

Date: September 17, 2024
Prepared by: Meaghan Truman, Associate Environmental Planner III
To: Ali Pezeshkpour, apezeshkpour@santa-ana.org
Site: Related Bristol Specific Plan Project
Subject: **Late Comment Letters on the Supplemental EIR for the Related Bristol Specific Plan Project Received before September 17, 2024 (SCH No. 2020029087)**

Dear Mr. Pezeshkpour,

The 45-day public comment period for the Supplemental EIR of the Related Bristol Specific Plan Project began July 6, 2023, and ended on August 21, 2023, as documented on the City’s website, the Orange County Clerk’s website, and State Clearinghouse.

Under CEQA, a lead agency is required to consider comments on the Draft SEIR and to prepare written responses, if a comment is received within the public comment period. (Pub. Resources Code, § 21091, subd. (d); CEQA Guidelines, § 15088.) When a comment letter is received after the close of the public comment period, however, a lead agency does not have an obligation to respond. (Pub. Resources Code, § 21091, subd. (d)(1); Pub. Resources Code, § 21092.5, subd. (c)(“Nothing in this section requires the lead agency to respond to comments not received within the comment periods specified in this division, to reopen comment periods, or to delay acting on a negative declaration or environmental impact report.”).) Although a lead agency is not required to respond to late comments, it may choose to do so. (Gray v. County of Madera (2008) 167 Cal. App. 4th 1099, 1110 (Gray), citing Pub. Resources Code, § 21091, subd. (d)(1); CEQA Guidelines, § 15088; Gilroy Citizens for Responsible Planning v. City of Gilroy (2006) 140 Cal.App.4th 911, 925, fn. 10 (Gilroy Citizens)).

The letters were received by the City of Santa Ana after the 45-day public comment period for the Draft Supplemental EIR ended on August 21, 2023. However, the City of Santa Ana has elected to prepare the following written responses with the intent of conducting a comprehensive and meaningful evaluation of the proposed Project. The number designations in the responses are correlated to the bracketed and identified portions in the comment letter. EPD Solutions, Inc. has reviewed the letters and provided responses for the Lead Agency’s consideration in review of the Related Bristol Specific Plan Project at the September 17, 2024, City Council Hearing. As further detailed in the individual responses to comments below, none of the comments indicate that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation as described in CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented, there is no substantial increase in the severity of an environmental impact, no feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the environmental impacts of the Project, and the Draft and Final SEIR are not fundamentally inadequate and conclusory in nature.

Please find the letters and response to comments attached.

Respectfully,

Meaghan Truman

Letter CCI: Support Comment Letters (1 page) Late Comment letter

Letters of Support

On behalf of Related Bristol, we sincerely appreciate all of the stakeholders who have taken the time and effort to participate in our community outreach process. We have been greatly encouraged that the Project has been well-received and express sincere gratitude to our supporters who share our vision and aspirations for Related Bristol, Santa Ana, and Orange County.

Key Supporters Include:

Business Organizations & Companies

- Santa Ana Chamber of Commerce
- Travel Santa Ana
- Orange County Business Council
- Orange County Hispanic Chamber of Commerce
- Apartment Association of Orange County
- California Apartment Association
- Octane
- S&A Management

Nonprofit Organizations

- Hope Builders
- Goodwill of Orange County
- Girl Scouts of Orange County (Santa Ana Chapter)
- Frida Theater & DTSA ArtWalk
- Kidworks
- Orange County United Way
- Mater Dei High School
- Cristo Rey Orange County High School (Santa Ana)

Existing Metro Town Square Retail Tenants

- Albertson's/Von's
- Hans' Homemade Ice Cream
- The Boiling Crab
- Grounded Planet, Inc.
- Wang Cho BBQ
- South Coast Pediatric Dentistry

Neighborhood Associations, Community Groups, and Individuals

- G7 Neighborhood Leaders Alliance (represents leadership of 17 city neighborhood associations)
- Lee DeLeon, President and Founder of Templo Calvario church
- Sal Tinajero
- Jeffrey Katz (Floral Park)
- Irma Jauregui (Wilshire Square)
- Michael Hixson (Sandpointe)
- Timothy Rush (Wilshire Square)
- Pam and Larry Marshburn (South Coast Shores)
- Maurizio Bertoldi (South Coast Shores)
- Astrid and Michal Collins (Metro Classic)
- Katherine Freeman (Republic Homes)
- Elizabeth Hansburg, People for Housing
- Kevin Ting, Santa Ana resident
- Hundreds of other individuals

CCI.1

Flores, Dora

From: Ryan Chase [REDACTED]
Sent: Friday, September 13, 2024 4:03 PM
To: eComment
Subject: Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Mayor & Councilmembers,

My name is Ryan Chase, a principal at S & A Management, and a 4th-generation property owner in Santa Ana since 1919.

I know you are busy so will keep my comments simple.

Please approve the Related Bristol project. It will deliver enormous economic benefit and positive press to the city, with nearly \$3 billion in private investment, thousands of jobs, millions of annual tax revenue and 13 acres of open space that will be programmed for year-round activities to attract local residents and visitors alike.

Related is as reputable a developer as they come, and Related Bristol is a HUGE opportunity to develop a dynamic new destination with energy, importance and attraction in the south end of Santa Ana. A project of this size will transform South Bristol Street into a new gateway to our city, as well as send a positive message to the outside development and business community that Santa Ana is thinking BIG and open for business.

As a family deeply committed to this amazing city and desirous to see it continue to grow, we believe Related Bristol is a project that must go forward, the alternative would be a travesty and felt for generations to come, similarly to when the City rejected the proposal for South Coast Plaza many years ago. Please approve this visionary proposal which will deliver dividends to our city for generations to come.

Thank you,

Ryan Chase, Principal S & A Management

Flores, Dora

From: Brett Hollenbeck [REDACTED]
Sent: Saturday, September 14, 2024 10:06 AM
To: eComment
Subject: SUPPORT Item #22 Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 3,000 new housing units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely,
Brett Hollenbeck

Flores, Dora

From: Jordyn Kieft [REDACTED]
Sent: Saturday, September 14, 2024 10:30 AM
To: eComment
Subject: Related Bristol project support

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members,

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 1,000 new house units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely,

Jordyn Kieft

Flores, Dora

From: Patricia Heilig [REDACTED]
Sent: Saturday, September 14, 2024 10:34 AM
To: eComment
Subject: SUPPORT Item #22 Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 3,000 new housing units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely,

Patricia Heilig

Sent from my iPhone

Flores, Dora

From: Brent Stol [REDACTED]
Sent: Saturday, September 14, 2024 10:40 AM
To: eComment
Subject: SUPPORT Item #22 Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 3,000 new housing units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely,

Sent from my iPhone

- Brent

Flores, Dora

From: e waisanen [REDACTED]
Sent: Saturday, September 14, 2024 10:47 AM
To: eComment
Subject: Support for the Related Bristol Project

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members,

I'm writing to express my strong support for the Related Bristol Project, which will transform an aging shopping center into a vibrant neighborhood with over 1,000 new housing units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.
Sincerely, Elenora Waisanen

Flores, Dora

From: Robert Morse [REDACTED]
Sent: Saturday, September 14, 2024 11:32 AM
To: eComment
Subject: SUPPORT Item #22 Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 3,000 new housing units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely,

Robert "SantaBob" Morse
Commission to End Homelessness
Continuum of Care
Life on the Streets Ministry

Flores, Dora

From: Bade Apalt [REDACTED]
Sent: Saturday, September 14, 2024 8:03 PM
To: eComment
Subject: SUPPORT Item #22 Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 3,000 new housing units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely,

Flores, Dora

From: Justin Truong [REDACTED]
Sent: Saturday, September 14, 2024 11:36 PM
To: eComment
Subject: SUPPORT Item #22 Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 3,000 new housing units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely,
Justin Truong

Flores, Dora

From: Dale Helvig [REDACTED]
Sent: Sunday, September 15, 2024 3:50 PM
To: Amezcua, Valerie; Phan, Thai; Vazquez, Benjamin; Lopez, Jessie; Bacerra, Phil; Hernandez, Johnathan; Penalzoa, David; eComment
Cc: Carvalho, Sonia R.; Nunez, Alvaro; Thai, Minh; Hall, Jennifer
Subject: 2024-09-15 Letter to City Council-Support of Item 22 Related-Bristol
Attachments: 2024-09-15 Letter to City Council-Support of Item 22 Related-Bristol.pdf

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

See attached file.

Dale Helvig
Resident, Santa Ana

Dale Helvig
Resident, Santa Ana CA 92706

September 15, 2024

Mayor Amezcua and Santa Ana City Councilmembers
City of Santa Ana
20 Civic Center Plaza, 8th Floor
Santa Ana CA 92702

Subject: Support of Item 22 – Related Bristol Mixed Use Project

I will state the obvious.....this is once in a generation project. This is a project that is a win-win for the City of Santa Ana. The city needs revenue and wants housing, this project provides both while changing the landscape into a vibrant looking mixed-use complex that will support the city's needs for many, many years.

The Planning Department did a very thorough review, and the Planning Commission has provided you their approval. Do you part and approve this project.

Thank you for your time and consideration.



Respectfully,
Dale A Helvig
Resident, Santa Ana

cc: Alvaro Nuñez,
City Manager, Santa Ana

Sonia Carvalho,
City Attorney, Santa Ana

Minh Thai,
Executive Director, Planning

Flores, Dora

From: [REDACTED]
Sent: Sunday, September 15, 2024 5:42 PM
To: eComment
Subject: Related project on Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Members of the Santa Ana City Council,

I am writing to voice my support for the Related Bristol development project in Santa Ana, a venture that holds the potential to advance our collective goals of equity and shared prosperity.

At a time when housing is a fundamental right denied to many, the addition of up to 3,750 residential units is a crucial step toward ensuring that everyone in our community has a safe and affordable place to live. This project represents a move toward dismantling the barriers that prevent working people from accessing housing.

The development's inclusion of 350,000 square feet of commercial space, 250 hotel rooms, and 200 senior care units promises to create jobs and stimulate our local economy. This is an opportunity to prioritize the needs of the many over the profits of the few, fostering a more just and equitable society.

Furthermore, the 13 acres of open space will provide vital communal areas for recreation and solidarity, enhancing our community's well-being. The \$22 million community benefits package is a testament to the project's commitment to reinvesting in our public infrastructure and services.

I urge you to support this project, which aligns with our shared vision of a fairer, more inclusive Santa Ana.

In solidarity,

Santa Ana Resident

Flores, Dora

From: Carl Benninger [REDACTED]
Sent: Sunday, September 15, 2024 9:06 PM
To: eComment
Subject: Related project on Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

This project is good for the city and area. Vote yes for this project.

Flores, Dora

From: Devin Valdez [REDACTED] >
Sent: Monday, September 16, 2024 8:24 AM
To: eComment
Subject: Santa Ana - Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members,

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 1,000 new house units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely,

Devin Valdez

Flores, Dora

From: sharon ohara [REDACTED]
Sent: Monday, September 16, 2024 12:46 PM
To: eComment
Subject: SUPPORT Item #22 Related Bristol

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 3,000 new housing units. This development offers a fantastic opportunity to reuse a prime location in Santa Ana, right across from South Coast Plaza, bringing much-needed housing and revitalization to the area, and I urge the Council to vote yes on this project.

Sincerely, **Sharon OHara**

Flores, Dora

From: Elizabeth Hansburg P4H <elizabeth@peopleforhousing.org>
Sent: Monday, September 16, 2024 2:04 PM
To: eComment; !City Clerk
Subject: SUPPORT Item #22 Related Bristol
Attachments: Support Related Bristol P4HOC 9-16-2024.pdf

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Dear Santa Ana City Council Members,

I'm writing to express my strong support for the Related Bristol project, which will transform an aging shopping center into a vibrant neighborhood with over 3,000 new housing units. Please find attached our organization's letter of support. Thank you for your consideration.

Sincerely,

--

Elizabeth Hansburg
Co-Founder & Director





Fighting for a future of abundant housing in Orange County.
peopleforhousing.org

Honorable Valerie Amezcua
Mayor, City of Santa Ana
20 Civic Center Plaza
Santa Ana, CA 92701

September 16, 2024

Dear Mayor Amezcua and Members of the City Council,

I am writing in support of the project before you— Related Bristol— which seeks to add 3750 much-needed new housing units to Orange County, creating a new neighborhood and new destination on an otherwise crumbling, auto-oriented shopping center. Given the scarcity of empty, developable land in Orange County, this project is a rare and unique opportunity to provide new housing in a high quality, infill environment. We know that projects like Related Bristol are the future of sustainability—both economic and environmental—in today's increasingly urban Orange County.

After two years of extensive community outreach, public presentations, environmental reviews and millions of dollars spent on design working with the city, I hope this project is approved under its current design and unprecedented benefits package, which includes new community open space and funding for affordable housing. It would be a mistake to discard these efforts, and given the requirements of the Housing Accountability Act, whatever development would replace it would have much-needed housing, but would not generate the same level of synergy or sales tax from the mixed use and experiential retail contained in the current proposal.

The need for housing is real and pressing, and every unit we can add to the regional housing supply will help address the shortage that is felt by everyone. The quality of the design and planning with which Related Bristol will set a precedent for future infill development in Orange County. I urge you to vote yes and move this project forward.

Sincerely,

[Redacted signature]

Elizabeth Hansburg
Cofounder, Director

From: [Jane Davis](#)
To: [eComment](#)
Subject: Public Hearing 3600 Bristol
Date: Tuesday, September 17, 2024 1:51:45 PM

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Attn: City Council

I would like to express support for the project at 3600 Bristol.

From the information that I have read, I believe this project would be a significant improvement to this section of Santa Ana.

Jane Davis
Property owner

[REDACTED]
Santa Ana

Response to Letter CC1: Support Comment Letters, dated September 10, 2024 through September 17, 2024

This comment letter was received after the public review and comment period ended (July 6, 2023, through August 23, 2023). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment CC1.1: The first packet of letters of support was provided by the applicant team and includes attached letters of support from a mix of residents, local and civil organizations, nonprofits, business and regional stakeholders. Further comment letters in support of the Project were received from residents.

Response CC1.1: The comments express support for the Project and do not raise any specific environmental concerns with the analysis within the Draft Supplemental EIR or requirements of the proposed Specific Plan. The Draft Supplemental EIR was prepared pursuant to CEQA Statute and the CEQA Guidelines in order to provide a meaningful discussion of the proposed Project and its resulting potential environmental impacts as a means of public disclosure. Thus, no further response is required or provided; however, this comment will be forwarded to all decision makers as part of the Staff Report for the Project. The letters of support included in the commenter letter provided by the Applicant team have been included in this memo as Attachment A.

Letter CC2: Shelly (1 pages) Late Comment letter

From: [Shelly](#)
To: [eComment](#)
Subject: Notice of public Hearing requesting entitlements facilitate the new plan mixed urban village
Date: Monday, September 9, 2024 10:59:09 PM

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Hi
I am not going to be available to attend the meeting regarding this matter because I am working and paying my bills. I would like my voice to be heard by the City of Santa Ana which I pay taxes to.
I am against the city taking out all of our shopping places while being encouraged to walk to them. I don't understand why we need more units when there are a ton available for rent on Alton that nobody in this area can afford,
I am deeply against taking away our resources for shopping while we pay a higher tax than Newport Beach. 9.75 on our purchases when other cities pay 7.7
Has anyone in this city checked out how many of the rebuilds on Alton are occupied? And what those builders promised?
If they are all vacant, I really feel like this is a waste of money and a land grab. People don't want to have renters insurance in CA. But it's being forced on people.
If it were you buying a 1 bedroom condo for 400K in Santa Ana what would you expect out of the City where you decided to purchase it?
I urge you calm this 4000 plus units and respect the people in the area and their morning route.
If you look at the blocks around here with all the new built stuff, we still have homeless, and nobody can rent those units. I think putting more units that nobody can afford doesn't help, and creates more traffic.
I will share this email with my neighbors, the HOA, and the local news station.
Please explain why your new complexes are not filled and you need to take out our shopping areas to build more space? Something doesn't settle right.

CC2.1

Response to Letter CC2: Shelly, dated September 9, 2024

This comment letter was received after the public review and comment period ended (July 6, 2023, through August 23, 2023). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment CC2.1: This comment states that the Project would remove needed stores and replace them with more housing units in an area where additional units are not needed. The comment further states that the additional units would not assist in reducing the homeless population in the area and would result in an increase in traffic to the area. The comment concludes by stating that the already built new complexes are not filled and thus this additional development is unnecessary.

Response CC2.1: This comment does not provide substantial evidence of a significant environmental impact. The Project site has been designated as a District Center by the City of Santa Ana General Plan where intense mixed-use development is encouraged. As discussed in Section 5.8, *Land Use and Planning*, of the Draft Supplemental EIR, the proposed Project would be consistent with its General Plan designation. The proposed Project would provide housing proximate to local employment centers, commercial retail services and restaurants for onsite residents and employees working nearby. In addition, the proposed Project would provide onsite open space and recreation activities that would integrate into the existing communities around the site. Thus, the redevelopment of the site and change to the area has been planned for by the City.

In regard to the affordability of the units within the proposed Project site, the proposed Specific Plan does not include specific requirements for affordable units. However, the proposed Project would result in a residential density of 91 du/ac, which would allow the potential for each proposed residential or mixed-use development to include affordable residential units. Section 3.6 of the proposed Specific Plan describes that the City of Santa Ana has established an Affordable Housing Opportunity and Creation Ordinance (AHOCO) to encourage the development of housing that is affordable to a range of households with varying income levels. The Ordinance is applicable to new residential projects within the Specific Plan area that meet certain criteria. As implementing projects in the Specific Plan area are submitted to the City for review, they would be required to comply with the City's AHOCO or the Project's Development Agreement when approved. In addition, affordable housing is an economic and social issue. CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's potential economic and social effects are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft Supplemental EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of the Project's economic or social effects. Because no environmental impacts related to affordable housing would occur, mitigation measures are not required.

In regard to increases in traffic congestion, as detailed in Draft SEIR Section 5. 13 *Transportation*, Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the State CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Supplemental EIR focuses on analysis of Vehicle Miles Traveled (VMT) criteria and improvements to the circulation system along the Project's frontage to accommodate buildout of the proposed Project, pursuant to the City's recent General Plan Update. Further yet, the Supplemental EIR is not required to analyze impacts related to traffic congestion. Nevertheless, a Traffic Impact Analysis was prepared for the Project and is publicly available on the City's Project website.



IBEW ORANGE COUNTY

LOCAL UNION 441

309 N. Rampart St., Suite M, Orange, CA 92868
(714) 939-3131 www.ibewoc.com

Neal H. Lauzon
Business Manager

via email: eComment@santa-ana.org

September 16, 2024

City of Santa Ana City Council
20 Civic Center Plaza, M-30
Santa Ana, CA 92701

Re: 9/17/24 AGENDA ITEM 22, Action 4
Related Bristol Specific Plan – IN NEED OF A BUILDING TRADES PLA

Council:

At its September 17th meeting, Santa Ana City Council intends to present during public hearing various items concerning the *Related Bristol Specific Plan*, a proposed mixed-use development in the City of Santa Ana. Regarding Action 4 (Item 22), IBEW Local 441 stands *conditionally opposed* to the adoption of a development agreement *absent* a Project Labor Agreement with the LA/OC Building Trades.

PLAs offer security and benefits and should always be included on projects with the scope and magnitude of Related Bristol. Additionally, IBEW 441's own apprenticeship training center, OC ETI, is located in Santa Ana. Without a Project Labor Agreement, our apprentices, local resident journeymen, and veterans will not be given the opportunity to work in the city in which they live and train.

IBEW 441 hopes to endorse this mixed-use project in the future as the development agreement is reimagined with the inclusion of an LA/OC Building Trades PLA.

Sincerely,

A black rectangular redaction box covering the signature of Neal H. Lauzon.

Neal H. Lauzon
Business Manager

:dm/jc
OPEIU #537/AFL-CIO, CLC

CC3.1

Response to Letter CC3: Neal Lauzon dated September 16, 2024

This comment letter was received after the public review and comment period ended (July 6, 2023, through August 23, 2023). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment CC3.1: This comment states that IBEW Local 441 stands conditionally opposed to the adoption of a development agreement absent a project labor agreement with the Los Angeles/Orange County Building Trades. The comment states a project labor agreement offers benefits and should be included in projects of the magnitude of Related Bristol.

Response to Comment CC3.1: The comment does not raise any specific environmental concern with the analysis within the Draft Supplemental EIR or requirements of the proposed Specific Plan. CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's potential economic and social effects are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft Supplemental EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of the Project's economic or social effects. This comment will be forwarded to City decisionmakers as part of the Staff Report for the Project.

Flores, Dora

From: Louis Steers [REDACTED]
Sent: Monday, September 16, 2024 3:13 PM
To: eComment
Subject: Agenda Item #22

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

I strongly urge a non approval of various entitlements to facilitate the establishment of a new Specific Plan (SP) and construction of new, mixed use urban village for the following concerns:

1. Current congestion on Bristol and MacArthur and to my knowledge no plan to widen current streets. This project will cause more traffic issues for the residents residing in neighborhoods around the proposed urban village.
2. The proposed tenants of the urban village will take away the "affordable" shopping for current neighborhood residents and favor more upscale establishments and discriminate against the current population of the neighborhood. In addition it will cause an increase in vehicle traffic as residents commute to the stores in their price range.
3. The village's proposed 3750 residential units, 200 units of senior continuum of care living, 250 room key hotel and the 350,000 square feet of commercial space is astronomical increase of population on the proposed site which the 13.1 acres of publicly accessible open space does not remediate
4. Although Independent this urban village is parallel to the other "village" planned for Bear and Sunflower with increased housing and office space which will further increase traffic congestion on McArthur, Bristol , Bear and Sunflower.

CC4.1

I encourage all planning commission and council members to physically be present in the neighborhood and see what I am addressing. Backed up traffic getting on to freeways on Bear and commute traffic coming off the freeways on both Bear and Bristol.

I know that progress and upgraded shopping and housing cannot be stopped and is a positive plan on paper.... but please consider the reality of the impact this project will have on the real lives of the current residents as you cast your vote.

CC4.1
Cont.

Thank you for your attention to this matter

Sincerely
Louis Steers


Santa Ana, CA 92704

Response to Letter CC4: Louis Steers, dated September 16, 2024

This comment letter was received after the public review and comment period ended (July 6, 2023, through August 23, 2023). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment CC4.1: This comment states that the commenter opposes the proposed Project due to the increase in congestion around nearby roadways, the loss of affordable shopping options in the area, and the lack of open space provided for the large increase in population to the area.

Response CC4.1: The comment does not raise any specific environmental concern with the analysis within the Draft Supplemental EIR. Draft Supplemental EIR Section 5.13, *Transportation*, details that Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the State CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099[b][1]); and that “automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment” (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Supplemental EIR focuses on analysis of Vehicle Miles Traveled (VMT) criteria and improvements to the circulation system along the Project’s frontage to accommodate buildout of the proposed Project, pursuant to the City’s recent General Plan Update. Further yet, the Supplemental EIR is not required to analyze impacts related to traffic congestion. Nevertheless, a Traffic Impact Analysis was prepared for the Project and is publicly available on the City’s Project website. This comment will be forwarded to all decision makers as part of the staff report for the Project.

In regard to the affordability of the stores within the proposed Project site, CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project’s potential economic and social effects are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft Supplemental EIR includes an analysis of the Project’s potentially significant physical impacts on the environment and does not include substantial discussion of the Project’s economic or social effects. Because no environmental impacts related to the affordability of the stores would occur, mitigation measures are not required.

As discussed on page 5.12-8 of the Draft SEIR, while the proposed Project would provide approximately 17.21 acres of public and private open space, inclusive of 13.1 acres of publicly accessible open space and recreational facilities onsite, per the requirements of the Related Bristol Specific Plan, the proposed Project’s provision of parkland would not meet the City of Santa Ana’s GPU performance standard of 3 acres of parkland for every 1,000 residents, either on the site or cumulatively. As the existing ratio of acreage of parks and recreational facilities to existing City population results in a parkland deficiency of approximately 154.44 acres, development of the proposed Project would continue to result in a deficiency in parkland throughout the City of Santa Ana. The Project proposes to provide approximately 1.4 acres of publicly accessible open space per 1,000 residents, which exceeds the approximately 1.2 acres per 1,000 residents currently existing within the City.

In order to comply with the GPU policy of 3 acres of parkland per 1,000 residents, the proposed Project would require 27.7 acres of parkland or the dedication of approximately 67.3 percent of the Project site. While the proposed Project would provide approximately 17.21 acres of public and private open space onsite, inclusive of 13.1 acres of publicly accessible open space and facilities, and would comply with applicable Municipal Code requirements, the proposed Project would not provide 27.7 acres of parkland and recreation facilities onsite and would not meet the City of Santa Ana’s performance standard for

parkland, either on the site or cumulatively through the availability of parks and recreation facilities citywide. As discussed in the GPU FEIR, the City of Santa Ana is essentially fully built out and there is a lack of available vacant land to develop substantial new parks or expand existing facilities. Therefore, there would be no feasible mitigation measures that would be able to reduce the proposed Project's contribution to significant impacts related to the City's unsatisfactory level of resident to parkland ratio. As such, impacts would be significant and unavoidable, which is consistent with the findings of the GPU FEIR. This comment will be forwarded to all decision makers as part of the Staff Report for the Project.

Letter CC4: Bonnie Hanson (1 page) Late Comment Letter

Flores, Dora

From: Bonnie Hanson
Sent: Monday, September 16, 2024 3:47 PM
To: eComment
Subject: The meeting on 9/17/24 about proposed West side of 3600 Bristol St. area changes

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

To: The City of Santa Ana
Planning and Building Agency

Regarding: The Proposed Changes to the West Bristol Plaza Area (3600 Bristol St.)

Relating to: Application (AA #2303-03) and other appropriate items relating to the above

September 16, 2024

Regarding the proposed extreme and expansive changes to the large area on the West side of Bristol Street, between MacArthur and Susan Street, I am quite concerned—and many of my neighbors here are concerned with me. My late husband and I bought a home in this area (on So. Lowell St.) in 1977, and after moving here with our three sons, I have enjoyed living here in this middle-class area ever since. We appreciated the attitude of our friendly, multi-ethnic neighbors here-- more welcome than we found in our previous neighborhood in Tustin—where we experienced a lot of prejudice against less-wealthy residents. We were also persuaded to move here by the wide assortment of affordable stores, restaurants (including fast-food ones), and other helpful businesses such as banks and dental and eye care. We gladly became involved in our local community, including a local church. In 2017, after my dear husband died, I sold my home. But deciding where to move next was no brainer—ever since then. I’ve lived in the South Coast Villas apartment complex within a few minutes’ walking distance of Bristol St. Having given up my car (I’m now 92), I can still get around this area with my cart, shopping for groceries, prescriptions, fast food, and many other needs. Good exercise and independence. The many businesses on the West side of Bristol, as well as those on the East side, help meet my needs and those of many of my neighbors, from little ones to senior citizens like me. Like most of those in the area, I’m on a modest income, mostly Social Security. Many months ago, when I first heard of these proposed changes, and an open meeting was held at nearby Saddleback High School, to introduce the changes, I attended. I had a list of questions to ask about this proposal, as follows:

CC5.1

QUESTIONS:

- 1. What about businesses in this area now—like B of A, Vons, Chase, McDonalds? Will they all be invited to stay? If so, in new buildings? And what about their businesses from now till new buildings completed? How long is change expected to take?
2. What about added traffic congestion?
3. How will this impact South Coast Plaza?
4. What about the usual temporary Christmas Tree sales area?
5. What about increased parking needs with less space?
6. How will this huge increase in use affect local power and water supplies? Sewer lines?
7. What about increased traffic impact on the 405/Bristol, Bristol/Sunflower, Bristol/MacArthur intersections?

CC5.2

That night, I kept waiting for a chance to ask those questions, but never got it. They are still important questions to ask about this project. Is it a great step forward for the city of Santa Ana, for the residents in this area, for the businesses already in this area, for all of Orange County? Or just a chance for some property owners to grab a lot of dough, no matter how it affects others?

CC5.3

Thank you for this opportunity for my thoughts on this very important matter. Sincerely,

Response to Letter CC5: Bonnie Hanson, dated September 16, 2024

This comment letter was received after the public review and comment period ended (July 6, 2023, through August 23, 2023). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment CC5.1: This comment states the commenter is concerned about the Project and that the commenter has enjoyed living in Santa Ana. The comment states that the commenter lives in the area and shops at the Project site and that the businesses help the community.

Response CC5.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft Supplemental EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment CC5.2: The comment discusses that the commenter went to a meeting regarding the Project at Saddleback High School and had a list of questions. The comments asks what will happen to the businesses in the area now and whether they will be invited to stay and what will happen during construction. The comment asks how long construction will take. The comment asks about added traffic congestion and how the Project will impact South Coast Plaza. The comment asks about the temporary Christmas Tree sales area and the need for increased parking. The comment asks how the increase will affect local power, water supplies, and sewer lines. The comment asks about increased traffic on the 405/Bristol, Bristol/Sunflower, and Bristol/MacArthur intersections.

Response CC5.2: The comment does not raise a specific issue with the adequacy of the Draft Supplemental EIR or raise any other CEQA issue. Regarding the existing businesses and construction timing, as described in Chapter 6 of the Specific Plan, construction of Phase 1 is expected to commence in the first quarter of 2026 with completion in the first quarter of 2030. Existing land uses in the Phase 2 and Phase 3 areas would be operational while Phase 1 is under construction. Phase 2 is expected to commence in the second quarter of 2030 with completion in the fourth quarter of 2032. Phase 3 is expected to commence in the first quarter of 2033 with completion in the second quarter of 2036. However, as the Project is a Specific Plan, future businesses that would operate within the Project are unknown.

In regard to traffic congestion, the Draft Supplemental EIR Section 5.13 *Transportation*, details that Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the State CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099[b][1]); and that “automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment” (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Supplemental EIR is not required to analyze impacts related to traffic congestion. Nevertheless, a Traffic Impact Analysis was prepared for the Project and is publicly available on the City’s Project website.

Regarding parking, as discussed on page 5.16-7 of the Draft SEIR, the Project is located on an infill site within a TPA as defined under Public Resources Code Section 21099; therefore, the Project’s parking impacts are not considered significant effects on the environment.

Regarding the Project’s impact on South Coast Plaza, the Project would not result in any changes to the existing operations at South Coast Plaza. Regarding the electricity demands of the proposed Project, as detailed in Draft Supplemental EIR Section 5.3, *Energy*, Southern California Edison Company (SCE) has the capacity to continue providing service to the Project site at buildout of the Project. Also, as described on page 5.3-11 of the Draft Supplemental EIR, the proposed Project would be required to comply with most current Title 24 Building Energy Efficiency Standards and Section 110.10 of the 2022 California Energy Code for solar panels. Further, Mitigation Measure GHG-2 requires the proposed Project to meet CALGreen Tier 2 voluntary energy efficiency standards, which surpass the building code energy efficiency

requirements, and would provide for high performance solar panels and installation of solar battery systems to provide storage of energy generated onsite.

In regard to water demands resulting from the Project, an analysis of potential water demand resulting from the Project was conducted as part of the Draft Supplemental EIR as a Water Supply Assessment (Appendix P to the Draft Supplemental EIR). As discussed on page 5.15-11 of the Draft Supplemental EIR, the Water Supply Assessment determined that the proposed Project would result in an increase of 802,359 gallons per day or 899 acre-feet per year. This volume of water supply was accounted for in the City's 2015 UWMP (as determined by the GPU FEIR). Additionally, as detailed in Table 5.15-5 of the Draft Supplemental EIR, the City has an additional supply of 5,500 to 6,500 AFY beyond that anticipated to be needed by the 2020 UWMP projections. Therefore, the City would have sufficient water supplies available to serve the Project and projected growth.

Regarding sewer demands resulting from the Project, Section 5.15, Utilities and Service Systems, details on page 5.15-5 that a Sewer Analysis Report (Draft Supplemental EIR Appendix Q) was prepared to determine whether the sewer system would be able to adequately handle the wastewater flows from the proposed Project in addition to existing flows. The analysis determined that the existing commercial development on the Project site generates an average flow of 0.0534 cubic feet per second (cfs) with a peak flow of 0.160 cfs. The proposed Project would generate an average flow of 1.177 cfs with a peak flow of 3.530 cfs. Thus, the proposed Project would result in an increase of flows by an average daily flow of 1.1236 cfs and a peak flow of 3.370 cfs. Based on results of the Sewer Analysis Report (Appendix Q), the proposed Project would install a new onsite sewer system that would connect to the existing 78-inch OCSD sewer main within the Sunflower Avenue right-of-way. The Sewer Analysis Report determined that the Sunflower Avenue OCSD sewer main has a maximum capacity of 96.8 cfs and has adequate capacity to accommodate the additional wastewater flows from the proposed Project. Also, each specific infrastructure improvement would be further verified through the City's development review and permitting process to ensure appropriate design capacities.

Comment CC5.3: This comment states that the commenter never got a chance to ask the previous questions at the meeting at Saddleback High School. The comment asks if the Project is a great step forward or if it is just a chance for property owners to make money.

Response CC5.3: The comment does not raise a specific issue with the adequacy of the Draft Supplemental EIR or raise any other CEQA issue. Therefore, no further response is required or provided. This comment will be forwarded to City decisionmakers as part of the Staff Report for the Project.

Letter CC6: Thomas Drennan (1 page) Late Comment Letter

I represent 20,000 Members of the International Union of Operating Engineers Local 12. IUOE Local 12 is also a Trade Union part of the OC/La Building Trades. I am respectfully requesting that the City Council postpone the agreement with Bristol Related, and allow more time for an agreement to be reached. The day of hand shake deals and giving my word as being golden are over. Without an agreement local hire, Helmets to hats, and MC3 requirements will not be able to be met. Many Local trade Unions will not even be on the job site. 2 trade Unions will monopolize the work and will not pay area standards.

Some may say this is not our fight or not our problem. you may be right. When it is not our fight and not our problem and people call on the Building Trades or Local 12, We come running and do what we can. We never leave our friends standing alone.

Take a look at OC V!be. a 6 Billion dollar private money project (very similar) just like this one has an agreement, right down the road. why the different standard? Why allow such a different standard or different set of rules on this project? it makes no sense to let so many Trade Unions with Local Hire apprentices, veterans, and Journey persons miss out on this opportunity to work on such a great project in such a great project

Thank You
Thomas Drennan

CC6.1

Response to Letter CC6: Thomas Drennan, dated September 17, 2024

This comment letter was received after the public review and comment period ended (July 6, 2023, through August 23, 2023). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment CC6.1: This comment states that the commenter represents 20,000 members of the International Union of Operating Engineers Local 12, which is a trade union part of the OC/LA Building Trades and that the commenter requests that the City Council postpone the agreement with Bristol Related to allow more time for a labor agreement to be reached. The comment states that without a local hire agreement, many local trade unions will not be on the job site. The comment says to look at OC V!be, which has a labor agreement and that it doesn't make sense to have so many local hire individuals miss out on working on such a great project.

Response CC6.1: The comment does not raise any specific environmental concern with the analysis within the Draft Supplemental EIR or requirements of the proposed Specific Plan. CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's potential economic and social effects are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft Supplemental EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of the Project's economic or social effects, such as labor agreements. This comment will be forwarded to City decisionmakers as part of the Staff Report for the Project.

COUNCIL MEETING
RELATED DEVELOPMENT SOUTH BRISTOL

17 SEP 2024

13 ACRES

In various meetings, we've heard folks positively gush about the great 13 acre "park" in this development. Realistically, this is open space only for the residents. No one from outside the development will be going there specifically to enjoy the park, walk the dog, or have fun with the kids. (maybe with an ice cream from Hans') there is nothing in the renderings that resembles a play area or sports facility, much less public restrooms.

If there is no playing field, it can't possibly take any pressure off of any of the parks that currently host multiple soccer games, basketball, etc. on every weekend. (more residents will exacerbate the situation) If there is a provision for that, it will be difficult for people to use it.

Where are "outside" visitors going to park? They're not going to use valet. Currently in many Santa Ana parks, the leagues bring their own goals, corner flags, etc. That won't be an option. How will they gain access to the area to unload / load equipment?

It won't be a convenient walk. How are they going to get their picnic baskets (?), beer and soda coolers, and chairs / umbrellas to the site? That issue currently exists; several parks are under-utilized (for sports) because of access issues. (e.g. Lili King... really can't park unless we pay off / twist the arms of SAUSD. Sandpointe... constant street parking already filled.

There are folks that think the addition of 13 acres to the City resume is a great thing; and any increase helps. But the over-all value to everyone outside of the property is marginal. There will be resistance to any organized sports if it upsets in any way the atmosphere of expensive luxury apartments. Referees' whistles, boisterous players, cheering, fans and their kids are not part of this development; not to mention evening practices and pick-up games. If you visit a "league play" day in a Santa Ana park, you know that activity would not work in this development.

If this is truly a windfall for the city, it should have provisions for weekend organized sports for the community. It should be ironclad in the Development Agreement. We know from sad experience that terms of Development Agreements are not always met (see Nexus NS2691). Any less-active amenities, tennis or pickle ball, for example, will undoubtedly be restricted by "reservations," card or code access, lack of restroom access, and parking issues. And consider that tennis / pickleball in Sandpointe isn't exactly booked solid.

The open space is private. Santa Ana Parks has not been a part of the discussion. There are no guarantees; and this isn't the windfall that some proclaim it to be. It is illusional.

EIR / Quality of Life

The area surrounding this proposed development will be subject to high disruptions in the quality of life; up to 15-20 years of construction issues, culminating in a 260% increase in "unmitigable" traffic by phase II. They propose to use commercial ride sharing, which only INCREASES the number of trips v. a personal vehicle.

Macarthur is already the de facto alternate for issues on the 405.

This is in an area that already has some of the busiest intersections in the County. Between Thanksgiving and Lunar New Year, the area is already frequently gridlocked.

CC7.1

CC7.2

There is a development under construction now at Macarthur and the 55 freeway.
THE VILLAGE (adjacent to this proposal, and across from South Coast Plaza) has already been presented.
Think what a project like this would do to the area where you live.
The Development Agreement must contain more mitigation for the area. Remember, the owners of this property also own property on the East side of Bristol. Perhaps parts of this could contain modified right turn / access -egress provisions to mitigate the issues.

CC7.2
Cont.

"PUBLIC BENEFIT FUNDS"

\$22,000,000 has been suggested for "Public Benefit". Considering the current costs of just about everything, this is absurdly inadequate. What does it cost to fully reconstruct 2 miles of Macarthur Blvd? (Hint: roadway reconstruction costs have been rising by 24% per year; UP 69% since December of 2020.)* The increase in construction traffic alone will accelerate the need for work on Macarthur and other arterials, already in jeopardy. This will need to be done before the RELATED project is fully contributory. Traffic on Flower, Sunflower, Macarthur, and Fairview will greatly increase, with a need for increased maintenance. The proposed funds will be exhausted just maintaining** what we have, and nothing will improve or be mitigated. The majority of the funds proposed need to be allocated to the area that will be most impacted by the development. There needs to be local citizen input, with full voting on how funds would be used.

CC7.3

The developer has touted the economic boon (sales tax, real estate taxes / valuation, increased economic activity) this will be for the City. That "largess" is in the future: 10-15 years. But the area will suffer and degrade in the interim. There will be an immediate decrease in funds from businesses, and increase in infrastructure deterioration. The investment of the Public Benefit funds in the immediate area is needed to off-set this impact, AND to ensure that the area is prepared and attractive to future residents, investors, and retail customers. If this does not happen, if the funds are parsed throughout the city on short-term pet projects and feel-good promotions, the development will not deliver the future projected gains. We must maintain the long view on the investment of the area. Remember the pain, economic impact, and ongoing traffic issues of the trolley? And how we were hamstrung by the County? The City needs to utilize the funds to offset the issues, anticipated and unanticipated, for the local area. This project impact will be an order of magnitude greater in volume and duration; in the area that is a large (largest?) contributor to the City budget. The project will undoubtedly impact that budget when we can least afford it, the next 2-6 years.

More Public Benefit from the developer, spent in the area around the development, with active input from the residents and businesses most impacted.

*<https://enotrans.org/article/fhwa-highway-construction-costs-continued-to-grow-at-24-annual-rate/>

**<https://www.santa-ana.org/documents/draft-2022-pavement-plan>

"the arterial network will change from "Good" to "Fair" condition from FY 2022/23 to FY 2028/29 ...level of funding is insufficient to stabilize the backlog since the unfunded deferred M&R projects will increase by 43 percent for the arterial network and increase by 35 percent for the local network.

CC7.4

Response to Letter CC7: Pete, dated September 17, 2024

This comment letter was received after the public review and comment period ended (July 6, 2023, through August 23, 2023). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment CC7.1: This comment states that the 13 acres of public open space proposed by the Project would not be useful for those residing outside of the proposed development as there are no opportunities to host organized sports. The comment further states that the Development Agreement should include provisions for weekend organized sports in the community, and that much of the open space will actually be private for the residences within the Project site and would be unavailable to other residences in the area.

Response CC7.1: The comment does not raise any specific environmental concern with the analysis within the Draft Supplemental EIR or requirements of the proposed Specific Plan. As discussed on page 5.12-8 of the Draft SEIR, the proposed Project would provide approximately 17.21 acres of total open space, with 13.1 acres being available to the public. While there are designated private open space areas proposed for the Project site, those areas are not included in the 13.1 acres of public open space that would be available to anyone in the community to access. As discussed on page 5.12-5 of the Draft EIR, the 13.1 acres of public open space will include a central park, two plaza spaces, a green link/paseo, and other open spaces such as landscaped parkways and programmable roads that could be used for public recreational areas. While the proposed open space areas may not be able to accommodate organized sport activities such as soccer or baseball, parks and open space come in a variety of forms, and the open space provided by the proposed Project would be consistent with Policy OS-1.5 of the Santa Ana General Plan Open Space Element to “provide a mix of community, neighborhood, and special-use parks, along with greenway corridors, natural areas, and landscape areas, to meet community needs for greenspace, recreation space, social space, and trail connectivity.” This comment will be forwarded to City decisionmakers as a part of the Staff Report for the Project.

Comment CC7.2: This comment states that implementation of the proposed Project would result in major traffic congestion on the surrounding roadways especially when combined with “The Village” which is adjacent to the proposed Project. The comment recommends additional mitigation in order to alleviate traffic congestion.

Response CC7.2: The comment does not raise any specific environmental concern with the analysis within the Draft Supplemental EIR or requirements of the proposed Specific Plan. In regard to increases in traffic congestion, as detailed in Draft SEIR Section 5. 13 *Transportation*, Senate Bill (SB) 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the State CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099[b][1]); and that “automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment” (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Supplemental EIR focuses on analysis of Vehicle Miles Traveled (VMT) criteria and improvements to the circulation system along the Project’s frontage to accommodate buildout of the proposed Project, pursuant to the City’s recent General Plan Update. Further yet, the Supplemental EIR is not required to analyze impacts related to traffic congestion. Nevertheless, a Traffic Impact Analysis was prepared for the Project and is publicly available on the City’s Project website. This comment will be forwarded to City decisionmakers as a part of the Staff Report for the Project.

Comment CC7.3: This comment states that the proposed Public Benefit Agreement is not sufficient to meet the needs of the surrounding community who will be impacted the most by the construction of the proposed Project. The commenter further states that while there may be future economic benefits of the proposed

Project, the area will suffer and degrade during the Project's extensive construction. The commenter states that the public benefits must be invested into the surrounding area who will be impacted the most by the construction, and there should be community input on where the public benefits should be spent.

Response CC7.3: The comment does not raise any specific environmental concern with the analysis within the Draft Supplemental EIR or requirements of the proposed Specific Plan. CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's potential economic and social effects are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft Supplemental EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include discussion of allocation of Development Agreement funds. This comment will be forwarded to City decisionmakers as part of the Staff Report for the Project.

Comment CC7.4: This comment provides links to the Eno Center for Transportation website and the City of Santa Ana 2022 Pavement Management Program.

Response CC7.4: The comment does not raise any specific environmental concern with the analysis within the Draft Supplemental EIR or requirements of the proposed Specific Plan. The commenter does not provide additional data or specific measures for consideration or incorporation under this specific comment. Therefore, no further revisions to the Draft EIR are required. This comment will be forwarded to City decisionmakers as part of the Staff Report for the Project.



Local 582 Orange County, California
United Association of Journeymen and
Apprentices of the Plumbing and Pipe
Fitting Industry of the United States and Canada

Robert James
*Business Manager,
Financial Secretary, Treasurer*

Via email: eComment@santa-ana.org

September 17th, 2024

City of Santa Ana City Council
20 Civic Center Plaza, M-30
Santa Ana Ca 92701

**RE: 9/17/24 AGENDA ITEM 22, ACTION 4
Related Bristol Specific Plan- IN NEED OF BUILDING TRADES PLA**

Council:

Today at the September 17th city council meeting, the city of Santa Ana City Council will be holding a public hearing on items of the Related Bristol Project Specific Plan, which is a proposed mixed use development in the City of Santa Ana. With regards of Action 4 (Item22), UA Local 582 stands **opposed** to the acceptance of this development as a Project Labor Agreement (PLA) with the LA/OC Building Trades is **absent**.

Project Labor Agreements hold benefits for our members that live in the city of Santa Ana, such as local hire standards and Veterans first which help our members work closer to home and that helps our members spend more time at home with their families. Local 582 has hundreds of its members that reside in the city of Santa Ana and work in other counties spending hours a day in their cars commuting.

UA Local 582 hopes and wants to endorse this mixed-use project if a PLA with the LA/OC Building Trades will be included moving forward with this project.

Thank you.

[Redacted signature]

Sincerely,
Henry Hillebrecht
Business Agent
Local Union 582
Plumbers and Steamfitters and Welders
Orange County

CC8.1

Response to Letter CC8: Local Union 582, dated September 17, 2024

This comment letter was received after the public review and comment period ended (July 6, 2023, through August 23, 2023). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment CC8.1: This comment summarizes the Project and states that it is going to City Council on September 17. The comment states that UA Local 582 is opposed to the acceptance of this development as a Project Labor Agreement (PLA) with the LA/OC Building Trades absent. The comment states that Project Labor Agreements have benefits for members living in Santa Ana and would help them work closer to home. The comment states that UA Local 582 wants to support the Project if a PLA with the LA/OC Buildings Trades is included.

Response CC8.1: The comment does not raise any specific environmental concern with the analysis within the Draft Supplemental EIR or requirements of the proposed Specific Plan. CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The Project's potential economic and social effects are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft Supplemental EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of the Project's economic or social effects, such as labor agreements. This comment will be forwarded to City decisionmakers as part of the Staff Report for the Project.