

California Department of Transportation

DISTRICT 12
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August 4, 2025

Ms. Amanda Lauffer
Associate Planner
City of Anaheim
200 S. Anaheim Blvd.
Suite 162
Anaheim, CA. 92805

File: LDR/CEQA
SCH: 2024010859
12-ORA-2025-02855
SR-91; PM R14.055R

Dear Ms. Lauffer,

Thank you for including the California Department of Transportation (Caltrans) in the review of a Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the City of Anaheim's Festival Anaheim Hills Project. The project site's proposed development area falls within the newly created DA 5 for Mixed-Use purposes. DA 5 is estimated at 16.2 acres, resulting in DA 2 to be reduced from 48 acres to 31.8 acres in size. The development area is limited to DA 5, which includes the following APNs: 354-451-19 and -32. The exterior boundaries of the Specific Plan area would not change. The proposed development would demolish the existing approximately 62,676 square foot theater and, in its place, allow for the development of a 447-unit multi-family rental residential community. Of the existing theater's square footage, approximately 13,310 square feet of commercial use will be retained in DA 2 for future development. The existing retail within DA 5 includes the following uses that would remain as part of the proposed project: 6,475 square feet of restaurant, 9,200 square feet of office, 38,160 square feet of fitness/gym, 13,276 square feet of tutor/retail space, and 11,033 square feet of medical office building. Thus, the remaining commercial buildings would have a floor area ratio (FAR) of approximately 0.11, which is within the allowed FAR for DA 5's proposed Mixed-Use Medium land use designation, which allows a FAR up to 0.35. The proposed multi-family rental residential community would consist of a four-story multi-family residential building wrapped around a five-level parking structure with one subterranean level. Project amenities would include a clubhouse, swimming pools, courtyards, a fitness center, a leasing/mail area, and common open space. The proposed multi-family rental residential community would have four different unit types (i.e., studio, one-bedroom, two-bedroom, and three-bedroom) with private patio or balcony areas. All units would be single-story.

The Project site is located in the Anaheim Hills area of the City in Orange County (County). Regional access to the Project site is provided from State Route (SR) 91. From SR-91, access to the Project site is provided via Weir Canyon Road. Local access to the Project site is provided via Santa Ana Canyon Road and South Festival Drive. Multiple driveways provide access to the Anaheim Hills Festival Shopping Center along both Santa Ana Canyon Road and South Festival Drive. The Project site is approximately 0.15 miles east of Deer Canyon Park Preserve and 0.35 miles south of the Santa Ana River.

State Route 91 is owned and operated by Caltrans. Therefore, Caltrans is a commenting agency on this project, and has the following comments:

1. Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies. Additionally, Caltrans supports the City's progress in meeting its Regional Housing Needs Assessment (RHNA) allocation, and we encourage the City to promote the development of housing units for a variety of income levels.
2. Please encourage the use of transit among future residents, visitors, and workers of the proposed areas of developments. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled and improve air quality.
3. Caltrans encourages the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. This may include safety measures such as physically separated sidewalks and bike lanes, pedestrian-oriented LED lighting, high-visibility continental crosswalk striping, raised crosswalks, refuge islands, wayfinding signage, and safe connections to existing and proposed bicycle facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation.
4. Caltrans supports the project's inclusion of secure and functional short- and long-term bike parking. Short-term bike parking should be placed on the ground floor in visible areas that are close to main entrances and should be installed at least 24" away from walls and other objects (e.g. trash cans, plants, etc.). Both short- and long-term bike parking should be designed to accommodate different types of bikes (e.g. cargo bike, bike with trailer). For

additional guidance on providing functional bike parking, see the attached "Essentials of Bike Parking" guidance created by the Association of Pedestrian and Bicycle Professionals (link to online PDF: <https://www.apbp.org/Publications>).

5. During construction, please ensure that appropriate detours and safety measures are in place that prioritize the mobility, access, and safety of bicyclists, pedestrians, and transit users. If adjacent sidewalks or bike lanes need to be closed during construction, please ensure that closures and detours are clearly signed. For bike lane closures, we recommend the use of "May Use Full Lane" (MUTCD R4-11) signage rather than "Share the Road" (W16-1P) signage to more clearly indicate to both drivers and bicyclists that bicyclists may ride in the center of the travel lane while the bike lane is closed.
6. Please describe how freight vehicles currently serve the retail center and how any expansion or redesign might affect truck turning movements or goods delivery logistics.
7. Please include a commercial truck circulation plan with emphasis on safe turning templates (e.g., WB-50), off-street loading zones, and avoiding conflicts with high pedestrian or parking areas. Confirm that updated driveway designs will support multi-modal and freight compatibility.
8. Please use the Caltrans Freight-Focused Land Use Compatibility Matrix to evaluate whether the modified land use mix may conflict with regional freight operations, particularly as it introduces new residential-serving or sensitive uses within a commercial freight-served zone.
9. Please add a policy consistency section assessing alignment with freight policies in SCAG's Goods Movement Appendix and Caltrans' freight strategies, especially where retail centers interface with regional highway corridors.
10. If future impact analysis leads to findings of significance on State facilities, please coordinate with Caltrans District 12 Local Development on development of a Traffic Mitigation Agreement or similar effort.
11. Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. Prior to submitting to Caltrans Permit's branch, applicant should fill out Applicant's Checklist to Determine Applicable Review Process (QMAP List) Form TR-0416 to determine if project oversight/coordination with Caltrans

Project Manager is needed. If coordination is not required, please submit an encroachment permit application package (EPAP) through the Caltrans Encroachment Permit System (CEPS - <https://ceps.dot.ca.gov/>). EPAP should

include application, PE signed and stamped site-specific traffic control plan, insurance, letter of authorizations as needed, and any other relevant documents. EPAP should be submitted as early as possible to avoid any delays.

12. Project plans and traffic control plans must be stamped and signed by a licensed engineer. For all plans, including traffic control plans, Caltrans R/W lines should be clearly labeled, which includes existing and proposed (if there are any changes to Caltrans R/W), the north arrow, the edge of pavement, and edge of the sidewalk, if applicable. When submitting the application, please include final Environmental Clearance Documentation, relevant design details including design exception approvals and construction and drainage plans, traffic control plans, traffic management plan and traffic impact study if proposed traffic delay of 30 minutes above normal recurring traffic delay is anticipated, any Caltrans R/W certifications if needed, maintenance agreement as needed, shoring plans for any excavation 5-feet or more, ADA certification, and any letter of authorizations.

The following comments are specific to Appendix 4.17-2: Anaheim Hills Festival SPA NO. 6 Traffic Analysis (March 13, 2025):

13. Page 33, Table 4-1; Please show rates of the other uses for reference.
14. Traffic Movement/Volumes Exhibits – Please remove any movements that do not exist at the intersections (i.e., Intersection #13, 14, etc.). It is difficult to differentiate between zero volumes from a movement that does not exist.
15. Page 34, Table 4-3: If Opening Year traffic is projected from existing volume that includes the vacant Cinema, then no trip credits should be taken again. Please verify. It is a significant amount of trip credit taken during the PM and Daily.
16. Page 42, Section 4.7: Was there any vacancy of any existing project land uses during the Existing 2024 counts? No trip credits should be taken again. Please verify. It is a significant amount of trip credit taken during the PM and Daily.
17. Peak Hour Queuing Summaries: Please revise "I-215" to "SR-91" in footnote 3. Verify all tables.

The following comments are specific to Appendix 4.17-1: ANAHEIM HILLS FESTIVAL SPECIFIC PLAN AMENDMENT NO. 6 VEHICLE MILES TRAVELED (VMT) ANALYSIS (December 23, 2024)

18. If the Baseline data was taken from the OCTAM base year of 2016, then how were Base year and cumulative year results used to calculate the baseline condition using straight line linear interpolation? "Baseline" in Table 2 is 2016. What year are Baseline/Cumulative scenarios in the other tables? Clarification needed.
19. Page 7- Provide source, date published, of the cited "Handbook" for reference.
20. Page 7 – T-1 Increase Residential Density Section – States, you can apply T-1 to reduce trips if "a Project has higher density of dwelling units compared to the average residential density in the US". What is the average residential density in the US? Provide a quantified comparison with this project's density of dwelling.

Caltrans' mission is to improve lives and communities through transportation. 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 Julie Lugaro at Julie.lugaro@dot.ca.gov.

Sincerely,


Scott Shelley (Aug 4, 2025 14:38:33 PDT)

Scott Shelley
Branch Chief,
Local Development Review-Climate Change-Transit Grants
Caltrans, District 12