

City of Garden Grove

Site C

Subsequent Mitigated Negative Declaration

Response to Comments (RTC)



**Prepared by
City of Garden Grove**

October 2017

1.0 WRITTEN COMMENT LETTERS AND RESPONSES:

This document provides responses to the written comments made on the Draft Subsequent Mitigated Negative Declaration (MND) during the Office of Planning and Research (OPR) published public review and comment period of September 25, 2017 to October 24, 2017 and the City's public review and comment period from September 26, 2017 to October 26, 2017. The comment letters received on the Draft Subsequent MND are numbered, as listed below, and are included in the following pages along with the formal responses prepared for the comments. To assist in referencing comments and responses, each specific comment is numbered and refers to a statement or paragraph in the corresponding letter. All correspondence from those agencies or individual comments on the Draft Subsequent MND is reproduced on the following pages. Following each comment letter are responses to each letter.

1.1 Comment Letters

A total of three (3) written comment letters were received at the end of the 30-day public review period.

1. State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, letter dated October 25, 2017
2. Department of Transportation, letter dated October 25, 2017.
3. City of Anaheim, Planning and Building Department, letter dated October 26, 2017.

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EDMUND G. BROWN JR.
GOVERNOR

October 25, 2017

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Maria Parra
City of Garden Grove
11222 Acacia Parkway
P.O. Box 3070
Garden Grove, CA 92842

Subject: Site C
SCH#: 2012081036

Dear Maria Parra:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on October 24, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2012081036
Project Title Site C
Lead Agency Garden Grove, City of

Type MND Mitigated Negative Declaration
Description Note: Subsequent MND

The Site C project was originally approved in 2012. The 2012 project called for the development of: 1 full service hotel; 2 limited service hotels; conference/meeting/banquet space; several restaurants; and an indoor entertainment venue on a 5.2 acre site. The 2012 project called for 789 hotel rooms that range from 10 to 19 stories and a multi-level parking garage with 1,297 total spaces.

Lead Agency Contact

Name Maria Parra
Agency City of Garden Grove
Phone (714) 741-5312 **Fax**
email
Address 11222 Acacia Parkway
P.O. Box 3070
City Garden Grove **State** CA **Zip** 92842

Project Location

County Orange
City Garden Grove
Region
Lat / Long 33° 47' 3.15" N / 117° 54' 50.1" W
Cross Streets Northwest corner of Harbor Boulevard and Twintree Lane, west of Choisser Road
Parcel No.
Township 4S **Range** 10W **Section** 34 **Base**

Proximity to:

Highways SR 22, I-5, SR 57
Airports
Railways
Waterways
Schools Lampson, Parkview
Land Use vacant lot/planned unit development no. PUD-128-12/International west mixed use

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Agricultural Land; Forest Land/Fire Hazard

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 12; Office of Emergency Services, California; Department of Housing and Community Development; Regional Water Quality Control Board, Region 8; State Water Resources Control Board, Division of Drinking Water; Native American Heritage Commission

Date Received 09/25/2017 **Start of Review** 09/25/2017 **End of Review** 10/24/2017

Note: Blanks in data fields result from insufficient information provided by lead agency.

**1. RESPONSE TO COMMENT FROM SCOTT MORGAN, DIRECTOR, STATE
CLEARINGHOUSE, GOVERNOR'S OFFICE OF PLANNING AND RESEARCH (OPR), STATE
OF CALIFORNIA**

The comment acknowledges compliance with the CEQA MND public review requirements and requires no further response.

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION**DISTRICT 12**

1750 EAST FOURTH STREET, SUITE 100

SANTA ANA, CA 92705

PHONE (657) 328-6267

FAX (657) 328-6510

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

October 25, 2017

Ms. Maria Parra
City of Garden Grove
11222 Acacia Parkway
Garden Grove, CA 92842

File: IGR/CEQA
SCH#: 2012081036
IGR LOG # 2017-00717
SR22
PM 8.549

Dear Ms. Parra,

Thank you for continuing to include the California Department of Transportation (Caltrans) in the review of the Mitigated Negative Declaration for the Site C Project. The Modified Project consists of development of two full-service hotels, one limited-service hotel (Twintree Lane Hotel), conference/meeting banquet space, several restaurants and bars, retail uses, and pools (including a surf pool), on an approximately 4.3-acre site in the City of Garden Grove. Specifically, the Modified Project would consist of 769 rooms, approximately 39,867 square feet of conference/meeting banquet space, 36,885 square feet of restaurant/retail/entertainment space, 24,014 square feet of hotel restaurant space, 26,090 square feet of additional hotel ancillary uses (i.e., gyms, spas, salon, a hotel shop, and a kids' club), and a total of 1,297 above- and below-ground parking spaces. Three access driveways, two along Harbor Boulevard and one along Twintree Lane would serve the project site. The Modified Project is located at the northeast corner of Harbor Boulevard and Twintree Lane, south of the Target Shopping Center parking lot, and west of Choisser Road. Regional access to the project site is provided by State Route (SR) 22.

Caltrans is a responsible agency on this project and has the following comments:

Traffic Operations

1. Please provide the queuing analysis for the following locations including on and off-ramps for SR22:
 - Intersection No.12- Harbor Boulevard at SR22 westbound off-ramp/Banner Drive.
 - Intersection No.13- Harbor Boulevard at Trask Avenue.
 - Intersection No.14- SR22 eastbound on-ramp at Trask Avenue.

Caltrans-1

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

City of Garden Grove
October 25, 2017
Page 2

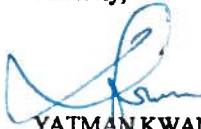
Encroachment Permit

1. Any project work proposed within Caltrans Right-of-Way requires an Encroachment Permit and all environmental concerns must be addressed. If the environmental documentation for the project does not meet Caltrans requirements, additional documentation would be required before approval of the encroachment permit. For application forms and specific details on Caltrans Encroachment Permits procedure, please refer to Encroachment Permits Manual. The latest edition of the Manual is available on: <http://www.dot.ca.gov/trafficops/ep/apps.html>

Caltrans-2

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Maryam Molavi, at (657) 328-6280 or [Maryam.Molavi@dot.ca.gov](mailto:Molavi@dot.ca.gov).

Sincerely,



YATMAN KWAN, AICP
Acting Branch Chief, Regional-IGR-Transit Planning
District 12

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

2. RESPONSES TO COMMENTS FROM YATMAN KWAN, AICP, ACTING BRANCH CHIEF, REGIONAL-IGR-TRANSIT PLANNING, DISTRICT 12, DEPARTMENT OF TRANSPORTATION

Caltrans-1 In response to Caltrans-1 Comment, a supplemental queuing analysis has been prepared at the three requested locations shown below. This queuing analysis is based on the Highway Capacity Manual 2010 methodology. The 95th percentile queue is reported using Synchro 10 analysis software. Traffic volume data is based on the September 13, 2017 Traffic Study.

1. Intersection No. 12 – Harbor Boulevard at SR22 westbound off-ramp/Banner Drive:

Table 1 below shows the results of the queuing analysis at the intersection of Harbor Boulevard at SR22 westbound off-ramp/Banner Drive. The project may cause vehicle queue to increase by as much as 36 feet during the PM peak hour for the southbound through movement on Harbor Boulevard. This is equivalent to approximately 1.4 additional vehicles per lane.

2. Intersection No. 13 – Harbor Boulevard at Trask Avenue:

Table 2 below shows the results of the queuing analysis at the intersection of Harbor Boulevard at Trask Avenue. The project may cause vehicle queue to increase by as much as 44 feet during the AM peak hour for the northbound right turn movement on Harbor Boulevard. This is equivalent to approximately 1.8 additional vehicles per lane.

3. Intersection No. 14 – SR22 on-ramp at Trask Avenue:

Table 3 below shows the results of the queuing analysis at the intersection of SR22 on-ramp at Trask Avenue. The project may cause vehicle queue to increase by as much as 50 feet during the AM peak hour for the eastbound left turn movement on Trask Avenue. This is equivalent to approximately 2 additional vehicles per lane.

This queuing analysis has been provided for informational purposes only. The project related traffic impact at the study area intersections is based on level of service standards established by the City of Garden Grove and Caltrans. Based on the results of the level of service analysis, all study area intersections will operate at acceptable levels of service with the recommended project mitigation measures and the project impact is considered less than significant. The queuing analysis report sheets are provided in Attachment A.

TABLE 1
Queue Analysis for Harbor Boulevard at Banner Dr/SR-22 WB Ramps

AM Peak Hour Queue												
Analysis Scenario	Northbound			Southbound			Eastbound			Westbound		
	L	T	R	L	T	R	L	T	R	L	T	R
Opening Year (2021) Without Project	101 ft.	326 ft.	--	--	530 ft.	--	--	150 ft.	--	590 ft.	592 ft.	42 ft.
Opening Year (2021) With Project	101 ft.	340 ft.	--	--	556 ft.	--	--	150 ft.	--	590 ft.	592 ft.	46 ft.
Increase from Project (ft.)	0 ft.	14 ft.	--	--	26 ft.	--	--	0 ft.	--	0 ft.	0 ft.	4 ft.

PM Peak Hour Queue												
Analysis Scenario	Northbound			Southbound			Eastbound			Westbound		
	L	T	R	L	T	R	L	T	R	L	T	R
Opening Year (2021) Without Project	169 ft.	400 ft.	--	--	465 ft.	--	--	90 ft.	--	380 ft.	390 ft.	49 ft.
Opening Year (2021) With Project	169 ft.	420 ft.	--	--	501 ft.	--	--	90 ft.	--	380 ft.	390 ft.	75 ft.
Increase from Project (ft.)	0 ft.	20 ft.	--	--	36 ft.	--	--	0 ft.	--	0 ft.	0 ft.	26 ft.

¹ Queue length is based on the Highway Capacity Manual (HCM) 2010 methodology. 95th percentile queue is reported per lane. Traffic volume is based the Site C Mixed Use Hotel Traffic Impact Study (9/13/17).

² -- = Movement does not have a dedicated lane; turning movement queue is combined and reported with thru movement queue.

TABLE 2
Queue Analysis for Harbor Boulevard at Trask Avenue

AM Peak Hour Queue												
Analysis Scenario	Northbound			Southbound			Eastbound			Westbound		
	L	T	R	L	T	R	L	T	R	L	T	R
Opening Year (2021) Without Project	103 ft.	212 ft.	299 ft.	348 ft.	335 ft.	28 ft.	125 ft.	245 ft.	272 ft.	128 ft.	185 ft.	219 ft.
Opening Year (2021) With Project	80 ft.	211 ft.	343 ft.	373 ft.	347 ft.	29 ft.	136 ft.	245 ft.	213 ft.	139 ft.	185 ft.	234 ft.
Increase from Project (ft.)	-23 ft.	-1 ft.	44 ft.	25 ft.	12 ft.	1 ft.	11 ft.	0 ft.	-59 ft.	11 ft.	0 ft.	15 ft.

PM Peak Hour Queue												
Analysis Scenario	Northbound			Southbound			Eastbound			Westbound		
	L	T	R	L	T	R	L	T	R	L	T	R
Opening Year (2021) Without Project	125 ft.	424 ft.	198 ft.	391 ft.	294 ft.	45 ft.	251 ft.	269 ft.	255 ft.	137 ft.	287 ft.	301 ft.
Opening Year (2021) With Project	119 ft.	434 ft.	184 ft.	426 ft.	310 ft.	46 ft.	263 ft.	234 ft.	286 ft.	172 ft.	287 ft.	315 ft.
Increase from Project (ft.)	-6 ft.	10 ft.	-14 ft.	35 ft.	16 ft.	1 ft.	12 ft.	-35 ft.	31 ft.	35 ft.	0 ft.	14 ft.

¹ Queue length is based on the Highway Capacity Manual (HCM) 2010 methodology; 95th percentile queue is reported per lane. Traffic volume is based the Site C Mixed Use Hotel Traffic Impact Study (9/13/17).

² * = Movement does not have a dedicated lane; turning movement queue is combined and reported with thru movement queue.

TABLE 3
Queue Analysis for SR-22 EB Ramps at Trask Avenue

AM Peak Hour Queue

Analysis Scenario	Northbound			Southbound			Eastbound			Westbound		
	L	T	R	L	T	R	L	T	R	L	T	R
Opening Year (2021) Without Project	n/a	n/a	n/a	n/a	n/a	n/a	96 ft.	0 ft.	n/a	n/a	117 ft.	--
Opening Year (2021) With Project	n/a	n/a	n/a	n/a	n/a	n/a	146 ft.	0 ft.	n/a	n/a	162 ft.	--
Increase from Project (ft.)	n/a	n/a	n/a	n/a	n/a	n/a	50 ft.	0 ft.	n/a	n/a	45 ft.	--

PM Peak Hour Queue

Analysis Scenario	Northbound			Southbound			Eastbound			Westbound		
	L	T	R	L	T	R	L	T	R	L	T	R
Opening Year (2021) Without Project	n/a	n/a	n/a	n/a	n/a	n/a	116 ft.	0 ft.	n/a	n/a	121 ft.	--
Opening Year (2021) With Project	n/a	n/a	n/a	n/a	n/a	n/a	123 ft.	0 ft.	n/a	n/a	125 ft.	--
Increase from Project (ft.)	n/a	n/a	n/a	n/a	n/a	n/a	7 ft.	0 ft.	n/a	n/a	4 ft.	--

¹ Queue length is based on the Highway Capacity Manual (HCM) 2010 methodology. 95th percentile queue is reported per lane. Traffic volume is based the Site C Mixed Use Hotel Traffic Impact Study (9/13/17).

² -- = Movement does not have a dedicated lane; turning movement queue is combined and reported with thru movement queue.

³ N/A = Movement no present at intersection.

Attachment A
Queuing Analysis Report Sheets

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

12: Harbor Boulevard & Banner Drive/CA-22 WB Off-Ramp

10/27/2017



Lane Group	EBT	WBL	WBT	WBR	NBL	NBT	SBT
Lane Group Flow (vph)	218	522	526	134	62	1470	1748
v/c Ratio	0.75	0.99	0.99	0.23	0.71	0.66	0.92
Control Delay	38.0	72.5	71.7	5.8	93.4	23.5	39.7
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	38.0	72.5	71.7	5.8	93.4	23.5	39.7
Queue Length 50th (ft)	70	334	336	0	32	256	383
Queue Length 95th (ft)	150	#590	#592	42	#101	326	#530
Internal Link Dist (ft)	455		799			727	1778
Turn Bay Length (ft)		400		400	67		
Base Capacity (vph)	361	526	530	587	73	2229	1892
Starvation Cap Reductn	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0
Reduced v/c Ratio	0.60	0.99	0.99	0.23	0.71	0.66	0.92

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

12: Harbor Boulevard & Banner Drive/CA-22 WB Off-Ramp

10/27/2017



Lane Group	EBT	WBL	WBT	WBR	NBL	NBT	SBT
Lane Group Flow (vph)	171	347	356	163	122	2010	1778
v/c Ratio	0.61	0.90	0.92	0.33	0.82	0.76	0.91
Control Delay	23.8	61.1	62.9	7.1	78.9	18.9	33.1
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	23.8	61.1	62.9	7.1	78.9	18.9	33.1
Queue Length 50th (ft)	30	184	189	0	63	284	309
Queue Length 95th (ft)	90	#380	#390	49	#169	400	#465
Internal Link Dist (ft)	455		799			727	1778
Turn Bay Length (ft)		400		400	67		
Base Capacity (vph)	416	384	389	487	149	2632	1954
Starvation Cap Reductn	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0
Reduced v/c Ratio	0.41	0.90	0.92	0.33	0.82	0.76	0.91

Intersection Summary













95th percentile volume exceeds capacity, queue may be longer.

Queue shown is maximum after two cycles.

Queues
13: Trask Avenue & Harbor Boulevard

SITE C MIXED USE TIS (JN: 0762-2016-01)

10/27/2017

												
Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Group Flow (vph)	103	653	425	105	257	936	72	1030	527	400	1870	136
v/c Ratio	0.73	0.87	0.87	0.74	0.65	0.64	0.77	0.80	0.76	0.94	0.84	0.18
Control Delay	64.7	42.4	37.0	66.4	35.6	14.6	83.6	31.9	23.6	62.4	22.9	3.2
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	64.7	42.4	37.0	66.4	35.6	14.6	83.6	31.9	23.6	62.4	22.9	3.2
Queue Length 50th (ft)	48	155	108	49	110	152	34	164	157	183	271	0
Queue Length 95th (ft)	#125	#245	#272	#128	185	219	#103	212	#299	#348	335	28
Internal Link Dist (ft)		264			619			257			727	
Turn Bay Length (ft)				100		100				100		
Base Capacity (vph)	141	754	486	141	397	1456	94	1288	692	424	2237	772
Starvation Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.73	0.87	0.87	0.74	0.65	0.64	0.77	0.80	0.76	0.94	0.84	0.18

Intersection Summary













95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

13: Trask Avenue & Harbor Boulevard

10/27/2017

												
Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Group Flow (vph)	204	612	474	114	278	905	128	1548	407	371	1380	227
v/c Ratio	0.94	0.87	0.83	0.64	0.84	0.73	0.50	0.98	0.52	0.99	0.72	0.31
Control Delay	90.0	49.1	25.6	57.0	59.2	23.8	43.1	49.7	15.3	82.9	26.5	3.9
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	90.0	49.1	25.6	57.0	59.2	23.8	43.1	49.7	15.3	82.9	26.5	3.9
Queue Length 50th (ft)	117	178	83	63	154	219	68	317	114	212	241	0
Queue Length 95th (ft)	#251	#269	#255	#137	#287	301	125	#424	198	#391	294	45
Internal Link Dist (ft)		264			619			257			727	
Turn Bay Length (ft)				100		100				100		
Base Capacity (vph)	216	707	571	177	331	1242	255	1582	780	373	1921	739
Starvation Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.94	0.87	0.83	0.64	0.84	0.73	0.50	0.98	0.52	0.99	0.72	0.31

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

14: Trask Avenue & CA-22 EB On-Ramp

10/27/2017



Lane Group	EBL	EBT	WBT
Lane Group Flow (vph)	743	1004	1069
v/c Ratio	0.65	0.54	0.68
Control Delay	13.8	1.1	10.6
Queue Delay	0.0	0.0	0.0
Total Delay	13.8	1.1	10.6
Queue Length 50th (ft)	68	0	85
Queue Length 95th (ft)	96	0	117
Internal Link Dist (ft)		619	392
Turn Bay Length (ft)	260		
Base Capacity (vph)	1322	1859	1744
Starvation Cap Reductn	0	0	0
Spillback Cap Reductn	0	0	0
Storage Cap Reductn	0	0	0
Reduced v/c Ratio	0.56	0.54	0.61

Intersection Summary

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

14: Trask Avenue & CA-22 EB On-Ramp

10/27/2017



Lane Group	EBL	EBT	WBT
Lane Group Flow (vph)	636	687	820
v/c Ratio	0.54	0.37	0.53
Control Delay	12.7	0.6	9.3
Queue Delay	0.0	0.0	0.0
Total Delay	12.7	0.6	9.3
Queue Length 50th (ft)	50	0	53
Queue Length 95th (ft)	116	0	121
Internal Link Dist (ft)		619	392
Turn Bay Length (ft)	260		
Base Capacity (vph)	2209	1863	2777
Starvation Cap Reductn	0	0	0
Spillback Cap Reductn	0	0	0
Storage Cap Reductn	0	0	0
Reduced v/c Ratio	0.29	0.37	0.30

Intersection Summary

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

12: Harbor Boulevard & Banner Drive/CA-22 WB Off-Ramp

10/27/2017



Lane Group	EBT	WBL	WBT	WBR	NBL	NBT	SBT
Lane Group Flow (vph)	218	522	525	164	52	1515	1800
v/c Ratio	0.75	0.99	0.99	0.27	0.71	0.68	0.95
Control Delay	38.0	72.5	71.7	5.5	93.4	24.0	43.1
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	38.0	72.5	71.7	5.5	93.4	24.0	43.1
Queue Length 50th (ft)	70	334	336	0	32	267	-406
Queue Length 95th (ft)	150	#590	#592	46	#101	340	#556
Internal Link Dist (ft)	455		799			727	1778
Turn Bay Length (ft)		400		400	67		
Base Capacity (vph)	361	526	530	608	73	2229	1892
Starvation Cap Reductn	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0
Reduced v/c Ratio	0.60	0.99	0.99	0.27	0.71	0.68	0.95

Intersection Summary

- Volume exceeds capacity, queue is theoretically infinite.
Queue shown is maximum after two cycles.
- # 95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

12: Harbor Boulevard & Banner Drive/CA-22 WB Off-Ramp

10/27/2017

	→	↙	←	↖	↗	↑	↓
Lane Group	EBT	WBL	WBT	WBR	NBL	NBT	SBT
Lane Group Flow (vph)	171	347	356	204	122	2072	1859
v/c Ratio	0.61	0.90	0.92	0.42	0.82	0.79	0.96
Control Delay	23.8	61.1	62.9	10.6	78.9	19.6	37.9
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	23.8	61.1	62.9	10.6	78.9	19.6	37.9
Queue Length 50th (ft)	30	184	189	15	63	299	332
Queue Length 95th (ft)	90	#880	#890	75	#169	420	#501
Internal Link Dist (ft)	465		799			727	1778
Turn Bay Length (ft)		400		400	67		
Base Capacity (vph)	416	384	389	490	149	2632	1954
Starvation Cap Reductn	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0
Reduced v/c Ratio	0.41	0.90	0.92	0.42	0.82	0.79	0.96

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.













Queue shown is maximum after two cycles.

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

13: Trask Avenue & Harbor Boulevard

10/30/2017

												
Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Group Flow (vph)	103	653	425	105	257	965	72	1046	527	421	1880	136
v/c Ratio	0.87	0.88	0.67	0.89	0.66	0.67	0.51	0.77	0.92	0.99	0.86	0.18
Control Delay	93.0	43.5	20.4	96.4	36.0	15.5	46.9	29.8	40.4	72.6	24.8	3.3
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	93.0	43.5	20.4	96.4	36.0	15.5	46.9	29.8	40.4	72.6	24.8	3.3
Queue Length 50th (ft)	49	155	113	50	110	164	33	164	161	195	280	0
Queue Length 95th (ft)	#136	#245	213	#139	185	234	#80	211	#343	#373	347	29
Internal Link Dist (ft)		264			619			267			727	
Turn Bay Length (ft)				100		100				100		
Base Capacity (vph)	118	757	631	118	398	1444	141	1360	574	425	2179	756
Starvation Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.87	0.86	0.67	0.89	0.65	0.67	0.51	0.77	0.92	0.99	0.86	0.18

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.













Queue shown is maximum after two cycles.

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

13: Trask Avenue & Harbor Boulevard

10/30/2017

												
Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Group Flow (vph)	204	612	474	114	278	948	128	1570	407	405	1398	227
v/c Ratio	1.04	0.80	0.72	0.96	0.87	0.75	0.55	0.99	0.63	1.03	0.68	0.29
Control Delay	115.1	41.9	26.1	118.0	62.7	24.0	44.6	51.2	16.4	88.2	24.7	4.0
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	115.1	41.9	26.1	118.0	62.7	24.0	44.6	51.2	16.4	88.2	24.7	4.0
Queue Length 50th (ft)	~126	173	193	66	154	231	69	323	83	~249	234	0
Queue Length 95th (ft)	#263	234	286	#172	#287	315	119	#434	184	#426	310	46
Internal Link Dist (ft)		264			619			267			727	
Turn Bay Length (ft)				100		100				100		
Base Capacity (vph)	197	791	732	119	333	1263	316	1592	649	395	2055	775
Starvation Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Reduced v/c Ratio	1.04	0.77	0.65	0.96	0.83	0.75	0.41	0.99	0.63	1.03	0.68	0.29

Intersection Summary

- ~ Volume exceeds capacity, queue is theoretically infinite.
Queue shown is maximum after two cycles.
- # 95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

14: Trask Avenue & CA-22 EB On-Ramp

10/27/2017



Lane Group	EBL	EBT	WBT
Lane Group Flow (vph)	767	1004	1069
v/c Ratio	0.66	0.54	0.64
Control Delay	16.7	1.1	11.3
Queue Delay	0.0	0.0	0.0
Total Delay	16.7	1.1	11.3
Queue Length 50th (ft)	87	0	100
Queue Length 95th (ft)	146	0	162
Internal Link Dist (ft)		619	392
Turn Bay Length (ft)	260		
Base Capacity (vph)	1705	1860	2367
Starvation Cap Reductn	0	0	0
Spillback Cap Reductn	0	0	0
Storage Cap Reductn	0	0	0
Reduced v/c Ratio	0.45	0.54	0.45

Intersection Summary

Queues

SITE C MIXED USE TIS (JN: 0762-2016-01)

14: Trask Avenue & CA-22 EB On-Ramp

10/27/2017



Lane Group	EBL	EBT	WBT
Lane Group Flow (vph)	669	687	820
v/c Ratio	0.56	0.37	0.54
Control Delay	12.8	0.6	9.7
Queue Delay	0.0	0.0	0.0
Total Delay	12.8	0.6	9.7
Queue Length 50th (ft)	53	0	55
Queue Length 95th (ft)	123	0	125
Internal Link Dist (ft)		619	392
Turn Bay Length (ft)	260		
Base Capacity (vph)	2269	1863	2674
Starvation Cap Reductn	0	0	0
Spillback Cap Reductn	0	0	0
Storage Cap Reductn	0	0	0
Reduced v/c Ratio	0.29	0.37	0.31

Intersection Summary

Caltrans-2 The comment is acknowledged. Should any work be performed within the Caltrans Right- of-Way, an Encroachment Permit will be obtained in accordance with the Caltrans procedures prior to the start of the work.



City of Anaheim
PLANNING AND BUILDING DEPARTMENT

October 26, 2017

Maria Parra
 Senior Planner
 City of Garden Grove Planning Division
 11222 Acacia Parkway
 Garden Grove, CA 92840

by email to: mariap@ci.garden-grove.ca.us

Subject: City of Garden Grove Notice of Intent to Adopt a Subsequent Mitigated
 Negative Declaration for Site C

Dear Ms. Parra:

Thank you for the opportunity to review and comment on the above-referenced document. City of Anaheim interdepartmental staff has reviewed the document. The Public Works Department, Traffic Engineering Division has provided the comments below. Please contact Linda Johnson, Principal Planner at (714) 765-4957 or ljohnson@anaheim.net with questions pertaining to these comments.

- Regarding "DF-TR-23 Provide shuttle service to Disneyland, the Anaheim Convention Center and other popular attractions in the area" (Page 66 in the Traffic and Transportation Section), City staff recommends that the Property Owner/Developer participate in the Anaheim Transportation Network (ATN), which operates the Anaheim Resort Transportation (ART) buses. ATN has a franchise with the City of Anaheim to operate ART buses to provide transportation on regular routes to destinations in and around The Anaheim Resort. ATN was formed to mitigate traffic in The Anaheim Resort by consolidating vehicle trips to a regular bus operation. Through the franchise with the City, ART also operates limited routes to other cities such as Garden Grove.
- Regarding Exhibit 3-4 (City of Garden Grove Master Plan of Bikeway Facilities) – This map shows bike lanes on Katella Avenue in the City of Anaheim which is not consistent with the City of Anaheim's recently adopted Bicycle Master Plan (adopted on May 23, 2017, see page 31 of the following link: <http://www.anaheim.net/DocumentCenter/Home/View/2027>).

Anaheim-1

Anaheim-2

Please forward any subsequent public notices regarding this project to my attention at the address listed at the bottom of the first page of this letter. If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5238 or csaunders@anaheim.net.

200 S Anaheim Blvd
 Suite #162
 Anaheim, CA 92805
 Tel (714) 765-5139
 Fax (714) 765-5280
www.anaheim.net

LETTER 3
cont'd

Ms. Parra
October 26, 2017
Page 2 of 2

Sincerely,

A handwritten signature in blue ink that reads "Christine Saunders". The signature is written in a cursive style with a horizontal line at the end.

Christine Saunders
Associate Planner

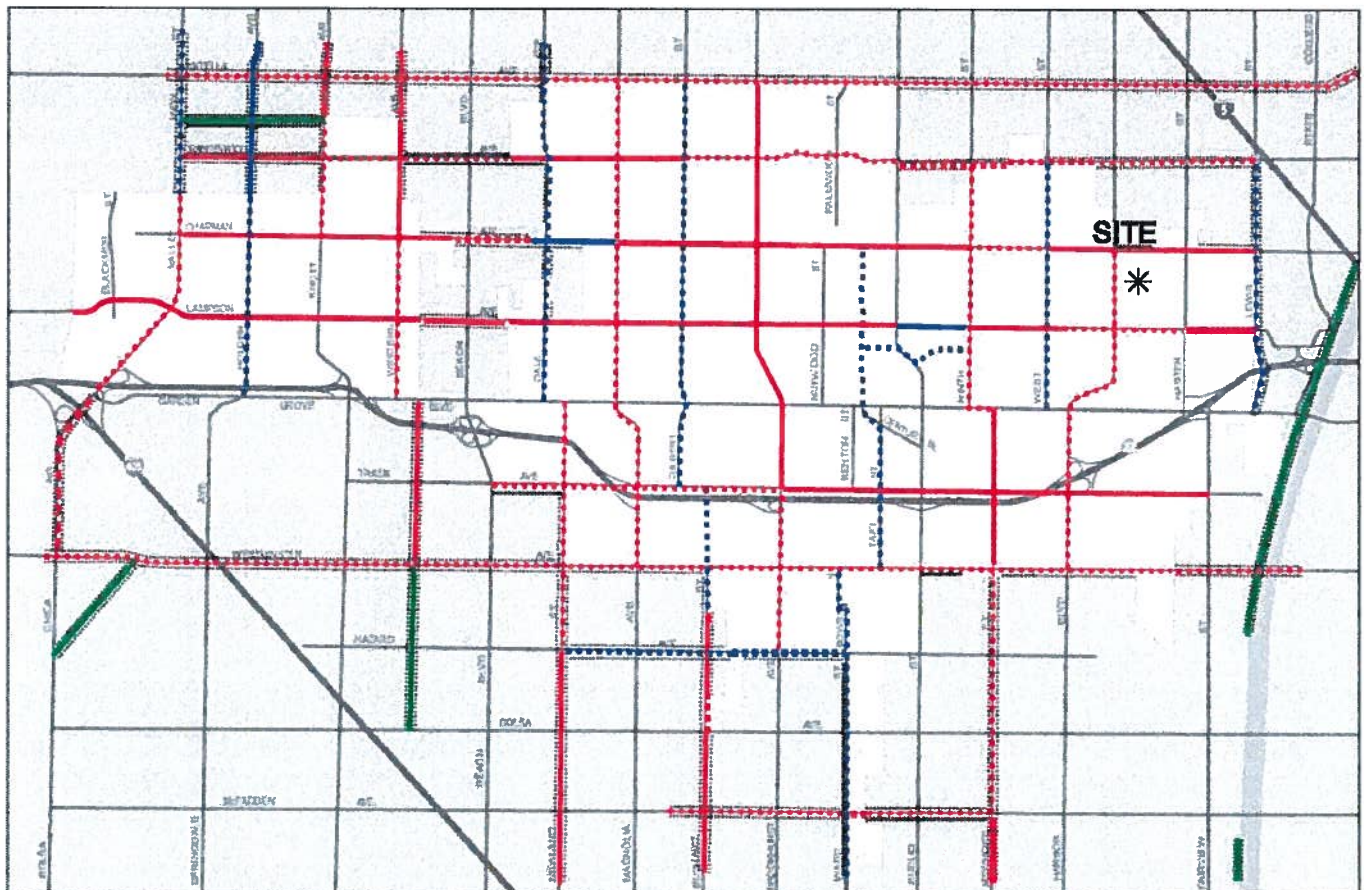
Cc: Linda Johnson, Public Works Department, Traffic Engineering
Jamie Lai, Public Works Department, Traffic Engineering

3. RESPONSES TO COMMENTS FROM CHRISTINE SAUNDERS, ASSOCIATE PLANNER, CITY OF ANAHEIM, PLANNING AND BUILDING DEPARTMENT

Anaheim-1 The comment is acknowledged and will be shared with the Property Owner/Developer for their consideration. Since this comment does not raise an issue regarding the environmental analysis contained in the Draft Subsequent MND, no further action is required.

Anaheim-2 The comment is acknowledged. Please note that Exhibit 3-4 of the Traffic Impact Study was based on the City of Garden Grove Bikeway Master Plan. However, to address this discrepancy (bike lanes on Katella Avenue) between the City of Garden Grove Bikeway Master Plan and the City of Anaheim Bicycle Master Plan, a note has been added to Exhibit 3-4 to correct this issue. See the revised Exhibit 3-4 on the next page.

Exhibit 3-4 City of Garden Grove Master Plan of Bikeway Facilities



Please note that the bike lanes on Katella Avenue are no longer proposed per the City of Anaheim Bicycle Master Plan which was adopted on May 23, 2017.

Legend:

City of Garden Grove

Existing	Proposed	
		Class I Bike Trail (Off Street Trail)
		Class II Bike Lanes (On-Street Striped Lanes)
		Class III Bike Route (On-Street Signed Route)

County of Orange and Adjacent Cities

Existing	Proposed	
		Class I Bike Trail (Off Street Trail)
		Class II Bike Lanes (On-Street Striped Lanes)
		Class III Bike Route (On-Street Signed Route)

0762-2016-01 (Ex-3-4)

SITE "C" MIXED USE HOTEL TRAFFIC IMPACT STUDY, Garden Grove, California

RK engineering
group, inc.

UNITE^{HERE}! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

November 1, 2017

Garden Grove Planning Commission
11222 Acacia Parkway
Garden Grove, CA 92840

**RE: Item C.1. Subsequent Mitigated Negative Declaration, Site Plan No. SP-043-2017,
Tentative Tract Map No. TT-17455, Development Agreement No. DA-008-2017**

Dear Planning Commissioners:

I write to you on behalf of UNITE HERE Local 11, a labor union that represents over 25,000 hospitality workers across Southern California. We urge you to deny the International West "Site C" project ("Modified Project") as it is currently proposed. Our local represents 136 members who live in the city of Garden Grove, and are deeply concerned about the impact this and similar projects will have on the quality of life in this community. Of particular concerns are the lack of comprehensive environmental review, the outdated land valuation and subsidy calculations, and the lack of community benefits commensurate with the projected amount of monetary and land subsidies.

Both the Modified Project and 2012 Project lack sufficient environmental review. A Mitigated Negative Declaration (MND) was prepared for both versions of the Site C project, rather than a more comprehensive Environmental Impact Report (EIR). The IS/MND from 2012 concluded a less-than-significant impact to the "existing visual character or quality of the site and its surroundings" based on the design guidelines for the International West Mixed Use Area in the 2008 General Plan.¹ The City of Garden Grove has changed dramatically since 2008, including the addition of several new commercial developments along major thoroughfares, such as Great Wolf Lodge Resort. We believe this warrants further environmental review.

The land value and subsidy calculations are based on an outdated study. When the project was originally approved in 2013, Horwath HTL, LLC "Horwath" prepared an economic evaluation of the Project. Based on the project's plans at that time – a 360-room full-service hotel and two 150-room limited service hotels – Horwath concluded a negative residual land value for the land on which the hotels would be built of approximately \$31.5 million. The local hotel market and scope of the project have changed significantly since 2013, and this body should consider how these changes may have impacted the value of the land that the City is considering conveying upon the developer at little to no cost. The Modified Project includes two luxury, full-service hotels with 402 and 200 rooms, respectively, and one limited service hotel with 167 rooms. It also includes the introduction of retail uses on the site. The addition of a second full-service hotel makes this a very different development from what was approved in 2013. Having a full-service hotel will justify higher room rates and, ultimately, higher revenues

¹ Site C Subsequent Mitigated Negative Declaration and Study, September 2017, 17.

UNITEHERE! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

for the combined hotels. It is possible that with a higher end product in this project, the financing “gap” in the deal and the financial assistance needs of the current developer will be lower than those of the prior developer. If that is indeed the case, this body should have the developer compensate the City for the land. At minimum, these issues should be studied further before approving this modified deal.

The Horwath report also notes that estimates were based on a lack of projects in the planning stages at the time the report was prepared. “However, if additional rooms other than those mentioned in this report were to be added to the competitive supply, it could have a material impact on the market and the projected performance of the subject.” Since 2013, the City of Garden Grove has opened Great Wolf Lodge Resort, a 600-room hotel and indoor water park. At least 2 hotels are in the planning stages or close to filing for entitlements. Several new hotels have opened in Anaheim, and at least 4 are in the planning stages.

This project will be highly subsidized by the City without sufficient benefits to the community. The 2013 Grove District Resort Hotel Development Agreement (GDRHDA) projected an estimated Net Present Value of \$17.6 million for assistance to be provided to the developer over the next 20 years. While the GDRHDA recognizes the creation of jobs, it does not address the quality of these jobs nor does it consider whether most of those jobs will actually go to Garden Grove residents. This body should ensure that there are guarantees related to job quality and local hiring before approving modifications to this project. We encourage the Planning Commission to pay special attention to this matter.

Thank you for your time and consideration. We hope that you will consider our objections, and deny this project in its current form.

Sincerely,

Danielle Wilson
Research Analyst, UNITE HERE Local 11
(213)481-8530, Danielle.wilson@unitehere11.org

4. RESPONSES TO COMMENTS FROM DANIELLA WILSON, RESEARCH ANALYST, UNITE HERE LOCAL 11

Comment:

Both the Modified Project and 2012 Project lack sufficient environmental review. A Mitigated Negative Declaration (MND) was prepared for both versions of the Site C project, rather than a more comprehensive Environmental Impact Report (EIR). The IS/MND from 2012 concluded a less-than-significant impact to the “existing visual character or quality of the site and its surroundings” based on the design guidelines for the International West Mixed Use Area in the 2008 General Plan. The City of Garden Grove has changed dramatically since 2008, including the addition of several new commercial developments along major thoroughfares, such as Great Wolf Lodge Resort. We believe this warrants further environmental review.

Response:

The Site C project was originally approved in 2012. (the “2012 Project”). The City prepared an initial study and mitigated negative declaration that were also adopted in 2012 when the 2012 Project was approved (the 2012 IS/MND). A Notice of Determination for the 2012 Project was filed and posted accordingly on November 28, 2012.

Minor modifications to 2012 Project are now proposed (the “Modified Project”). Pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162, the City has prepared a subsequent initial study. Specifically, CEQA Guidelines section 15162 provides:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of

- the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

On this basis, the City's subsequent initial study analyzed whether the Modified Project meets any of the criteria listed in CEQA Guidelines Section 15162 requiring a subsequent EIR. As stated in the City's subsequent initial study, the Modified Project does not meet any of those criteria. The subsequent initial study concludes, based on numerous technical studies and facts in the record, that the Modified Project's environmental impacts can be mitigated to a level of less than significant. As a result, the City has prepared a Subsequent Mitigated Negative Declaration (the "Subsequent IS/MND").

The applicable designation in the project area is the International West Mixed Use designation which is intended to provide for a mix of uses, including resort, entertainment, retail, hotel, and some higher density residential that are appropriate for a major entertainment and tourism destination. As stated in the 2012 IS/MND and the Subsequent IS/MND, the existing surrounding land uses consist primarily of commercial and hotel uses. In addition, future development across Harbor Boulevard would complement the project as it would be developed under the overall vision for the International West Mixed Use Area. The Modified Project is therefore consistent with the surrounding uses and the mix of uses intended by the International West Mixed Use designation, including the new commercial developments along major thoroughfares, such as Great Wolf Lodge Resort, referenced in the comment. In addition, the Modified Project, as with the 2012 Project, would add to the visual interest of the streetscape and maintain a similar ambiance with the existing, surrounding area consistent with the applicable Community Design Element Guidelines for the International West Mixed Use Area. Therefore, impacts related to the existing visual character or quality of the site and its surroundings were determined to be less than significant in the Subsequent IS/MND.