754,000 daily trips.

Pursuant to your request, the ATAM traffic forecasting model was used to identify changes in traffic levels of service at the eight intersections identified by the City of Orange in its comment letter. The comparison of volume/capacity ratio and Level of Service is shown in the tables below.

#### AM Peak Hour

Location	Exis vol/cap	Exis LOS	Curr. GP vol/cap	Curr. GP LOS	Rec. GP vol/cap	Rec. GP LOS
Main @ Katella	0.52	A	0.57	A	0.53	A
Eckhoff @ Orangewood	0.56	A	0.66	B	0.59	A
City Drive @ Chapman	0.60	A	0.71	C	0.88	D
Lewis @ Chapman	0.64	B	0.50	A	0.53	A
Santiago @ Nohl Ranch	0.69	B	0.79	C	0.72	C
Santiago @ Meats	0.93	E	0.84	D	0.90	D
Cannon @ Santiago Cyn	0.90	D	1.31	F	1.30	F
Cannon @ Serrano	0.69	B	0.81	D	0.84	D

#### PM Peak Hour

Location	Exis vol/cap	Exis LOS	Curr. GP vol/cap	Curr. GP LOS	Rec. GP vol/cap	Rec. GP LOS
Main @ Katella	0.64	B	0.77	C	0.71	C
Eckhoff @ Orangewood	0.72	C	0.76	C	0.80	C
City Drive @ Chapman	0.81	D	0.95	E	0.87	D
Lewis @ Chapman	0.84	D	0.68	B	0.63	B
Santiago @ Nohl Ranch	0.60	A	0.75	C	0.65	C
Santiago @ Meats	0.75	C	0.78	C	0.79	C
Cannon @ Santiago Cyn	1.01	F	1.19	F	1.17	F
Cannon @ Serrano	0.52	A	0.78	C	0.81	D

- Considering that the General Plan is a long-range planning document, it is difficult to determine how much of the future traffic at City of Orange intersections is related to projects within the City of Anaheim. However, Mitigation Measures 5.15-4 and 5.15-5 have been included in DEIR to ensure that future traffic studies are completed as development applications are submitted. In addition, these mitigation measures require that future projects provide "fair-share" funding to mitigate any

## 2. *Response to Comments*

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project-related impacts, including impacts to intersections located outside the City of Anaheim. As a result, traffic impacts associated with the proposed General Plan and Zoning Update have been mitigated to a level of insignificance, as described in the DEIR.

- 3-2 Auxiliary lanes do not add mainline capacity, so they are not included in the future model forecasts. The proposed general purpose lanes on SR-91 between SR-55 and Riverside County are not included in the future forecast since they are not yet committed improvements and will be studied as part of the upcoming SR-91 Major Corridor Study. The additional northbound general purpose lane on SR-57 at SR-91 is included in the future forecast.
- 3-3 The existing volume on State College Boulevard south of I-5 will be corrected to reflect the current volume of approximately 30,200 vehicles per day. This change is included in Section 3 of this Final EIR/Response to Comments.



## 2. *Response to Comments*

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