

Orozco, Norma

From: Patricia Flores <patricia@ocej.org>
Sent: Tuesday, February 15, 2022 3:56 PM
To: eComment
Subject: Re: Item 26, Santa Ana General Plan Update and Environmental Impact Report

Dear Santa Ana City Council:

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. **We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.**

OCEJ's concerns regarding the soil-lead policies, in particular, are as follows:

1. There are no provisions for the city to engage in soil-lead testing in residential neighborhoods, and no clear process or agreed upon safety thresholds for identifying lead-contaminated properties;
2. While Implementation Action 2.4 of the Safety Element expresses a commitment to working with our organization to understand the prevalence of environmental lead contamination in Santa Ana and to proposing solutions and measurements of effectiveness, there is not an actual expressed commitment to remediating the lead. What's more, the timeline limits the action to 2022--with a problem as widespread as soil-lead contamination, one year is not enough time to effectively address the crisis; and
3. There is no commitment to collaborating with the Orange County Health Care Agency to provide healthcare services for undocumented and uninsured residents living in neighborhoods impacted by soil-lead contamination.

Furthermore, we demand that the city establish a permanent Environmental Justice office with a public health expert on staff, to conduct regular meetings with residents and community organizations to guide implementation of these policies, give regular reports on local environmental health issues, and ensure a relationship of accountability and transparency between the city and the community.

Additionally, the Environmental Impact Report should not be passed as is, because it does not account for the fact that removing lead-based paint, as one of the General Plan provisions requires, actually shakes lead loose into the air and substantially increases soil-lead contamination in the area. Therefore, mitigation action on the city's part will be necessary to counteract this environmental impact. Furthermore, by the Planning Department's own admission, the EIR's data is set to expire in February 2022. **An updated EIR with fresh data, community input on which neighborhoods are designated as EJ Communities, and consideration for the impacts of lead paint removal**

activities is necessary before the city can ethically move forward with the General Plan Update.

If City Council decides to vote on the General Plan Update and Environmental Impact Report at the next council meeting, please vote not to approve the Environmental Justice components of the plan without our recommended revisions, and do not approve the EIR without accounting for the stale data and increase in lead contamination that the Plan could cause. Failing to account for these issues will place the city in violation of California SB1000, a dangerous move when the eyes of the California Attorney General's office are fixed on Santa Ana. If necessary, feel free to approve the Housing Element of the plan--but please, do not ignore these urgent health crises facing our community.

Thank you for your time and consideration.

Sincerely,

--

Patricia J. Flores Yrarrázaval
She/her/hers, they/them/theirs
Project Director
Orange County Environmental Justice (OCEJ)
www.ocej.org
FB/IG: @ocenvironmentaljustice

Orozco, Norma

From: Tim Schütz <info@sg.actionnetwork.org>
Sent: Tuesday, February 15, 2022 3:58 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

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Under California SB1000, Santa Ana's latest General Plan Update must address the environmental justice needs of our residents—however, despite the input and recommendations of a variety of community members and stakeholders, the city has not sufficiently committed to resolving these issues and prioritizing the health of our community.

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Thank you for taking the time to listen to our voices, and for fulfilling your responsibilities as the council members we elected to represent the needs of our community.

Tim Schütz
tschuetz@uci.edu

Irvine, California 92617

Orozco, Norma

From: Greg Camphire <gcamphire@gmail.com>
Sent: Tuesday, February 15, 2022 11:43 AM
To: eComment
Subject: Santa Ana General Plan Update

Hello,

I am writing with the hopes that Santa Ana City Council members and the mayor are already aware of the pollution emergency that is dangerously affecting our city's land, air, and water. In particular, the massive amount of toxic lead in the soil surrounding our most vulnerable residents is a major crisis that needs to be addressed and remediated immediately. This emergency situation has been well-documented: from a 2017 investigative report in *Think Progress*, to a thorough 2022 follow-up co-published by *The Grist* and *Voice of OC*—not to mention the State Attorney General's concerns about SB1000 violations in a [2020 letter to the City Attorney](#)—and even a UN expert's related call to action to solve the life-threatening global pollution problem as covered in *Reuters* today.

Despite this overwhelming evidence—including the fact that only 4% of Santa Ana's open land is considered green space—I'm concerned that the General Plan in its current version does not go far enough to take immediate action in ensuring the continued health of Santa Ana residents. While not the full responsibility of the City of Santa Ana alone, the City Council must utilize the General Plan as a crucial method of bringing together multiple stakeholders and community members to develop a comprehensive policy to address environmental justice concerns, especially lead contamination. Based on past engagement with Santa Ana residents and best scientific practices, the plan should include education and outreach about the lead pollution problem, mitigation actions such as soil testing and blood lead testing, remediating contaminated soil, and identifying policy and regulatory changes needed to reduce exposure. Although these elements have been previously requested by local organizations such as Orange County Environmental Justice, it is my understanding that they are absent from the current proposed General Plan Update.

I strongly urge the City to revisit the current draft of the General Plan Update with an eye toward actionable, measurable pollution response efforts that are encoded in city policies. As we painfully ease away from the worst moments of the Covid-19 pandemic, we are entering the midst of even larger growing

emergency: global climate chaos. This is an all-hands-on-deck moment for our city, our planet, and our species. Let's make Santa Ana a leader in the positive response to this situation and a model for other cities to follow. Together, we can work towards a greener, more sustainable world with three simple things that everyone can agree upon: clean air, clean water, and clean land.

Thank you,

Greg Camphire

92701

Ward 2

Orozco, Norma

From: Sandra Silva <info@sg.actionnetwork.org>
Sent: Monday, February 14, 2022 1:53 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Thank you for taking the time to listen to our voices, and for fulfilling your responsibilities as the council members we elected to represent the needs of our community.

Sandra Silva
ss3502@georgetown.edu
927 S Standard Ave, Apt 9
Santa Ana, California 92701

Orozco, Norma

From: María Hernández <info@sg.actionnetwork.org>
Sent: Monday, February 14, 2022 12:16 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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María Hernández
flavia063071@gmail.com
1434 S Minnie ST
Santa Ana , California 92707

Orozco, Norma

From: Katie Cox <info@sg.actionnetwork.org>
Sent: Friday, February 11, 2022 7:42 AM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Katie Cox
katie.coxshrader@gmail.com
37 Park Ave.
Long Beach, California 90803

Orozco, Norma

From: Luis Ramirez <info@sg.actionnetwork.org>
Sent: Thursday, February 10, 2022 11:14 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Luis Ramirez
ramirez3084@gmail.com
1511 N Fairmont St
Santa Ana , California 92701

Orozco, Norma

From: Hortencia Ramirez <info@sg.actionnetwork.org>
Sent: Thursday, February 10, 2022 11:09 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Hortencia Ramirez
Hramirez439@gmail.com
Fairmont st
Santa ana, California 92701

Orozco, Norma

From: Teresa Campos <info@sg.actionnetwork.org>
Sent: Thursday, February 10, 2022 8:45 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

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Teresa Campos
tcampos@giveforasmile.org
1142 S.towner St
Santa Ana, California 92707

Orozco, Norma

From: Yohana Rojas De Jesus <info@sg.actionnetwork.org>
Sent: Thursday, February 10, 2022 8:26 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Yohana Rojas De Jesus
yohanarojasdj@hotmail.com
408 E Civic Center Dr., 301
Santa Ana, California 92701

Orozco, Norma

From: Yezenia Marrujo <info@sg.actionnetwork.org>
Sent: Thursday, February 10, 2022 8:25 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Under California SB1000, Santa Ana's latest General Plan Update must address the environmental justice needs of our residents—however, despite the input and recommendations of a variety of community members and stakeholders, the city has not sufficiently committed to resolving these issues and prioritizing the health of our community.

We demand that the city establish a permanent Environmental Justice office with a public health expert on staff, to conduct regular meetings with residents and community organizations to guide implementation of these policies, give regular reports on local environmental health issues, and ensure a relationship of accountability and transparency between the city and the community.

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Thank you for taking the time to listen to our voices, and for fulfilling your responsibilities as the council members we elected to represent the needs of our community.

Yezenia Marrujo
yezeniamarrujo87@gmail.com
1413 s. Minnie st. Apt.6
Santa Ana, California 92707

Orozco, Norma

From: Kim Fortun <info@sg.actionnetwork.org>
Sent: Thursday, February 10, 2022 7:37 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am a UCI researcher (social sciences) and have studied sources and patterns of environmental injustice in your City. I fully agree with Santa Ana community organizations who have urged you not to pass the General Plan Update in its current form. Much more specific plans to address environmental injustice are needed. I also agree that the City needs a dedicated office and staff to address environmental justice -- in order to serve the residents of Santa Ana, and to be in step with both California and federal laws that call for accelerated, trackable plans to address the complex of factors that contribute to environmental injustice.

Further, the Environmental Impact Report that is coupled to the General Plan is inadequate, both in scoping and timing. The Environmental Impact Report will expire very soon, and clearly needs both updated and more extensive data to serve its purpose.

I have been inspired by the work and progressive vision of community organizations in Santa Ana, and know that many UCI researchers are ready to work with them to realize their visions. Slowing down your General Plan Update is needed to allow this alliance to bear fruit.

Thank you for your service as elected officials,

Kim Fortun, PhD
School of Social Sciences, AirUCI, and
Center for Environmental Health Disparities
University of California Irvine

Kim Fortun
kfortun@uci.edu

92 Coltrane Court
Irvine, California 92617

Orozco, Norma

From: Leonel Flores <info@sg.actionnetwork.org>
Sent: Thursday, February 10, 2022 6:57 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Leonel Flores
leonel.flores40@yahoo.com
1431 S Orange Ave
Santa Ana, California 92707

Orozco, Norma

From: Tristan Cimo <info@sg.actionnetwork.org>
Sent: Friday, February 04, 2022 1:49 PM
To: eComment
Subject: eComment - Santa Ana General Plan Update and Environmental Impact Report, 2-15-2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Tristan Cimo
TrissStyx@gmail.com

Fountain Valley, California 92708

Orozco, Norma

From: Maricela Castro <info@sg.actionnetwork.org>
Sent: Thursday, February 03, 2022 5:59 PM
To: eComment
Subject: eComment - Santa Ana General Plan Update and Environmental Impact Report, 2-15-2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Maricela Castro
maricela7720@gmail.com
300E. Santa Ana Blvd. Apt. 302
Santa Ana, California 92701

Orozco, Norma

From: Maria Cortes <info@sg.actionnetwork.org>
Sent: Friday, February 11, 2022 9:41 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Maria Cortes
mayte74668@gmail.com
1425 S Orange Ave
Santa Ana ca , California 92707

Orozco, Norma

From: Alana LeBron <info@sg.actionnetwork.org>
Sent: Sunday, February 13, 2022 8:19 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Alana LeBron
alebron@uci.edu
60 Coltrane Court
Irvine, California 92617

Orozco, Norma

From: Jun Wu <info@sg.actionnetwork.org>
Sent: Sunday, February 13, 2022 8:19 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Jun Wu
junwu@uci.edu
100 Theory, Suite 100
Irvine, California 92617

Orozco, Norma

From: Jazmin Candelario <info@sg.actionnetwork.org>
Sent: Sunday, February 13, 2022 9:02 PM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

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Jazmin Candelario
candelario.jazmin@gmail.com
1157 W Chatwau Ave
Anaheim, California 92802

Orozco, Norma

From: Adriana Sierra <info@sg.actionnetwork.org>
Sent: Monday, February 14, 2022 9:19 AM
To: eComment
Subject: eComment - Item 26, Santa Ana General Plan Update and Environmental Impact Report

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Adriana Sierra
adri14sierra@gmail.com

Santa Ana, California 92707

Orozco, Norma

From: Alicia Estrada <info@sg.actionnetwork.org>
Sent: Thursday, February 03, 2022 4:28 PM
To: eComment
Subject: eComment - Santa Ana General Plan Update and Environmental Impact Report, 2-15-2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Thank you for taking the time to listen to our voices, and for fulfilling your responsibilities as the council members we elected to represent the needs of our community.

Alicia Estrada
atarifan3329@aol.com

Santa Ana, California 92707

Orozco, Norma

From: Linda Lehnkering <info@sg.actionnetwork.org>
Sent: Wednesday, January 26, 2022 5:11 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Linda Lehnkering
ellethree@gmail.com
206 S Melrose St
Anaheim, California 92805-4027

Orozco, Norma

From: woolley@chapman.edu <info@sg.actionnetwork.org>
Sent: Wednesday, January 19, 2022 10:59 AM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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woolley@chapman.edu
338 w kelly ave
Orange , California 92866

Orozco, Norma

From: Brenda Moron <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 10:24 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

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Brenda Moron
infinite8flux@gmail.com
2010 W Harvard St
Santa Ana, California 92704

Orozco, Norma

From: doris yang <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 8:54 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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doris yang
dorisyaang@gmail.com

Orange, California 92866

Orozco, Norma

From: taft.nathan@gmail.com <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 4:36 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Sincerely,

Nathan Taft, Ward 3

taft.nathan@gmail.com

1919 Sherry Ln

Santa Ana, California 92705

Orozco, Norma

From: cortes.hairo@gmail.com <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 4:41 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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cortes.hairo@gmail.com
600 W 3rd Street #A205
Santa Ana, California 92701

Orozco, Norma

From: Amber Campos <campos_amber@yahoo.com>
Sent: Tuesday, January 18, 2022 4:56 PM
To: eComment
Subject: Nova Academy Parent

Hello, my name is Amber Campos, I am a resident of Santa Ana and I am a parent of two students attending NOVA Academy Early College High School.

As a parent, my child's safety at school is of utmost importance. This includes knowing:

- The campus environment will remain intact
- That they are able to quickly exit the building in case of emergency and escape to a safe space free of construction equipment and debris
- That they are able to happily participate in school activities in and around campus, and enjoy their high school experience to the fullest.

Please remember the children at NOVA Academy Early College High School as you adopt the General Plan Update.

Thank you for your leadership on behalf of our children and our community.

Respectfully,
Amber Campos

Orozco, Norma

From: Isander Gutierrez <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 4:22 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Isander Gutierrez
beringers.decline@gmail.com

Santa Ana, California 92707

Orozco, Norma

From: Ivann Muniz <ivannm49@gmail.com>
Sent: Tuesday, January 18, 2022 4:17 PM
To: eComment
Cc: Leonel Flores
Subject: General Plan

Hello,

My name is Jhoel Muniz and I am a member of the CUAL committee. I am here asking you to delay the General Plan since it still lacks many policies that many of our residents in our community deem extremely important. Policies which we believe should be included in the General Plan include those of Environmental Justice. As it stands, those policies are not enough to protect the health of our community members that deserve to have clean air. The lives and overall wellbeing of the residents of Santa Ana will be put at risk if no Environmental Justice policies are implemented into the General Plan. I urge you to please delay the General Plan and take time to implement policies in favor of Environmental Justice. The community deserves to be heard and taken into account in such an important decision that will affect the future of the next generation and beyond.

Thank you.

Orozco, Norma

From: Orozco, Norma
Sent: Tuesday, January 18, 2022 5:41 PM
To: eComment
Subject: RE: Retrasen el Plan General

Translation

Good afternoon, my name is Angeles Diaz and I am part of the CUAL committee and I want to ask you to delay the General Plan since it still lacks many very important policies that the General Plan should have in terms of Environmental Justice and it is not enough to protect health. of our community that deserves to have clean air for the well-being of our families and community so please I ask you to delay the General Plan. Based on this I expect a favorable response to my request. Thank you very much for your attention.

From: Maria de los angeles Diaz <angelesdiaz.jis072@gmail.com>
Sent: Tuesday, January 18, 2022 4:17 PM
To: eComment <ecomment@santa-ana.org>
Subject: Retrasen el Plan General

Buenas tardes mi nombre es Angeles Diaz y soy parte del comite CUAL y quiero pedirles que se retrase el Plan General ya que aun le faltan muchas politicas muy importantes que deberia tener el Plan General en cuanto a Justicia Ambiental y no es suficiente para proteger la salud de nuestra comunidad que merece tener aire limpio para el bienestar de nuestras familias y comunidad asi que por favor les pido que retrasen el Plan General. En base a esto Espero una respuesta favorable a mi peticion, Muchas gracias por su atencion.

Orozco, Norma

From: Matthew Delgado <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 4:10 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

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Matthew Delgado
mattjdel91@gmail.com
1715 s towner st
Santa ana, California 92707

Orozco, Norma

From: Fabiola Santiago <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 3:46 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

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For decades now, Santa Ana residents have suffered from the combined impacts of soil-lead contamination, air pollution, and having less open space and parkland than the majority of cities in the United States. Many of the city's low-income neighborhoods are contaminated with lead at 25 to 50 times higher than the California EPA safety threshold; huge swaths of Santa Ana face pollution burden scores of 84 to 99 out of 100; and low-income neighborhoods of color have 73% less park land than the region's more affluent, predominantly white neighborhoods. These health crises and environmental injustices have persisted for generations in our community—and now, Santa Ana City Council has the opportunity to take action.

Under California SB1000, Santa Ana's latest General Plan Update must address the environmental justice needs of our residents—however, despite the input and recommendations of a variety of community members and stakeholders, the city has not sufficiently committed to resolving these issues and prioritizing the health of our community.

We demand that the city establish a permanent Environmental Justice office with a public health expert on staff, to conduct regular meetings with residents and community organizations to guide implementation of these policies, give regular reports on local environmental health issues, and ensure a relationship of accountability and transparency between the city and the community.

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Thank you for taking the time to listen to our voices, and for fulfilling your responsibilities as the council members we elected to represent the needs of our community.

Fabiola Santiago
fs4014310@gmail.com
1401 N ross st
Santa Ana , California 92706

Orozco, Norma

From: Dorian Romero <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 3:17 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Dorian Romero
dorian@saascoalition.org

Santa Ana , California 92706

Orozco, Norma

From: Patricia J Yrarrazaval <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 3:42 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Thank you for taking the time to listen to our voices, and for fulfilling your responsibilities as the council members we elected to represent the needs of our community.

Sincerely,

Patricia J. Flores Yrarrázaval
Executive Director
Orange County Environmental Justice
www.ocej.org

Patricia J Yrarrazaval
patricia@ocej.org

3102 S. Townsend St.
Santa Ana, California 92704

Orozco, Norma

From: Greg Camphire <gcamphire@gmail.com>
Sent: Tuesday, January 18, 2022 11:58 AM
To: eComment
Subject: Item 32: Adoption of the General Plan

Hello,

I am writing with concerns about Santa Ana's upcoming General Plan. While the plan was delayed nearly a year ago to accommodate further engagement with the communities most affected by environmental justice issues (as required by CA SB100), it seems that the plan has not been updated significantly during that time. Like many other Santa Ana residents, I'm concerned that the General Plan in its current form fails to sufficiently incorporate some essential elements that have been requested.

Local community groups including Orange County Environmental Justice, THRIVE Santa Ana, Madison Park Neighborhood Association, and Rise Up Willowick have actively been advocating for a number of important issues over the past year, and these must be directly addressed in the General Plan for it to meet the requirements of SB100.

These issues include:

- A thorough plan for remediation of the widespread lead pollution disaster in the soil of Santa Ana, which was recently documented in great detail by [Voice of OC](#);
- The creation of a community land trust from vacant city-owned land;
- The enforcement of buffer zones between homes/schools and polluting industrial sites such as the corridor along south Main St.;
- Specific plans to build parks and green space, ideally meeting a ratio of 3 acres per 1,000 residents, with amendments to the Municipal Code to reflect this.

Please take these comments into consideration and delay the General Plan until they can be incorporated. I look forward to helping make Santa Ana a cleaner, greener, and healthier place for all residents.

Thank you,

Greg Camphire
Ward 2
92701

Orozco, Norma

From: Flor Barajas Tena <info@sg.actionnetwork.org>
Sent: Tuesday, January 18, 2022 11:22 AM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Flor Barajas Tena
fbtena@gmail.com
2015 N VALENCIA ST
SANTA ANA, California 92706-2936

Orozco, Norma

From: Jocelyn Rubio <info@sg.actionnetwork.org>
Sent: Monday, January 17, 2022 1:38 PM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Jocelyn Rubio
jocelyn.rubio@ymail.com
1033 W Saint Gertrude Pl
Santa Ana , California 92707

Orozco, Norma

From: Jose Rea <info@sg.actionnetwork.org>
Sent: Monday, January 17, 2022 10:55 AM
To: eComment
Subject: eComment - Item 23 January 18 2022

eComments City Council Santa Ana,

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. We do not oppose passing the Housing Element, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the General Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.

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Thank you for taking the time to listen to our voices, and for fulfilling your responsibilities as the council members we elected to represent the needs of our community.

Jose Rea
josejrea@gmail.com
1201 S. Halladay St.
Santa Ana, California 92707

Orozco, Norma

From: Natalie A Sierra <nasierra01@gmail.com>
Sent: Tuesday, December 21, 2021 3:42 PM
To: eComment
Subject: Delay the General Plan Update

Hello,

My name is Natalie, I am a resident of the Madison Park neighborhood, and I'm here to demand that you delay the General Plan Update in accordance with California law and with the demands of the Santa Ana community.

During the limited, unsuccessful outreach the City has conducted, the City has not sufficiently accommodated the needs of EJ communities. There have been multiple issues conducting community outreach events online, including the lack of translation services, technological difficulties, and a lack of necessary telecommunication services within EJ communities.

While we appreciate the effort the city has made to address these issues in recent meetings, this does not change the fact that so many community members' voices have been excluded from the process. How can we move forward with the plan without including our voices?

Thank you for your time.

Orozco, Norma

From: Patricia Flores <patricia@ocej.org>
Sent: Tuesday, December 21, 2021 4:00 PM
To: eComment
Subject: Re: Item 41, Santa Ana General Plan Update and Environmental Impact Report

Dear Santa Ana City Council,

I am writing to urge you to not pass the Environmental Justice provisions of the General Plan Update, nor the Environmental Impact Report, without addressing the concerns of residents and organizations like Orange County Environmental Justice, Madison Park Neighborhood Association, THRIVE Santa Ana, and Rise Up Willowick regarding the updated Plan's ability to effectively remediate soil-lead contamination, air pollution, and the lack of open space in our city. **We do not oppose passing the Housing Element of the General Plan, since there is a strict timeline for that element, but we believe the individual environmental justice policies of the Plan must be revised, as they do not sufficiently address the rampant environmental health issues that are poisoning our communities every day.**

OCEJ's concerns regarding the soil-lead policies, in particular, are as follows:

1. There are no provisions for the city to engage in soil-lead testing in residential neighborhoods, and no clear process or agreed upon safety thresholds for identifying lead-contaminated properties;
2. While Implementation Action 2.4 of the Safety Element expresses a commitment to working with our organization to understand the prevalence of environmental lead contamination in Santa Ana and to proposing solutions and measurements of effectiveness, there is not an actual expressed commitment to remediating the lead. What's more, the timeline limits the action to 2022--with a problem as widespread as soil-lead contamination, one year is not enough time to effectively address the crisis; and
3. There is no commitment to collaborating with the Orange County Health Care Agency to provide healthcare services for undocumented and uninsured residents living in neighborhoods impacted by soil-lead contamination.

Additionally, the Environmental Impact Report should not be passed as is, because it does not account for the fact that removing lead-based paint, as one of the General Plan provisions requires, actually shakes lead loose into the air and substantially increases soil-lead contamination in the area. Therefore, mitigation action on the city's part will be necessary to counteract this environmental impact.

If City Council decides to vote on the General Plan Update and Environmental Impact Report today, please vote not to approve the Environmental Justice components of the plan without our recommended revisions, and do not approve the EIR without accounting for the increase in lead contamination that the Plan could cause. Failing to account for these issues will put the city in violation of California SB1000, a dangerous move when the eyes of the California Attorney General's office are fixed on Santa Ana. If necessary, feel free to approve the Housing Element of the plan--but please, do not ignore these urgent health crises facing our community.

Sincerely,

--

Patrici J. Flores Yrarrázaval
She/her/hers, they/them/theirs
Project Director
Orange County Environmental Justice (OCEJ)

www.ocej.org

FB/IG: @ocenvironmentaljustice

Orozco, Norma

From: Greg Camphire <gcamphire@gmail.com>
Sent: Tuesday, December 21, 2021 12:19 PM
To: eComment
Cc: Sarmiento, Vicente; thaivphan@gmail.com; Lopez, Jessie; Mendoza, Nelida; jryanhernandez@santa-ana.org; Penaloza, David; Bacerra, Phil
Subject: Santa Ana General Plan

Hello City Council members,

I'm writing with concerns about Santa Ana's General Plan and whether it seriously meets the requirements to comply with SB 1000, "The Planning for Healthy Communities Act." It doesn't seem like the current version of the General Plan is going far enough to address specific concerns of Santa Ana residents who, like myself, reside in areas with high levels of lead pollution in the soil and toxic particulates in the air.

You may have noticed the terrible air quality in Santa Ana over the past few months, with existing industrial pollution exacerbated by excessive fuel from cargo ships backed up in nearby ports, as well as wildfires and other climate change-related disasters. This issue has been covered recently and extensively by the OC Register, Voice of OC, and LA Times; but recent events are just the latest negative development in our region's air quality, which stems from unregulated businesses producing toxic chemicals, especially along the South Main corridor, with no effective buffer zones between schools and residential areas--including where I and many neighbors live.

The lead pollution in our soil has also been a longstanding issue that has been covered extensively in local media. Links to cancer, asthma, learning disabilities, and other ailments have been well-established, but merely recognizing this problem is not enough. The city needs to develop a comprehensive testing and remediation plan to maintain the health of residents, especially children and seniors.

Finally, our city's lack of open green space borders on criminal neglect. With only a stunningly low 4% of Santa Ana's land considered green space--including a private golf course and cemetery(!)--we are in desperate need of more trees, parks, gardens, and other healthy plant-based environments in a very polluted city. The current General Plan does not address this need, especially when considering that the plan calls for further housing and commercial developments to accommodate significant population increases.

This is an emergency! As we continue battling the long-term effects of the unending Covid pandemic, along with the larger climate crisis, it is essential that Santa Ana leads the way in supporting healthy futures for its residents. I am strongly urging you to revisit the General Plan to ensure that it is clearly and effectively meeting our environmental justice needs. Otherwise, we are doomed.

Thank you,
Greg C.
92701

December 7, 2021

Via Email

Santa Ana City Council
20 Civic Center Plaza
Santa Ana, CA 92701

Re: Item 37 - Final Recirculated Program Environmental Impact Report No. 2020-03 and General Plan Amendment No. 2020-06 for Santa Ana General Plan Update

Dear Mayor Sarmiento and Councilmembers Phan, Penaloza, Lopez, Bacerra, Hernandez, and Mendoza,

The Kennedy Commission (the Commission), a broad-based coalition of residents and community organizations, advocates for the production of homes affordable for families earning less than \$27,000 annually in Orange County. Formed in 2001, the Commission has successfully partnered and worked with Orange County jurisdictions to create effective housing and land-use policies that have led to the new construction of homes affordable to lower-income working families.

As the City Council considers adopting the draft General Plan Update (“the General Plan”) today, the Commission would like to make clear that it opposes the adoption of the Plan as it is proposed today. The Commission does not believe the policies and programs proposed in the General Plan will effectively address the needs of residents or the concerns they raised during the City’s community engagement events.

Before the Council approves the General Plan, we request the City address the three following concerns:

- 1) In the General Plan, the City identifies five Focus Areas in the City where it plans to intensify development: 17th St. & Grand Ave., 55 Fwy & Dyer Rd., South Bristol St., South Main St., and West Santa Ana Blvd.¹ The City needs to provide policies that ensure that there will be robust production of 100% affordable housing in these areas. Without such policies, it is likely that the increases in densities being applied to these areas through the General Plan Update will primarily lead to market-rate housing.
- 2) Many census tracts in the five Focus Areas face a disproportionate level of environmental pollution.² Intensifying development and increasing the population in these areas without addressing these environmental concerns is not acceptable. Therefore, the City should consider conducting a preliminary environmental assessment of the five Focus Areas to understand the level of environmental pollution residents of these areas are and will face and, thus, determine the suitability of these areas for increased residential use.

¹ Santa Ana General Plan Public Review Draft, p. 238, December 2021
https://www.santa-ana.org/sites/default/files/pb/general-plan/December%202021%20Draft/2021%20SA%20Genera%20Plan%20%20Combined%20Doc_compressed.pdf

² CalEnviroScreen 4.0 Indicator Maps, <https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/>.

- 3) The General Plan does not propose policies that will effectively address the City's deep parkland deficit. The City currently has a parkland deficit of 154.44 acres, which means that for every 1,000 residents there are only 1.54 acres of parkland.³ The deficit is projected to increase to 346.41 acres by the year 2045 based on the development and population increases the City anticipates the Plan's proposed policies will facilitate, or to 1.20 acres per every 1,000 residents.⁴ Parks provide important benefits including improving physical and mental health, improving air quality, and reducing heat levels. They are essential to creating healthy and thriving communities. To ensure that the intensification of development does not further exacerbate the City's parkland deficit, the City should consider adopting the No-Net-Loss of Open Space being proposed by community groups like the Rise Up Willowick Coalition. This policy would require that current open space in the City lost to the market-rate housing be replaced at a 1-to-1 ratio. This policy would preserve open space in the City that can be converted to publicly accessible parkland.
- 4) In addition to concerns over the General Plan not addressing the City's current and future parkland deficit and the need for affordable housing policies, there are other environmental justice (EJ) issues the City's General Plan does not adequately address. Community groups like Orange County Environmental Justice, Madison Park Neighborhood Association, Santa Ana Active Transportation, and Thrive Santa Ana have raised concerns over the fact that the General Plan policies will not solve issues over air quality, lead contamination of soil, mobility, and the need to prioritize community-led land use and development, like through community land trusts.

The City says that it has done an adequate amount of community outreach over the last year and, thus, it is ready to adopt the General Plan. While there were multiple EJ forums and an EJ survey where residents and community groups raised the concerns mentioned in this letter, the City's General Plan does not adequately address them. True community engagement means that the City not only provides ample opportunities for community input, but that the City also addresses the input residents provide.

The Commission requests that the Council not adopt the General Plan being proposed tonight and instead direct City staff to work with residents and community groups to develop policies that actually address community needs and concerns.

The Commission looks forward to partnering with the City of Santa Ana to create opportunities to increase affordable homes for lower income households in the City. If you have any questions, please feel free to contact me at (949) 250-0909 or cesarc@kennedycommission.org.

Sincerely,



Cesar Covarrubias
Executive Director

³ Final Recirculated Draft Program Environmental Impact Report, Table 5.15 4, October, 2021, p. 5.15-28, https://www.santa-ana.org/sites/default/files/pb/general-plan/NovPEIR2021/Volume%202/Ch_05-15_REC.pdf.

⁴ Ibid.

THRIVE Santa Ana General Plan Analysis -- Land Use Element

Page 2

No mention of historic Latinx or Black neighborhoods, nor immigrant and refugee communities, nor youth, nor protecting residents from displacement

Page 3

The “Community Considerations” represent powerful direction from residents, coming from community meetings. The proposed draft does not make concrete policy commitments to these “considerations”

Page 4

Goal is good; but Policies seem to favor attraction of new residents and amenities rather than investment into and protection of existing communities.

Page 5

Employment opportunities

Policy LU-2.1 r

“Provide a broad spectrum of land uses and development that offer employment opportunities for current and future Santa Ana residents.” Remove “current and future,”

Policy LU-2.2

Capture Local Spending

This policy goal is key; consider making this the first

Policy LU-2.5

Benefits of Mixed-Use

Mixed-use at lower affordability -- representative of Santa Ana population

95.5% of renter households in the \$20,000 - \$35,000 range are rent burdened (Santa Ana Housing Needs Assessment Report, May 19, 2021)

Policy LU-2.6

ENCOURAGE INVESTMENT

Promote rehabilitation of properties and encourage increased levels of capital investment to [support local economic growth and ownership].

POLICY LU-2.8

CITY IMAGE

Encourage land uses, development projects, and public art installations that promote the City’s image as a cultural [powerhouse, home to immigrant, refugee, Black, brown and indigenous communities. Commit City resources to the creation of public art by local youth and low income residents.]

Page 6

POLICY LU-3.1

COMMUNITY BENEFITS

Support [only] new development which provides [specific, material] community benefit[s] and [enhances existing] neighborhood character and identity.

Note: "A Net" suggests that community benefits may be taken away, as long as a favorable sum is obtained in the end. That language is not necessary.

POLICY LU-3.2

EMPOWER COMMUNITY

Facilitate [and require] community [involvement] and dialogue in policy decisions and outcomes affecting land use and development, with [additional] opportunities for [community] planning activities within environmental justice area boundaries.

POLICY LU-3.3

ENFORCEMENT OF STANDARDS

Maintain a robust and proactive code enforcement program that partners with community stakeholders and is responsive to community needs. [This includes code enforcement that does not criminalize poverty, nor expose tenants to retaliation from landlords for reporting violations].

POLICY LU-3.5

ADAPTIVE REUSE

Encourage the preservation and reuse of historical [, obsolete, and underutilized] buildings and sites through flexible land use policies.

POLICY LU-3.9

NOXIOUS, HAZARDOUS, DANGEROUS, AND POLLUTING USES

Improve the health of residents, students, and workers by [eliminating] the operation of noxious, hazardous, dangerous, and polluting uses that are in close proximity to sensitive receptors, with priority given to discontinuing such uses within environmental justice area boundaries. [Implement remediation in collaboration with community organizations] [consult with Environmental Justice organizations on this point]

Page 7

POLICY LU-3.10

COMMUNITY ATTRACTIONS

[Utilize Community Benefits Agreements to] support the development of regional land uses that allow for entertainment, sports and unique venues [for the] benefit [of] the local community.

Page 8

POLICY LU-4.4

NATURAL RESOURCE CAPTURE

Encourage the use of natural [and structural] processes to capture rainwater runoff, sustainable electric power, and passive climate control.

Page 12

More open space

The following parcels should be designated open space, per City Council direction on 8/17/2021

- 915, 921 N Flower St
842 N Garnsey St
Santa Ana 92703
APN#005-142-35, - 47, -58
- 925 N Flower, 852 N Garnsey, and 848 N Garnsey,
Santa Ana 92703
APN# 005-142-34, -49, -48

810 N English St -- Artesia Pilar Neighborhood has expressed interest in a pocket park at English and Civic Center Blvd.

What is the environmental impact of higher density developments?

Page 23

Remove ONE BROADWAY PLAZA DISTRICT CENTER (OBPCD) zoning designation

Page 47

West Santa Ana Blvd Objectives

ADD

>> Create access for existing residents to affordable development and transit opportunities

Page 70

1.2

Community benefits. Develop a standard of review for evaluation of a new development project's net community benefit by identifying types of community benefits desired in neighborhoods through public outreach. Assess capital costs and ongoing operations and maintenance costs; conduct a financial feasibility analysis to determine the impacts of community benefits on the feasibility of desired types of development. [Require new

developments to provide specific community benefits identified by local residents.] [Utilize community benefit agreements for new developments over 2,000 SF or 15 units.]

Support [only] new development which provides [specific, material] community benefit[s] and [enhances existing] neighborhood character and identity.

Page 71

2.8 / or 2.15

[Community Land Trust

Utilize public resources including Surplus Land to support the development of at least one community land trust, to provide opportunities for community ownership and permanent affordability.]

2.11

Language provided to City staff in September and October 2020

Anti - Displacement strategies

[Whereas many communities that are now or may be served by development in planning areas are low-income and minority households and small locally- and minority-owned businesses that are at a potentially higher risk of displacement due to a range of factors, the City shall:

Implement and support strategies that stop the displacement of existing businesses and individuals from properties impacted by development projects; and

Support community and mission-based development opportunities that reduce displacement risk for low-income communities and communities of color by utilizing creative development delivery strategies, including community ownership models such community land trusts, tenant opportunities to purchase, right of first refusal, and others to build local wealth and support existing populations.]

...

THRIVE Public Comments @ Planning Commission Meeting (Nov 8, 2021?)

Two key areas are still largely unaddressed:

The displacement of the longtime residents in Santa Ana's low income neighborhoods, particularly youth, immigrants, renters, and other key vulnerable neighbors that are at the heart and soul of Santa Ana's character as a City, and are an integral part of our identity and our economy.

Environmental justice, too, has received a great deal of attention in the draft general plan, yet clear solutions have not been established for the widespread ground contamination, concentrated in low income neighborhoods of color

Environmental justice also includes **the availability of healthy food, open space, healthy living spaces, housing, and many other quality of life resources, including adequate civic representation and economic opportunities**, which are largely lacking in our low income neighborhoods. The current draft of the general plan is lacking in concrete commitments in these areas:

Language around . . .

- Anti-displacement
- Tenant protections
- Community benefits

. . . is weak, and make no actual commitments on the part of the City other than more meetings, without actual commitments to assure future development benefits existing residents and neighborhoods

Completely missing

Community land trusts
Tenant opportunity to purchase
First right of return
Right of first refusal
Mitigation of ground contamination

The current draft goes so far as providing a **private zoning code for developer Mike Harrah's project One Broadway Plaza**, despite historic community opposition to this project

Page 23 of the land use element provides for a new zoning code, ONE BROADWAY PLAZA DISTRICT CENTER (OBPDC) , explicitly created for the benefit of a developer



December 7, 2021

City of Santa Ana
Mayor and City Council
20 Civic Center Plaza

Re: Draft General Plan -- Recommendations

Dear City of Santa Ana City Council and Staff,

THRIVE Santa Ana is a nonprofit community organization dedicated to promoting economic development that builds community wealth, multigenerational resident leadership, and ensures permanent and access to affordable, healthy neighborhoods. The City's General Plan (GP) will set goals and policies to guide development in Santa Ana for the following decade, and will impact residents for generations to come. We recognize the efforts of City staff in hosting community meetings, and the City's impacted timeline. Nevertheless there are important deficiencies in the proposed draft that might be easily addressed. As THRIVE has taken part in outreach efforts with City staff, we put forward the following recommendations for City Council's consideration.

Also attached for your reference are THRIVE's analysis on the GP's Land Use Element and notes from THRIVE's participation at the November 2021 Planning Commission Meeting regarding the General Plan:

Recommendations:

1. Do not approve the General Plan as currently drafted. Direct staff to meet with community groups and establish collaborative strategies in the General Plan, to address concerns around soil contamination, environmental justice, and displacement of residents caused by development projects. Assure better alignment between Community Considerations, policy goals, and Implementation actions.
2. Work with Orange County Environmental Justice, Madison Park Neighborhood Association, and other community members impacted by lead soil contamination and other environmental justice issues. Commit City resources to identify and eliminate harmful substances from affected areas in the City.
3. Include on page 71 of the Land Use Element, as Implementation Action 2.11, the following language to support community ownership and strategies against displacement. Model language was shared with the City in September-October 2020.

Anti - Displacement strategies

[Many communities that are now or may be served by development in planning or focus areas are low-income and minority households and small locally- and minority-owned businesses that are at a potentially higher risk of displacement due to a range of factors. The City shall: (1) implement and support strategies that stop the displacement of existing businesses and individuals from properties impacted by development projects; and (2) support community and mission-based development opportunities that reduce displacement risk for low-income communities and communities of color by utilizing creative development delivery strategies, including cooperative ownership, community land trusts, tenant opportunities to purchase, right of first refusal, and others to build local wealth and support existing populations.]

The following recommendations address key issues with the General Plan Update. These policy solutions are familiar to City staff, and would strengthen existing language.

4. Include on page 71 of the Land Use Element, as Implementation Action 2.8, the following language to support a Community Land Trust strategy in Santa Ana, which would allow for permanently affordable housing:

Community Land Trust

Utilize public resources including Surplus Land to support the development of at least one community land trust, to provide opportunities for community ownership and permanent affordability.

5. Include on page 70 of the Land Use Element, as Implementation Action 1.2, the following language to guarantee community benefits from new development. New language indicated in [brackets].

Community benefits

Develop a standard of review for evaluation of a new development project's net community benefit by identifying types of community benefits desired in neighborhoods through public outreach. Assess capital costs and ongoing operations and maintenance costs; conduct a financial feasibility analysis to determine the impacts of community benefits on the feasibility of desired types of development. [Require new developments to provide specific community benefits identified by local residents.] [Utilize community benefit agreements for new developments over 25,000 SF or 15 units.]

Many of these recommendations have been expressed by THRIVE previously to City staff and Commissioners, and by community members as far back as the General Plan Advisory Group. Although the General Plan makes reference to "Community Considerations," the GP's proposed policies are not effectively aligned with these vital policy recommendations. Despite the enumeration of community meetings and outreach strategies, the current draft of the GP will further gentrification and enhance inequality in our City. Please do not approve the GP as currently drafted; direct City staff to meet with THRIVE, community organizations, and residents to improve the document before bringing it back to Council for approval.

Thank you,

Board of Directors
THRIVE Santa Ana
(714)987-2009



Dept. of Health, Society, and Behavior
Dept. of Chicano/Latino Studies
653 E. Peltason Drive, AIRB 2026
Irvine, CA 92697

December 7, 2021

RE: General Plan Process and Content

Dear Santa Ana City Council Members,

I write in my role as a founding member of the ¡Plo-NO Santa Ana! Lead-Free Santa Ana! Community-Academic Partnership to understand and address resident-driven concerns about lead in the environment. In this role, we have developed a robust sampling and analysis process, and have thoughtfully engaged residents of Santa Ana to better understand their concerns. I write to ask that the Mayor and City Council vote to delay adoption of the General Plan Update and the EIR, to take the time to adopt specific commitments to remediating environmental injustices in Santa Ana, and to implement a community review and approval process for each component in the General Plan prior to approval by City Council.

We believe that the current soil-lead policies in particular are insufficient, because: 1) there are no provisions for the city to engage in soil-lead testing in residential neighborhoods, and no clear process or agreed upon safety thresholds for identifying lead-contaminated properties; 2) while Implementation Action 2.4 of the Safety Element expresses a commitment to working with our organization to understand the prevalence of environmental lead contamination in Santa Ana and to proposing solutions and measurements of effectiveness, there is not an actual expressed commitment to remediating the lead, and the timeline limits the action to 2022--with a problem as widespread as soil-lead contamination, one year is not enough time to effectively address the crisis; and 3) there is no commitment to collaborating with the Orange County Health Care Agency to provide health care for undocumented and uninsured residents living in neighborhoods impacted by soil-lead contamination.

In the long-term, we would like the city to create an Environmental Justice Enforcement Agency, with staff trained to document and investigate community concerns about potential environmental injustices, meet quarterly with community stakeholders (like OCEJ, MPNA, Thrive Santa Ana, Santa Ana Active Streets Coalition, and Rise Up Willowick) to determine best practices for addressing environmental injustices, and to provide residents with regular reports on their work and local environmental health issues they have identified.

Please feel free to contact me if you have any questions or need further clarification. My contact information is below.

Alana M.W. LeBrón, PhD, MS
University of California, Irvine,
Department of Health, Society, and Behavior

Email: alebron@uci.edu
Phone: (617) 733-7963
Fax: (949) 824-1019

& Department of Chicano/Latino Studies
653 E. Peltason Drive
Anteater Instructional & Research Building Suite 2026
Irvine, CA 92697

Sincerely,

A handwritten signature in cursive script that reads "Alana M.W. LeBrón".

Alana M.W. LeBrón, PhD, MS
Assistant Professor



Department of Environmental and Occupational Health
Program in Public Health

Anteater Instruction & Research Bldg, Rm 2034
Irvine, CA 92697-3957
(949) 824-0548
(949) 824-0529 FAX

December 7, 2021

Santa Ana City Council
20 Civic Center Plaza
Santa Ana, CA 92702

Re: Public Comment to Agenda Item #37 for December 7, 2021 Santa Ana City Council Meeting

Dear Santa Ana City Councilmembers:

Thank you for the opportunity to comment on the City of Santa Ana General Plan Update and the Final Recirculated Program Environmental Impact Report (FEIR). I am Professor of Environmental Health and Graduate Director of the Department of Environmental and Occupational Health, University of California, Irvine. My research focuses on population-based studies of environmental exposure assessment, environmental health, and environmental health disparity. I have been working with community partners in Santa Ana for the past few years on environmental injustice issues.

I am writing to request that the City of Santa Ana **1) delay approval of the General Plan Update and certification of its accompanying FEIR; 2) work with communities to develop more comprehensive understanding of their environmental health concerns; and 3) incorporate pending resident concerns and suggestions in the General Plan that will make the City of Santa Ana more accountable in addressing the environmental injustice issues.** Below are my top reasons for the requests.

- 1) The UCI Public Health researchers have been working with community organizations (i.e. Orange County Environmental Justice and Madison Park Neighborhood Association) on various environmental injustice issues, including soil lead contamination and air pollution problems at both outdoor environment and workplaces. The collaborative work revealed substantial concerns of elevated contaminant exposures being experienced by Santa Ana residents and workers. Exposure to multiple environmental hazards may lead to numerous adverse health outcomes including asthma, cardiovascular diseases, IQ loss, and cancer etc. However, the recent Santa Ana Community Survey was designed and administered inadequately, which forced residents to choose between environmental justice priorities and had only a 0.2% participation rate. Thus the results of the survey likely did not capture all of the environmental health issues concerning the residents.
- 2) The City Council has held a few round table discussions with the UCI and Orange County Environmental Justice on soil lead contamination in 2021. However, the proposed solutions were not incorporated in the General Plan Update. More specifically, we believe that the current soil-lead policies are insufficient for three reasons:
 - There are no provisions for the city to engage in soil-lead testing in residential neighborhoods, and no clear process or agreed upon safety thresholds for identifying lead-contaminated properties;

- There is very limited commitment for the city to conduct soil remediation and blood testing, which should be continuing commitment over many years until lead contamination is no longer a problem instead a short-term attempt with a narrow scope of work; and
 - There is no commitment for the city to collaborating with the Orange County Health Care Agency to provide health care for undocumented and uninsured residents living in neighborhoods impacted by soil-lead contamination.
- 3) The General Plan does not adequately address existing environmental problems that Santa Ana residents are experiencing now. Pediatric emergency room asthma visits in Orange County are the highest in Santa Ana. Residents in Madison Park Neighborhood in Santa Ana raised concerns about chemical emissions from over 40 facilities permitted by the South Coast Air Management District (SCAQMD) in an “industrial corridor” adjacent to the neighborhood. But such environmental health issues and community concerns are omitted. In addition, the General Plan Update mentions the collaboration with the SCAQMD and local stakeholders to outline objectives and strategies for monitoring air pollution. However, the timeline was only set for 2022 and there was lack of actionable goals (e.g. establish a long-term air monitoring station in the city, closely monitor emissions of existing industrial facilities, monitor indoor air in industrial sectors with potentially high pollution levels). I suggest that the Plan incorporates regular sampling for environmental agents (e.g. air, soil, water) within the city, which can provide a foundation to address the existing environmental health concerns raised by residents.

In summary, the General Plan Update does not adequately address environmental justice issues and the existing environmental health problems the Santa Ana residents are facing. I strongly urge the City to delay approval of the General Plan Update so that the residents can have more time to understand the information presented and voice their concerns and suggestions.

Sincerely,



Jun Wu, Ph.D.
Professor and Graduate Program Director, Environmental and Occupational Health
Program in Public Health, Susan and Henry Samueli College of Health Science
University of California, Irvine

UCI Community Resilience

December 7, 2021

Santa Ana City Council
c/o Daisy Gomez
Clerk of the Council
20 Civic Center Plaza
Santa Ana, CA 92702
ecomment@santa-ana.org

Re: Public Comment to Agenda Item #37 for December 7, 2021 Santa Ana City Council Meeting

Dear Mayor Sarmiento and Council Members:

I am writing to express concerns that the community outreach process for the Santa Ana General Plan Update has not sufficiently engaged with the perspectives and needs of impacted residents in Santa Ana. Furthermore, the policies the city is proposing to adopt into the General Plan do not adequately address the decades-long soil-lead crisis and its toll on the health of our most vulnerable communities.

UCI Community Resilience Projects, a unit within the UCI Office of Sustainability, has supported ¡Plo-NO! Santa Ana! (Lead-Free Santa Ana!), a community-academic partnership formed in 2017, to investigate and remediate soil lead in Santa Ana and to advocate for the health equity needs of Santa Ana's disadvantaged communities.

Through soil sample testing, we found that over 50% of residential samples had levels of lead that exceeded California EPA recommendations. What's more, we found that the neighborhoods most impacted by soil-lead contamination were also:

- Predominantly people of color
- Lower median household income
- Lower % of college educated residents
- Higher proportions of renters
- Higher fraction of residents without health insurance
- Higher proportion of residents with immigrant status background
- Limited English proficiency
- Predominantly Latinx/Hispanic residents

These frontline communities in Santa Ana face a disproportionate impact of lead in their everyday lives, and yet they have been left out of the decision-making process that decides how to address the issue. This is why it is critical that moving forward we ensure that stakeholders that can give voice to their community are included in the city's planning efforts.

The City Council has shown a willingness to engage in this process before. Last fall, the City Council paused the adoption of the General Plan Update and invited community stakeholders, including ¡Plo-NO! Santa Ana!, to a series of roundtable discussions to inform the development of a community survey for outreach and engagement. Additionally, the City Planning Department invited ¡Plo-NO! Santa Ana! to a series of meetings to present research and inform policies to address the soil-lead crisis.

1

UCI Community Resilience

However, both of these attempts came up short. Our partners in ¡Plo-NO! Santa Ana! reported that very few of the solutions proposed during the meetings were incorporated into the General Plan and concerns around the survey design were not addressed in the final version that was disseminated to Santa Ana residents. Ultimately, the survey suffered from poor results, receiving only 746 responses. This number does not constitute an accurate assessment of Santa Ana communities' environmental justice needs. Simply put: a survey that engages only 0.2% of residents is not good enough.

¡Plo-NO! Santa Ana!, along with many other residents and community stakeholders, believe that a more thorough community engagement process is needed to better inform the update to the City's General Plan.

In order to ensure that the final version of the General Plan genuinely reflects the perspectives and needs of Santa Ana residents and expert community stakeholders, it is imperative that the City participate in an additional series of roundtable discussions with impacted residents and community groups such as ¡Plo-NO! Santa Ana!, in order to confirm their approval of the current policy language and incorporate any pending resident concerns.

For these reasons, I ask you to vote to delay the adoption of the Final Recirculated Program Environmental Impact Report No. 2020-03 and General Plan Amendment No. 2020-06 for Santa Ana General Plan Update.

The City must take the time to engage with impacted communities to adopt specific commitments to remediating the soil-lead crisis and other environmental injustices in Santa Ana, and to implement a community review and approval process for each component in the General Plan prior to approval by the City Council.

As one of the six Guiding Principles of the City of Santa Ana's Five-Year Strategic Plan, equity must not be forgotten in the General Plan process.

Thank you for your time and consideration.

Sincerely,



Gregory Lopez
Project Manager
Community Resilience Projects
University of California, Irvine

cc: Abigail Reyes, Director Community Resilience Projects, University of California, Irvine

DIANE FURTADO FRADKIN
2402 OAKMONT AVE
SANTA ANA, CA 92706
dianefradkin@hotmail.com

December 2, 2021

Santa Ana City Council
City of Santa Ana
PO Box 1988
Santa Ana, CA 92702

RE: 2021 General Plan Update and Program EIR

Honorable Mayor and City Council:

At the meeting on December 7, 2021, I would recommend that you direct Planning Staff to make the following revisions to the General Plan Update/Land Use Element:

- Designate the properties (Medical Arts & Shopping Center) at the Northwest Corner of 17th Street and Grand Ave as a **Specific Plan area**; the Specific Plan would include a park component known as the "Grand Park" with surrounding retail/commercial uses (think of cafes, bike rentals, coffee shops, boutiques, weekly farmer's market, etc) along with Garden Style Apartments (2 story), Town Homes (2 and 3 stories), Urban Neighborhood Low (UN-20) 3 stories; Urban Neighborhood Medium (UN-30) 4 stories and along the frontage area closest to the intersection of 17th and Grand Ave, Urban Medium High (UN-40) 5 stories with retail/commercial on the ground floor and residential for the 4 stories above.
- Designate the corridor along Grand Ave north of 17th Street specifically a combination of Garden Style Apartments (2 story), Town Homes (2 and 3 stories), Urban Neighborhood Low (UN-20) 3 stories and Urban Neighborhood Medium (UN-30) 4 stories along with a retail/commercial component on the ground floor for 40% of the buildings. This provides for more variety of development than just the same Urban Neighborhood Medium (UN-30) 4 story development along this corridor.
- Any area that is adjacent to Single Family Residential should only be allowed to have 2 stories abutting SFR along with a 40 foot setback...this specific language should be included in all residential development zoning and land use definitions.
- Open Space and Park Space need to be a **priority** for this General Plan Update; I would recommend that the calculation be applied for all the General Plan Update Areas in order to provide the much needed City deficient Park Space

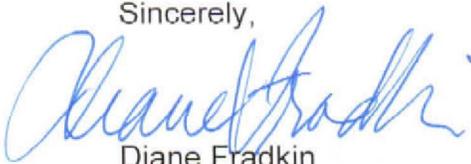
given that the uses are being updated so it makes sense to incorporate the Park Space as well. (See attached Exhibits for specifics).

- I have attached a few exhibits from a Power Point presentation made by Planning Staff....the map shows how deficient the park land is within the City limits... sometimes a picture is worth a thousand words...it states **“Recreation as Significant Environmental Impact”**. This absolutely needs to be rectified and actual Park land identified, dedicated and built out in this General Plan Update. Please direct Staff to include this specific language.
- The Park Land Ratio Exhibit downgrades the amount of park land from 1.03 acres per 1,000 people to .08 acres per 1,000.....how does this help?? **Please direct Staff to keep the amount of park space at 1.03 acres per 1,000.**
- The “Potential Policies & Actions” for the Open Space Element Exhibit is a good start. I would recommend that you direct Staff to incorporate this in the General Plan Update and make sure that these Policies are being followed and implemented across the board so that Park land is actually identified, dedicated and built out.
- Lastly, Roof Top Amenities on multi-family buildings are not open space for the public but an amenity for the residents who live in the buildings and should not be counted as open space/park space (as part of the City’s deficit of open space)...its an amenity to the tenants only, not the public. I would recommend that there is clarification in the General Plan Update about this in order to alleviate confusion and protect the actual need for Park land dedication.

I would be happy to further discuss my recommendations which I believe, will help shape the future of Santa Ana and in general, are good basic planning principles. I trust that you will guide Planning Staff to incorporate the above comments in order to fulfill the destiny of the General Plan Update.

Thank you for your service and attention to my suggestions.

Sincerely,



Diane Fradkin
29-year resident of Santa Ana
714-914-8047

Enclosures

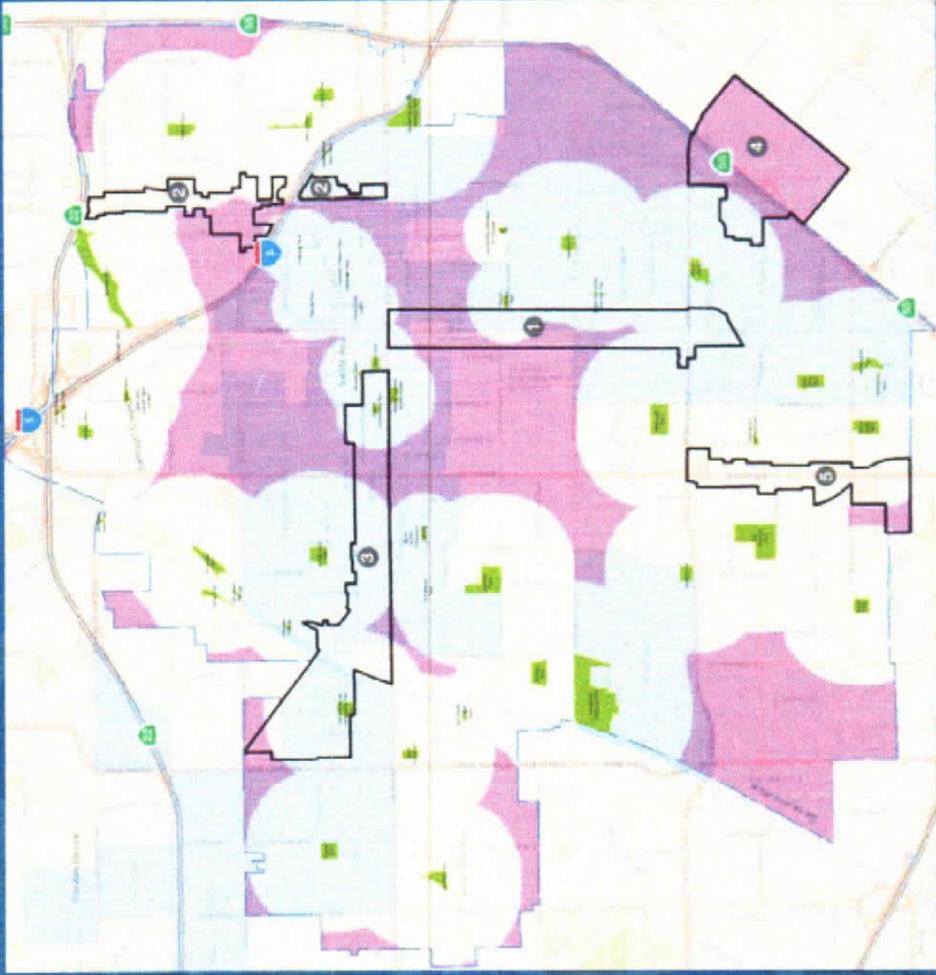
cc: Kristine Ridge
Minh Thai



Recirculated Program Environmental Impact Report

SANTA ANA GENERAL PLAN

Recreation as Significant Environmental Impact



Community Park – ½ mile Neighborhood Park – ¼ mile

- Park Deficient Areas
- Parks
- Proposed Parks
- Environmental Justice Communities

Focus Areas

- 1 South Main Street
- 2 Grand Ave/17th Street
- 3 West Santa Ana Boulevard
- 4 55 Freeway/Dyer Road
- 5 South Bristol Street



LAND USE PLAN

SANTA ANA GENERAL PLAN

Park Land Ratio

Existing:

334,774 population* and 343.8 parkland acres = **1.03 acres per 1,000**

Potential 2045 Buildout:

407,022 population and 343.8 parkland acres = **0.8 acres per 1,000**

Table 3-7 General Plan Update Existing and Buildout Population

| Planning Area | Existing Population | Buildout Population | Percentage Growth |
|------------------------------------|---------------------|---------------------|-------------------|
| FOCUS AREAS | 36,777 | 77,650 | 111 |
| 55 Freeway/Dyer Road | 9,034 | 31,050 | 244 |
| Grand Avenue/17th Street | 2,079 | 7,129 | 243 |
| South Bristol Street | 8,390 | 19,176 | 129 |
| South Main Street | 6,970 | 7,643 | 10 |
| West Santa Ana Boulevard | 10,304 | 12,652 | 23 |
| ALL OTHER AREAS OF THE CITY | 297,997 | 353,979 | 19 |
| CITYWIDE TOTAL¹ | 334,774 | 431,629 | 29 |

Source: Figures aggregated and projected by PlaceWorks, 2020. Methodology included in Appendix B-b, Santa Ana Buildout Methodology, of this Draft PEIR.

¹ Total population includes all individuals living in households, institutional group quarters, and noninstitutional group quarters.

* 2019 per RPEIR



OPEN SPACE ELEMENT

SANTA ANA GENERAL PLAN

Draft Policies

- **Park Master Plan.** Create and regularly update to guide the acquisition, development, maintenance and programming of parks, recreation facilities, trails and open space to meet community needs.(OS-1.1)
- **Park Standard.** Minimum 2 acres public parkland per 1,000 residents. (OS-1.3)
- **New Development.** ~ For new development within park deficient and environmental justice areas, prioritize the creation and dedication of new public parkland over the collection of impact fees. (OS-1.9)

Draft Implementation Actions

- **City Interagency Forum** (OS 1.2)
- **Annual Open Space Summit** (OS-1.3)
- **Park Opportunity Fund** (OS-1.5)
- **Parkland Requirement for Larger Residential Development** (OS-1.7)
- **Park Foundation** (OS-1.8)
- **Community Partnerships** (OS-1.14)

**POTENTIAL POLICIES
& ACTIONS**

Dale Helvig
Resident, Santa Ana CA 92706

December 7, 2021

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

Santa Ana's "Golden City Beyond: A Shared Vision" General Plan is a policy document that will guide the City's development and conservation for the next 25 years through 2045. KEEP THIS IS MIND

Subject: COMMENTS ON GENERAL PLAN UPDATE – LAND USE ELEMENT

LAND USE ELEMENT

The purpose of the Land Use Element is to provide a long-range guide for the physical development of the city, reflecting the community's vision for a high quality of life. [page LU-01].

ITEM 1

INTRODUCTION

If we can use 2020 data for determining number of employees (160,000) we should be able to use 2020 date for residents. Even the 2015 data is higher than what is reflected in the introduction. Population should be updated to the 2020 census data. Not knowing what changes to the Municipal Code are planned makes it hard to come to any conclusion. They should be provided prior to approving the General Plan.

ITEM 2

POLICY LU-1.3 EQUITABLE CREATION AND DISTRIBUTION OF OPEN SPACE

Policy states: "***Promote the creation of new open*** space and community-serving amenities in park-deficient areas that keeps pace with the increase in multi-unit housing development, with priority given to those that are also within environmental justice area boundaries. Show me where in this element how the creation of new open space will be achieved.

ITEM 3

POLICY LU-2.9 OPEN SPACE NEEDS [page LU-05]

What is being done to support this policy? Furthermore, the Citywide total increase of housing units is listed at 36,261 units. If Policy OS-1.3 were to be followed, and using the cities 2045 population buildout of over 96,000 residents, the City would need to add over 192 acres of park space to maintain an already deficient ratio. Where is this land or how is this going to be "achieved", as stated in Policy OS-1.3?



ITEM 4

FOCUS AREAS [page LU-26]

Why are we hanging our hat on the Five focus areas identified by the General Plan Advisory Committee and refined by City staff as the areas of the city most suitable for new development? I ask this because the Focus Area for Grand and 17th was revised AFTER the June 2019 community meeting

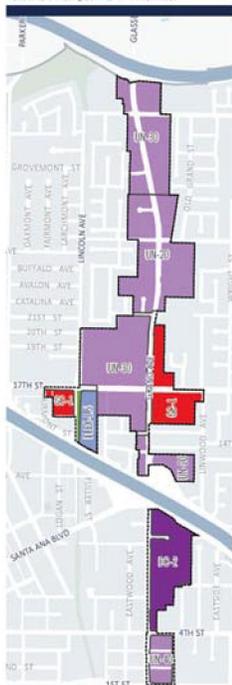
JUNE 2019

Existing Plans and Focus Areas



DRAFT PROPOSAL extends area north to the 22 freeway, south past the 5 freeway to 1st street and west to Lincoln. Not what the General Plan Advisory Committee recommended.

FIGURE LU-11 LAND USE MAP
GRAND AVENUE AND 17TH STREET



As stated on page LU-26, these focus areas are for *new development*. The Land Use Element is silent on the addition of open space.



Dale Helvig

2536 N. Valencia St. Santa Ana CA 92706

714-541-7254 helvig_denny@msn.com



ITEM 5

Figure LU-8 ARTIST RENDERING SOUTH MAIN URBAN NEIGHBORHOOD AT KEY INTERSECTION [page LU-33]

Why is a 4-story building shown when nothing along this corridor is being designated for 4-stories?

**FIGURE LU-8 ARTIST RENDERING
SOUTH MAIN URBAN NEIGHBORHOOD AT KEY INTERSECTION**



Dale Helvig

2536 N. Valencia St. Santa Ana CA 92706

714-541-7254 helvig_denny@msn.com

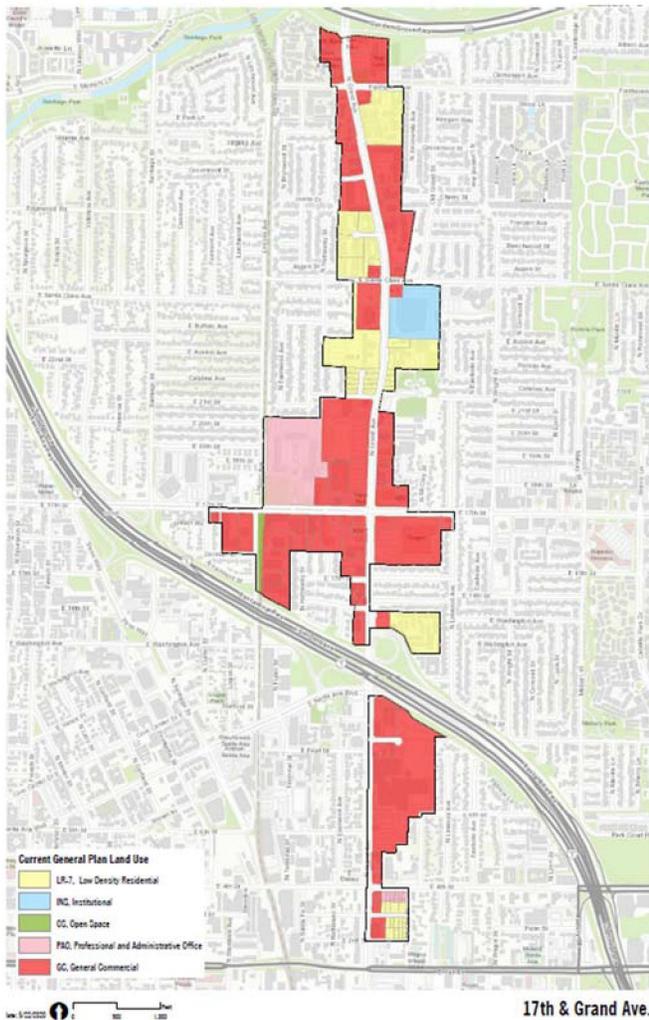


GRAND/17TH STREET FOCUS AREA [continued]

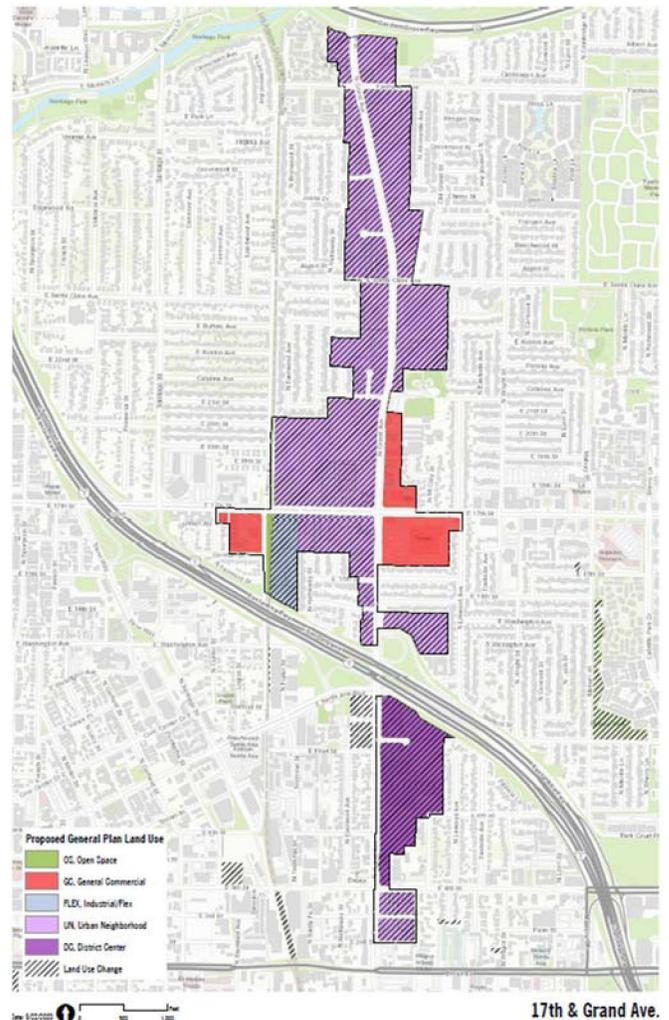
ITEM 6

The five focus areas do nothing but replace **General Commercial** and **Professional / Administrative Office** with up-zoning designations. I think it is safe to say this is nothing more than increasing the already high-density housing in Santa Ana. For a vision of the city, it lacks the vision necessary to ensure the City of Santa Ana receives the necessary development **AND** open space the residents of Santa Ana deserve.

BEFORE:



AFTER:



What is being proposed will drive people to other communities for shopping due to increased traffic and the inability to conveniently park outside a business. While I agree Grand Avenue needs attention, the desire by the city to designate the land use to **Urban Neighborhood** or **District Center** is unacceptable. It removes current land use designations that support churches, government offices, schools, electrical substations, single-family homes and multi-family homes. Proposed changes just make it easier for developers. The other Focus areas are in the same situation.



GRAND/17TH STREET FOCUS AREA [continued]

GRAND AVENUE AND 17TH STREET [page LU-40]

Travel on Grand Avenue during the morning or evening rush hour time slots. Just imagine the negative impact that will be created when 1722 housing units, approximately 4000 residents are added. I challenge the need to reclassify all these areas in this focus area, some but not all.

From page LU40: “Notes: The focus area also includes a nominal amount of land used by railroad operations and mapped with the Open Space land use designation.” I can’t believe the city will be reclassifying this area as open space. **Is the city not concerned about human safety?**



Just some food for thought...

| | Number of added Units | Housing Unit Increase [In Percent] |
|--------------------------|-----------------------|------------------------------------|
| South Main Street | 588 | 34.2 |
| Grand Avenue/17th Street | 1722 | 306.0 |
| West Santa Ana Blvd. | 1262 | 47.5 |
| 55 Freeway/Dyer Road | 8731 | 715.0 |
| South Bristol Street | 5272 | 2396.0 |



ITEM 7

Page LU-42: *“Four-story buildings should be compatible with the surrounding single-family neighborhoods.”* How is this even considered to be compatible? Current land uses made this a reality, proposed land use remove this buffer zone?

ITEM 8

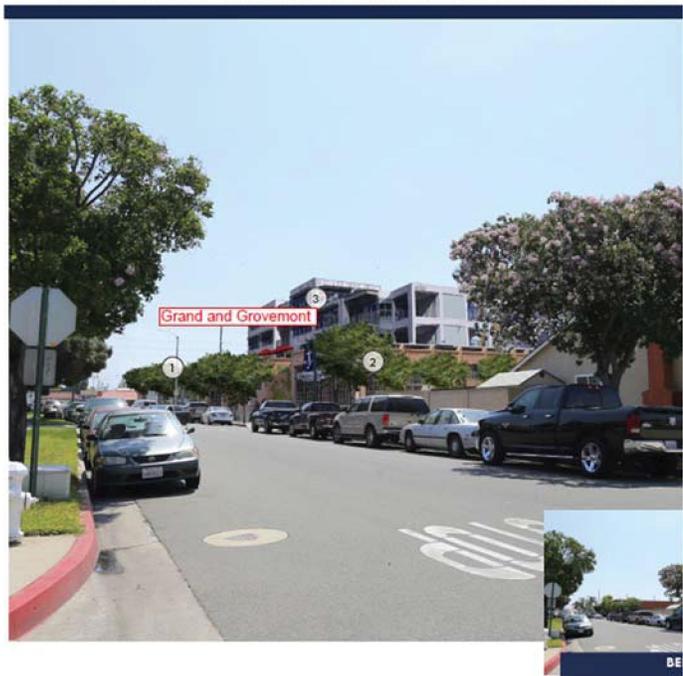
Page LU-43: Comments 1) The General Plan should not be including photos of resident vehicles with license plates, 2) inserting a picture of a five-story structure where it is proposed to be only four stories, 3) Saying, *“Careful landscaping provides a transition between single-family homes and adjacent urban neighborhood lots.”* (four-story next to single family homes). How is this possible when there will be a single-family home next to a four story? What is this *“careful landscaping”* that will cover a 50 height?

ITEM 9

Page LU-44: Figure LU-14 ARTIST RENDERING

Artist rendering, really? This building does not conform to the proposed land use. Insert something similar to what is found on page LU-43.

FIGURE LU-13 ARTIST RENDERING
VIEW OF 4-STORY GRAND AND 17TH URBAN NEIGHBORHOOD FROM ADJACENT NEIGHBORHOOD



- ① **ACTIVATE KEY INTERSECTIONS**
Commercial uses may wrap around the corner, transitioning from more urban areas to lower-density homes.
- ② **LANDSCAPE SCREENING**
Careful landscaping provides a transition between single-family homes and adjacent urban neighborhood lots.
- ③ **HEIGHT & MASSING**
Step-backs in taller buildings transition between existing low-density neighborhoods and new higher-density development.

FIGURE LU-14 ARTIST RENDERING
GRAND AND 17TH URBAN NEIGHBORHOOD AT MAJOR INTERSECTION



Dale Helvig

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ITEM 10

According to the USA.com website Santa Ana now the 4th most dense city in the *nation* for cities over 130,000 people the densest city in the *state*. Being number one is not always a good thing. We should not exacerbate the problem by continuing to add urban neighborhoods throughout the city. We should be campaigning in Sacramento seeking relief.



Local Data Search

Search State, County, City, Zip Code, or Area Code

USA.com / Ranks / U.S. Population Density City Rank / with population more than 130,000

U.S. Population Density City Rank with population more than 130,000

A total of 199 results found. [Show Results on Map.](#)

| Rank | Population Density ▼ | City / Population |
|------|--------------------------------------|--|
| 1. | 17,833.9/sq mi | New York, NY / 8,354,889 |
| 2. | 16,812.5/sq mi | Paterson, NJ / 146,341 |
| 3. | 12,137.8/sq mi | Jersey City, NJ / 255,861 |
| 4. | 12,038.2/sq mi | Santa Ana, CA / 331,266 |
| 5. | 11,586.7/sq mi | Chicago, IL / 2,712,608 |
| 6. | 10,839.8/sq mi | Philadelphia, PA / 1,546,920 |
| 7. | 10,677.2/sq mi | Newark, NJ / 278,750 |
| 8. | 10,171.4/sq mi | Hialeah, FL / 232,311 |
| 9. | 9,787.6/sq mi | Yonkers, NY / 198,654 |
| 10. | 9,680.6/sq mi | Garden Grove, CA / 173,853 |

ITEM 11

Page LU 54: 55 FREEWAY AND DYER ROAD FOCUS AREA

The intent of the 55 FREEWAY AND DYER ROAD focus area is *“to create opportunities for a truly urban lifestyle with easy access to Downtown Santa Ana, multiple transit options, and the new investments and amenities in adjacent communities”* There is no vision/description/discussion of multiple transit option. This would be a good place to discuss the extension of the OC street car.

ITEM 12

Page LU 56: Figure LU-18 LAND USE MAP 55 FREEWAY AND DYER ROAD

Adding 6-10 story mix of residential, live-work, commercial, hotel Office/industrial flex spaces over the John Wayne flight path is an accident waiting to happen. An accident that could bankrupt the city.

ITEM 13

Pages-ALL: Where is the discussion about businesses that will be displaced by focus area modifications?

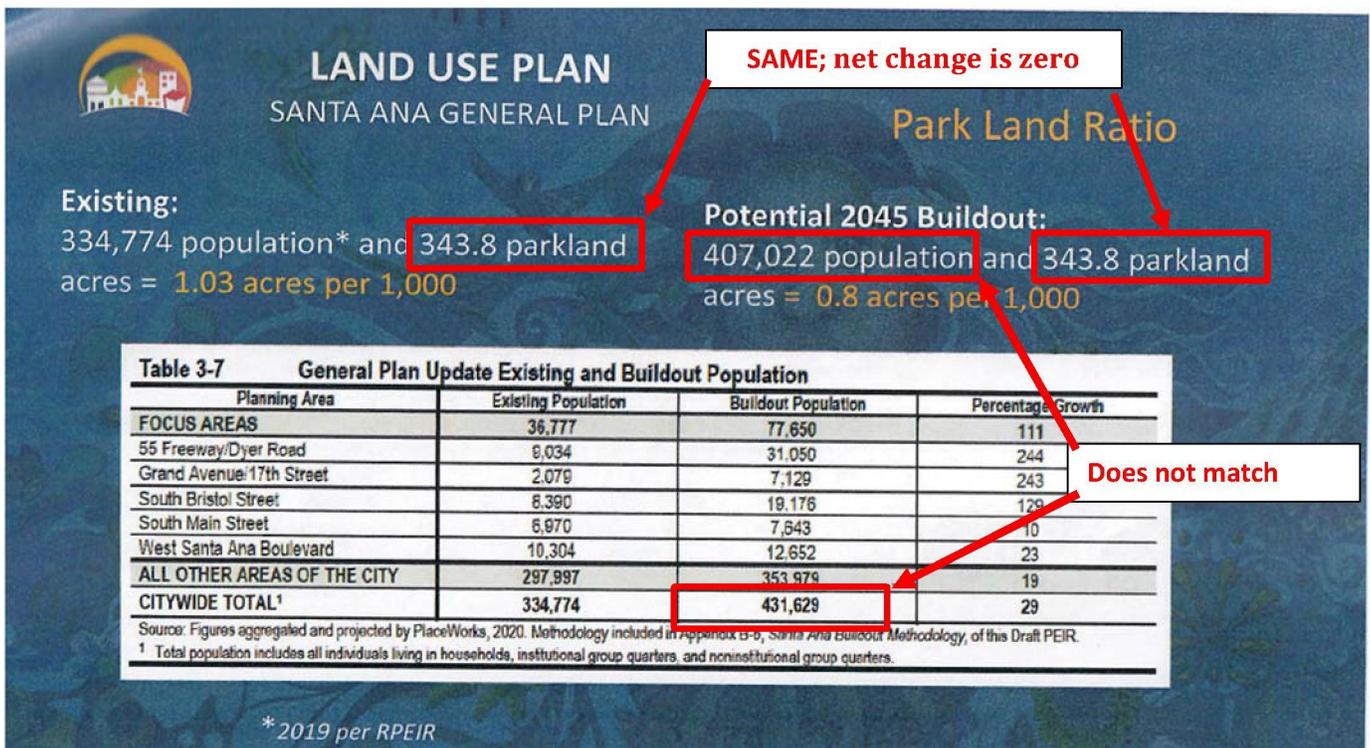
**ITEM 14
IMPLEMENTATION**

The Land Use Element does not address the **absence of 200 acres of parkland and the profound impact this will have on the physical, social, mental, and economic health and well-being of Santa Ana residents.**

**ITEM 15
GENERAL COMMENTS**

Why were areas north of the I-5 Freeway excluded from the environmental justice consideration? Homes next to the freeway in the communities of Mabury Park, Grand Sunrise and Park Santiago are areas that have environmental issues as well. There is lead in the soil, as well as other pollutants. Heavy particulates and noise concerns are also an issue due to the proximity to the freeway.

In summary, I see don't see much meat in General Plan. Although a tremendous amount of effort has been spent on this project, I see the General Plan as a blueprint for development rather than a vision for the City of Santa Ana. The draft vision of the city to strive to maintain the parkland space is not even met. With the buildout population increase of over 96,000 people, just to maintain the current deficient ratio of 1 acre per 1000 residents we need to have a vision of 192 of additional parkland space. **Notice the 2045 vision for increased parkland space is ZERO.**



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The introduction to the Open Space Element states:

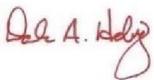
“Open space is so important that its presence (or absence) can profoundly shape the physical, social, mental, and economic health and well-being of our communities.”

Let’s live by those words and address this in the Land Use Element. The General Plan Update should reflect the vision of the community and not read so much as a developer’s handbook. We deserve the “Shared Vision” for Santa Ana.

Too much emphasis is being placed on the focus areas and not enough on the rest of the City.

Thank you for your thoughtful consideration. Stay safe, stay healthy.

Respectfully,



Dale A Helvig

Resident, Santa Ana

cc: Kristine Ridge

City Manager, Santa Ana

Sonia Carvalho

City Attorney, Santa Ana

Fabiola Melicher

Manager, Planning

Lisa Rudloff

Executive Director, Parks, Recreation & Community Services

Minh Thai,

Executive Director, Planning and Building Agency

Dale Helvig

Resident, Santa Ana CA 92706

December 7, 2021

Mayor Sarmiento and Santa Ana City Councilmembers

City of Santa Ana

20 Civic Center Plaza, 8th Floor

Santa Ana CA 92702

Santa Ana's "Golden City Beyond: A Shared Vision" General Plan is a policy document that will guide the City's development and conservation for the next 25 years through 2045. KEEP THIS IS MIND

Subject: COMMENTS ON GENERAL PLAN UPDATE – OPEN SPACE ELEMENT

OPEN SPACE ELEMENT

The purpose of the Open Space Element is to identify and preserve open space areas that provide value to the community and enrich the quality of life. [page OS-1].

GOAL OS-1: Parks, Open Space, and Recreation

ITEM 1

POLICY OS-1.3 PARK STANDARD

If you compare the previous General Plan and even the draft that was circulated in 2020, you will see that the vision for the next 25 years has been diluted. We are moving backwards by saying "**Strive** to attain a minimum of two acres of park land per 1,000 residents in the City" versus the old language of "**Achieve** a minimum park standard of two acres per 1,000 residents in the city." The 25-year plan will not be effective if we start off with weak language.

ITEM 2

POLICY OS-1.4 PARK DISTRIBUTION and POLICY OS-1.5 PARK AND OPEN SPACE TYPES

These two policies have the same exact text. This appears to be a block and copy error and it should be corrected.

ITEM 3

POLICY OS-1.8 LAND ACQUISITION AND EQUITABLE DISTRIBUTION

Proposed policy statement reads in part: "Explore options for the acquisition of available lands...".

I suggest the city add language so the existing parks, open space, greenways and trail corridors areas are preserved. The city can't move forward if they don't protect these already limited resources. While reference to "No-net-loss of parkland" can be found in the implementation it also be a part of the policy.

Concerning Willowick, where will the city acquire land to ensure no-net-loss of parkland should it be sold?

ITEM 4

POLICY OS-1.11 FUNDING SOURCES

*“Set aside park funding to have monies on hand **to acquire and develop parkland when opportunities arise** and to leverage grant options.”* The city should take a proactive step and identify areas within the city that can be earmarked for parkland areas. Saying this will be covered by the Park Master Plan is not the same as having something in the General Plan. One can have vast amounts of funds but it means nothing if we allow commercial and residential development to buy up all available space.

ITEM 5

Table OS-1. OPEN SPACE RESOURCES [page OS-8]

The Note at the bottom of the table states: *“**The list of parks and acreage figures are accurate as of August 2020. All figures are subject to rounding.**”* I recommend you take another look at the numbers. All areas are shown with two significant digits yet the subtotals are shown with either one or two significant digits. Check your math, the total parks/rec facilities acreage adds up to 409.65 acres versus the 409.2 acres shown, not much of a difference but every bit is important for a park deficient city.

ITEM 6

Figure OS-2 WALKING DISTANCE TO PARK FACILITIES

The key at the bottom of the page says: *“Walking Distance From Existing or Proposed Park”*. **Where are the proposed parks?** Additionally, the area depicting the ¼ mile around parks is inaccurate [look at Portola Park and Santiago Park].

ITEM 7

GOAL OS-2: Healthy, Safe and Inclusive Opportunities

POLICY OS-2.4 URBAN AGRICULTURE AND HEALTHY FOODS

*“**Expand urban agriculture opportunities in private development and public spaces.**”* Language could be added to establish community gardens, or other public benefit use, on vacant/abandoned city property.

ITEM 8

GOAL OS-3: Park Maintenance, Stewardship, and Sustainability

POLICY OS-3.8 NATURALIZING THE SANTA ANA RIVER

Request this be expanded to include the Santiago Creek.

ITEM 9

Table OS-2. RELATED GENERAL PLAN POLICIES [page OS-15]

TYPO. “Goal OS-1, for example, is supported not only by the policies listed in this element (OS-1.1 through OS-3.6)”. Should be “...through OS-**3.8**)”

TYPO. Open Space Goal OS-1 is not accurate, it has the words found in the 2020 draft versus what is listed in the 2021 draft. It should say. *“**Provide an integrated system of accessible parks, recreation facilities, trails, and open space to serve the City of Santa Ana.**”*

ITEM 10

Table OS-3. OPEN SPACE ELEMENT IMPLEMENTATION

There should be at least a one-to-one correlation between a policy and an implementation action. This should be clearly identified in Table OS-3. **Example:** POLICY OS-1.6 PARK ACCESS AND CONNECTIVITY says it will “Create a Safe Routes to Parks program that establishes and enhances access to existing and new parks and recreation facilities through safe walking, bicycling, and transit routes.” This has nothing to do with implementation item 1.6. which is listed as “**Development fees.** Evaluate the fees required by the City’s Residential Development Fee Ordinance and adjust them to better reflect current costs and needs. Update requirements regarding where fees are spent. **I consider this a fatal flaw in the process that needs to be fixed in all elements.**”

ITEM 11

Table OS-2. RELATED GENERAL PLAN POLICIES

OS-3: Park Maintenance, Stewardship, and Sustainability lacks any input/link to the Land Use Element.

ITEM 12

OS-1.4 Implementation Action [page OS-16]

Is Parks, Recreation and Community Services Agency really the correct agency to make this happen? Action 1.4 states: *“No-net-loss of parkland. Establish land use provisions in the Municipal Code that prevent a net loss of public parkland in the city.” Require at least a 1:1 replacement if there is any loss of public parkland due to public or private development.*”

ITEM 13

OS-1.7 Implementation Action [page OS-17]

“...Consider allowing developers a reduction in on-site open space by giving credits for park development or the provision of private park land. Incentivize the creation of public parks that exceed City requirements, especially within park deficient and environmental justice areas.”

This is written for developer’s consideration rather than the residents of Santa Ana.

GENERAL COMMENTS

ITEM 14

1. Why were areas north of the I-5 Freeway excluded from the environmental justice consideration? Homes next to the freeway in the communities of Mabury Park, Grand Sunrise and Park Santiago are inedited with black particulate and noise as much as other areas that are impacted by the freeway.

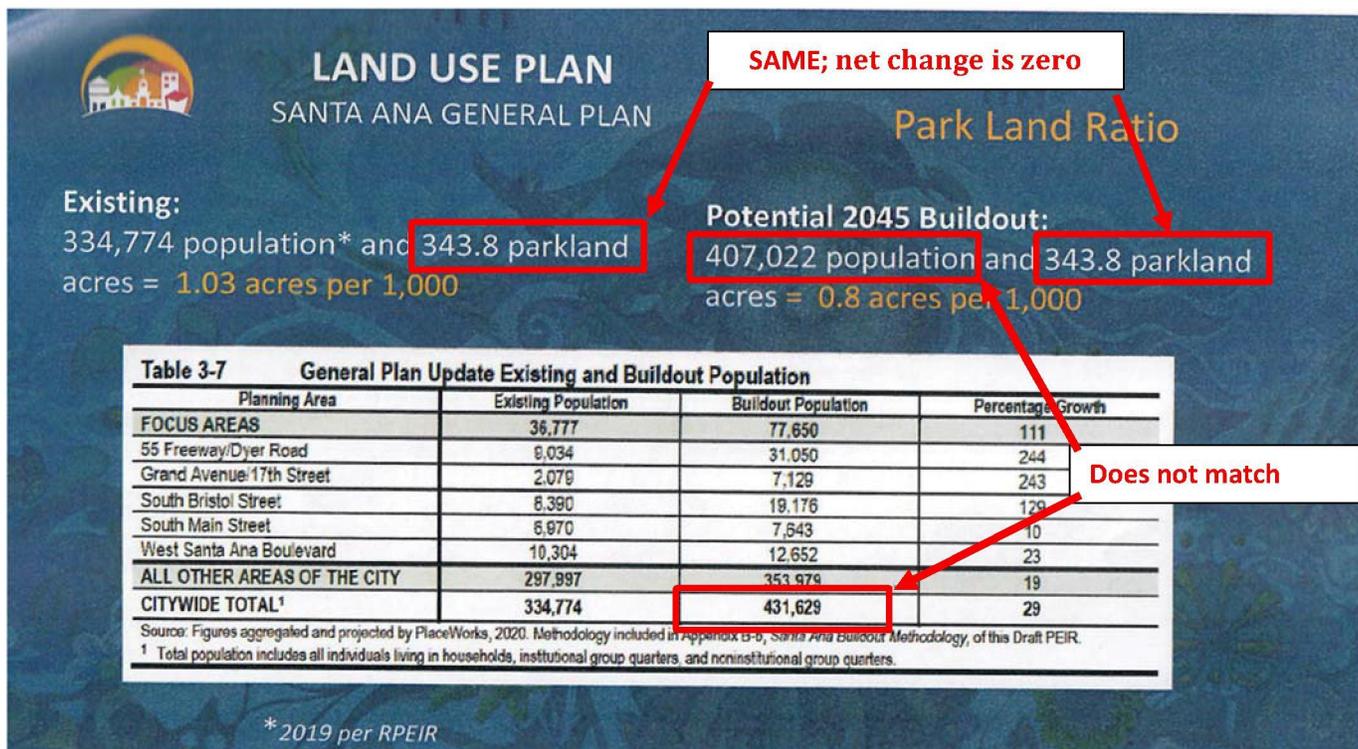
ITEM 15

2. Having words like consider, strive and in policy statements leaves a lot of wiggle room in trying to meet the objectives.

ITEM 16

3. A small sampling of these changes revealed that errors exist between the PEIR and the General Plan Update. For me personally, I don’t know which document to believe. This must be corrected so the Planning Commission, the public and eventually the City Council understand what is correct:

In summary, I see don't see much meat in General Plan. Although a tremendous amount of effort has been spent on this project, I see the General Plan as a blueprint for development rather than a vision for the City of Santa Ana. The draft vision of the city to strive to maintain the parkland space is not even met. With the buildout population increase of over 96,000 people, just to maintain the current deficient ratio of 1 acre per 1000 residents we need to have a vision of 192 of additional parkland space. **Notice the 2045 vision for increased parkland space is ZERO.**



The introduction to the Open Space Element states:

“Open space is so important that its presence (or absence) can profoundly shape the physical, social, mental, and economic health and well-being of our communities.”

Let's live by those words. The General Plan Update should reflect the vision of the community and not read so much as a developer's handbook. We deserve the "Shared Vision" for Santa Ana.

State Sen. Dave Min (D- Irvine) was quoted as saying¹,

“Open space preservation is smart policy, which not only supports our sustainability efforts but also improves the quality of life for our residents and brings our community together.”

Irvine has the right idea and we can benefit if we copy them.

¹ SUNDAY, AUGUST 15, 2021, Times OC

Dale Helvig

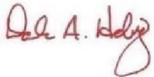
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Respectfully,



Dale A Helvig

Resident, Santa Ana

cc: Kristine Ridge

City Manager, Santa Ana

Sonia Carvalho

City Attorney, Santa Ana

Fabiola Melicher

Manager, Planning

Lisa Rudloff

Executive Director, Parks, Recreation & Community Services

Minh Thai,

Executive Director, Planning and Building Agency



October 6, 2021

Via Email

Santa Ana City Council
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jessielopez@santa-ana.org,
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jryanhernandez@santa-ana.org,
nmendoza@santa-ana.org

Re: Santa Ana General Plan Update Open Space Element

Dear Mayor Sarmiento and Councilmembers Phan, Penaloza, Lopez, Bacerra, Hernandez, and Mendoza:

Rise Up Willowick appreciates the opportunity to comment on the City of Santa Ana's August 2021 draft General Plan Update ("the Update"). A memo to the Planning Commission on the Update's Open Space Element is attached as Exhibit A.¹ We previously submitted comments on an earlier draft of the Update in an October 6, 2020 letter to City planning staff, attached as Exhibit B, and a November 9, 2020 letter to the Planning Commission, attached as Exhibit C. Those earlier comments remain relevant to the draft Update and are hereby incorporated by reference.

The policies and implementation actions in the Update's Open Space Element seek to avoid loss of parkland and create new public parkland, prioritizing currently underserved areas and requiring private developments to create public open space. We commend the City for revising these measures in response to public comments received on the previous draft Update. However, the Open Space Element still falls short in several respects.

¹ These comments do not discuss the adequacy of the Update's accompanying Recirculated Draft Program Environmental Impact Report ("RDPEIR") under the California Environmental Quality Act, which is addressed in a separate letter to City planning staff submitted on behalf of Rise Up Willowick by Shute, Mihaly & Weinberger LLP.

Most importantly, the City's standard of two acres of parks per 1,000 residents is not sufficient to meet the needs of City residents and is much less than the ratio of parkland to residents in other comparable jurisdictions. The City should increase its park standard from two to three acres of parkland per 1,000 residents. The City does not meet its current, low standard, and under the Update the total "parkland deficiency" is projected to increase further, from 118.14 acres to 299.48 acres at build-out unless the City develops new parks. RDPEIR at 5.15-28. In order to address this parkland deficiency and meet the needs of City residents, the City needs more ambitious policies to facilitate parkland creation.

The City should increase the Open Space Element's park standard to a ratio of three acres per 1,000 residents, and should amend the Municipal Code to reflect this standard. In addition, as outlined in the attached memo, we urge the City to revise the Open Space Element to:

- (1) define the terms "parks," "parkland," "open space," "park deficient area" and "environmental justice area,"
- (2) apply the "no net loss" policy to open space as well as to parkland and strengthen provisions on replacement of lost open space,
- (3) increase parkland dedication requirements for new development projects in order to meet the City's enhanced park standard,
- (4) extend parkland dedication requirements to a broader range of market-rate development projects,
- (5) require that parkland created by dedication be located within a half-mile walking distance of the associated development, and
- (6) include more specific incentive mechanisms to create new parkland, especially within park deficient and environmental justice areas.

The attached memo suggests language for General Plan policies and implementation actions that would address each of these issues. We respectfully request that the City revise the Open Space Element to reflect these proposals. Thank you for your consideration.

Very truly yours,

Rise Up Willowick



Cynthia Guerra

List of Exhibits:

Exhibit A: Rise Up Willowick, Comments to City of Santa Ana Planning Commission re: Proposed Changes to Open Space Element of City of Santa Ana General Plan Update, September 15, 2021.

Exhibit B: Letter from Rise Up Willowick to Verna Carvajal re: Comments on Santa Ana General Plan Update DPEIR, October 6, 2020.

Exhibit C: Letter from Rise Up Willowick to the City of Santa Ana Planning Commission re: Santa Ana General Plan Update EIR, November 9, 2020.

cc: General Plan Email: newgeneralplan@santa-ana.org
Public Comment Email: ecomments@santa-ana.org
Planning Dept. Director Minh Tai: mthai@santa-ana.org
Principal Planner Melanie McCann: mmccann@santa-ana.org
Planning Commissioners: mmcloughlin@santa-ana.org; tmorrissey@santa-ana.org;
ealderete@santa-ana.org; mcalderson@santa-ana.org; bpham@santa-ana.org;
iramos@santa-ana.org; awoo@santa-ana.org

EXHIBIT A



TO: City of Santa Ana Planning Commission
FROM: Rise Up Willowick
DATE: September 15, 2021
RE: Proposed Changes to Open Space Element of City of Santa Ana General Plan Update

Rise Up Willowick proposes the following changes and additions to the Open Space Element of the City of Santa Ana’s August 2021 draft General Plan Update.

1. Definitions of Key Terms

The Open Space Element lacks definitions for key terms used in several policies and implementation actions involving parks and open space. These definitions are needed to clarify the scope and effects of those policies and actions. We propose modifying the Open Space Element to define “parks” and “parkland” with reference to the Municipal Code’s existing definition of “parks”:

As used in the Open Space Element, “parks” and “parkland” have the same meaning as “parks” as defined in Municipal Code Section 31-1 (4).

We propose modifying the Open Space Element to define “open space” as follows:

As used in the Open Space Element, “open space” means “any publicly-accessible parcel or area of land or water, whether publicly or privately-owned, that is reserved for the purpose of preserving natural resources, for the protection of valuable environmental features, or for providing outdoor recreation or education.”

We propose amending the Municipal Code to include this definition of “open space,” which is not currently defined in the code.

We propose modifying the Open Space Element to define “park deficient area” as follows:

As used in the Open Space Element, “park deficient area” means “a geographic area which is located more than 0.25 miles from the nearest public park of 5 acres or less and more than 0.5 miles from the nearest public park larger than 5 acres as measured along the shortest available pedestrian route.”

This is a modified version of the definition used in the August 2021 Recirculated Draft Program Environmental Impact Report (RDPEIR) for the General Plan Update. RDPEIR at 5.15-12, 5.15-13.¹

We propose modifying the Open Space Element to define “environmental justice area” as follows:

As used in the Open Space Element, “environmental justice area” means “a disadvantaged community as defined by Government Code Section 65302(h)(4)(A), i.e. a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation, or an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code.”

This definition of “environmental justice area” is consistent with the RDPEIR, which references SB 1000’s definition of “disadvantaged community.” Gov. Code § 65302(h)(4)(A); RDPEIR at 4.15-4.16, 5.15-12, 5.15-15. The California Environmental Protection Agency has identified 23 census tracts in Santa Ana as environmental justice communities because they have received a California Communities Environmental Health Screening (CalEnviroScreen) composite score greater than 75 percent. RDPEIR at 2-19, 4-15.

2. Proposed Addition of “No Net Loss of Open Space” Policy in General Plan Update

We propose the addition of a “no net loss of open space” policy in the Open Space Element:

Policy OS-1.14: No Net Loss of Open Space. There shall be no net loss of Open Space in the city, excluding any acreage of a golf course that is redeveloped solely for 100% below-market rate housing. Any Open Space lost due to development shall be replaced at a ratio of at least 1:1.

¹ The RDPEIR maps park deficient areas using aerial linear distances to the closest park, rather than actual on-the-ground walking distances, which are typically longer due to a lack of direct routes. We propose using on-the-ground walking distances.

Although the Open Space Element already includes a “no net loss of parkland” implementation action (discussed below), the “no net loss” concept is so important and fundamental that it should be articulated as a policy as well. Moreover, given the shortage of both parks and open space in the City, this policy should apply to all open space, not merely to parkland. The City already has a “parkland deficiency” of 118.14 acres, which is expected to increase to 299.48 acres under the Update unless new parks are built. RDPEIR at 5.15-28. Non-park open space provides an important supplemental recreational resource, and can potentially be developed into parkland in the future. The City cannot afford to lose any of its existing parkland or open space acreage.

3. Proposed Changes to the Update’s “No Net Loss” Implementation Action

The draft Open Space Element currently includes this provision:

Implementation Action [OS-]1.4: No-net-loss of parkland. Establish land use provisions in the Municipal Code that prevent a net loss of public parkland in the city. Require at least a 1:1 replacement if there is any loss of public parkland due to public or private development.

City of Santa Ana Draft General Plan Update, Open Space Element, at 16. The City proposes to enact the no-net-loss ordinance in 2022; the City’s Parks, Recreation and Community Services Agency (PRCSA) would be responsible.

We commend the City for including this “no net loss” implementation action in the Update. However, as explained above, this provision should apply to all open space, not only to parkland. The implementation action should specify that net loss of open space will be avoided by prohibiting development that causes such a net loss. Moreover, the provision should clarify that replacement parks and open space must be located within 0.5 miles of the lost parks and open space, to ensure that the replacements serve the same communities. Finally, the implementation action should require that development of replacement parks and open space occur before the closure of the lost parks or open space. This will ensure that there is not a lag or “gap” in time where communities lose park or open space access if the replacement process is delayed.

We propose modifying Open Space Element Implementation Action OS-1.4 to read as follows:

Implementation Action OS-1.4: No Net Loss of ~~parkland~~ Open Space. Establish land use provisions in the Municipal Code that ~~prevent~~ prohibit development that causes a net loss of ~~public parkland~~ Open Space in the city, including City parks as well as other public and private land designated as Open Space under the General Plan or the zoning code, but excluding any acreage of a golf course that is

redeveloped solely for 100% below-market rate housing. Require that any loss of Open Space be replaced at a ratio of at least a 1:1 replacement if there is any loss of public parkland due to public or private development., that loss of public parks be replaced by new public parks, and that replacement Open Space (including public parks) be located within 0.5 miles walking distance from the lost Open Space. Require that a plan for replacement, including specific location of replacement land, be approved before or as part of approval of any project that would change the use of existing parks or Open Space. Require that development of replacement parks or Open Space occur prior to the closure or redevelopment of the lost parks or Open Space.

4. Proposed Changes to the Open Space Element’s “Park Standard”

The draft Open Space Element currently includes this “park standard” policy:

Policy OS-1.3: Park Standard. Establish and maintain public open space and recreation requirements for new residential and nonresidential development to provide sufficient opportunities for Santa Ana residents and visitors. Strive to attain a minimum of two acres of park land per 1,000 residents in the City.

City of Santa Ana Draft General Plan Update, Open Space Element, at 5. This parkland-to-resident standard is already reflected in Municipal Code Section 35-108(a), which provides that “[d]evelopment of parks within the city will require the construction of park and recreation facilities sufficient to provide two (2) acres of such facilities per one thousand (1,000) population in the city.”

The August 2021 RDPEIR for the General Plan Update acknowledges that the City currently does not meet this per-resident standard, and under the Update the total “parkland deficiency” is projected to increase further, from 118.14 acres to 299.48 acres at build-out unless additional parks are provided. RDPEIR at 5.15-28.

The City’s standard of two acres of parks per 1,000 residents is not sufficient to meet the needs of City residents and is much less than the ratio of parkland to residents in other jurisdictions. According to the National Recreation and Park Association, the typical jurisdiction has a median of 9.9 of acres of parkland for every 1,000 residents, while jurisdictions of more than 250,000 people (like Santa Ana) have a median of 10.9 acres of parkland per 1,000 residents.² Nationally, the bottom quartile of jurisdictions over 250,000 people have a median of 5.3 acres of parkland per 1,000 residents.

² National Recreation and Park Association, NRPA Agency Performance Review 8 (2020), <https://www.nrpa.org/siteassets/nrpa-agency-performance-review.pdf>

The City's parkland standard is also less than the standard set out in the Quimby Act, Government Code section 66477, which allows cities to require that subdivisions dedicate parkland sufficient to provide up to three acres of park area per 1,000 subdivision residents.

Moreover, Policy OS-1.3 has been weakened from the version included in the 2020 draft Update. While the previous draft policy called for the City to "achieve" a park ratio of two acres per 1,000 people (2020 Draft Open Space Element at 5; Final Environmental Impact Report at 2-17), the new draft merely says the City will "strive to attain" that standard. Open Space Element at 5. Given the importance of addressing the City's park deficiency, the policy's language should be mandatory.

We therefore propose revising Policy OS-1.3 to read as follows:

Policy OS-1.3: Park Standard. Establish and maintain public open space and recreation requirements for new residential and nonresidential development to provide sufficient opportunities for Santa Ana residents and visitors. ~~Strive to attain~~ The City shall achieve a minimum citywide park ratio of two three acres of park land per 1,000 residents in the City. For new residential development in Focus Areas, the City shall prioritize the creation and dedication of new public parkland over the collection of impact fees.

We also propose that the Update include an additional implementation action calling for the City to amend the Municipal Code to reflect this standard:

Implementation Action OS-1.16. Park Standard. Amend Municipal Code Chapter 35, Article IV to require that the City achieve a minimum citywide park ratio of three acres per 1,000 residents.

5. Proposed Changes to the Open Space Element's Policies on Parkland Creation and Distribution

The Open Space Element currently includes the following policies relating to parkland creation and distribution:

Policy OS-1.4. Park Distribution. Ensure the City residents have access to public or private parks, recreation facilities, or trails within a 10 minute walking and biking distance of home. Prioritize park provision, programs, and partnerships in park deficient an[d] environmental justice areas.

RDPEIR at 5.15-20.³

Policy OS-1.8. Land Acquisition and Equitable Distribution. Explore options for the acquisition of available lands for parks, open space, greenways and trail corridors, with priority given to sites that are within park deficient or environmental justice areas.

Open Space Element at 6.

Rise Up Willowick supports the Policy's stated goal of more equitable park distribution in park deficient and environmental justice areas. We commend the City for including Policy OS-1.4 and Policy OS-1.8. However, Policy OS-1.4 should use a 0.5 mile walking distance to measure park proximity, a more objective metric than a 10-minute walking distance, which varies depending on a pedestrian's physical capabilities. Policy OS-1.8 should direct the City to acquire new parkland, not merely to "explore options" for doing so.

We propose strengthening and clarifying these policies as follows:

Policy OS-1.4. Park Distribution. Ensure ~~the~~that all City residents have access to public ~~or private~~ parks, recreation facilities, ~~or~~and trails within a ~~10-minute~~0.5 mile walking ~~and biking~~ distance of ~~home~~their homes. Prioritize park provision, programs, and partnerships in park deficient and environmental justice areas.

Policy OS-1.8. Land Acquisition and Equitable Distribution. ~~Explore options for the acquisition of~~Acquire available lands for parks, open space, greenways and trail corridors, with priority given to sites that are within park deficient ~~or~~and environmental justice areas.

The Open Space Element includes the following provision regarding park-deficient areas:

Policy OS-1.10. Creative Solutions for Deficiencies. Develop creative and flexible solutions to provide greenspace and recreation activities in neighborhoods where

³ There is an error in the draft General Plan Update, which replaces Policy OS-1.4 with language identical to Policy OS-1.5 ("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"), thus repeating the same policy twice. We assume that the version of Policy OS-1.4 provided in the RDPEIR (quoted above) contains the correct language.

traditional parks are not feasible. Encourage public, private, and commercial recreational facilities in areas that are park deficient.

Open Space Element at 6.

While we support the use of “creative solutions” to address park deficiencies, Policy OS-1.10 requires clarification. We are concerned by the suggestion that there are neighborhoods where “traditional parks are not feasible.” The City’s long term goal should be to provide public parkland in all park-deficient areas. Moreover, this policy should be revised to make clear that while private or commercial recreational facilities can be a valuable community resource, they are never a substitute for public parkland. The City should not abandon efforts to create public parks in park-deficient areas merely because those areas contain private or commercial recreational facilities. Such private facilities do not always serve the communities in which they are located and do not provide the spectrum of activities that public parks do. For example, some private recreational facilities (such as golf courses) can exclude lower-income people, and thus could fail to serve residents in surrounding neighborhoods.

We propose modifying Policy OS-1.10 as follows:

Policy OS-1.10. Creative Solutions for Deficiencies. Develop creative and flexible solutions to provide greenspace and recreation activities in park-deficient neighborhoods where traditional parks are not feasible. Prioritize public parks and recreational facilities in park-deficient areas. Encourage ~~public,~~ private, and commercial recreational facilities ~~in areas that are park deficient.~~ that are open to the public, are physically accessible and affordable to residents of surrounding neighborhoods, and serve community needs.

The Open Space Element also includes the following implementation action regarding new parkland:

Implementation Action 1.10: New parkland. Coordinate with property owners to explore options to provide public access and programming in park deficient areas, including options to acquire land through purchase, land dedication, easements, and land leases that would allow for permanent or temporary use of land for recreational opportunities.

Open Space Element at 17.

Like Policy OS-1.8, Implementation Action 1.10 should direct the City to acquire new parkland. It should prioritize creation of new permanent public parkland. Other temporary mechanisms can be a helpful supplement. However, these mechanisms will not provide the same level of permanent public benefits or allow the same range of public

uses. They are therefore not a substitute for permanent public parkland. The City should not rely on privately-owned open space to increase recreational opportunities in park-deficient areas.

We propose revising this provision as follows:

Implementation Action 1.10: New parkland. Create new public parkland in park-deficient areas via purchase or land dedication. In addition, coordinate with property owners to explore options to provide public access and programming on privately-owned open space in park deficient areas, including options to acquire land through purchase, land dedication, and obtain easements, and or land leases that would allow for permanent or temporary public use of land such open space for recreational opportunities.

6. Proposed Changes to the Open Space Element's Policy on New Development

The Open Space Element currently includes the following policy on new development:

Policy OS-1.9: New Development. Ensure all new development effectively integrates parks, open space, and pedestrian and multi-modal travelways to promote a quality living environment. For new development within park deficient and environmental justice areas, prioritize the creation and dedication of new public parkland over the collection of impact fees.

Open Space Element at 6.

We propose revising this policy to clarify that new developments must create public parkland via the mechanisms described in Implementation Actions OS-1.6 and OS-1.7 in order to meet the citywide park standard set in Policy OS-1.3:

Policy OS-1.9: New Development. Require that Ensure all new development effectively integrates parks, open space, and provide adequate parks and open space, including via parkland dedication or development fees, in order to meet the City's park standard. Ensure that new development includes pedestrian and multi-modal travelways to promote a quality living environment. For new development within park deficient and environmental justice areas, prioritize the creation and dedication of new public parkland over the collection of impact fees.

7. Proposed Changes to the Open Space Element's Development Fee Requirements

The draft Open Space Element currently includes the following provision:

Implementation Action [OS-]1.6. Development fees. Evaluate the fees required by the City's Acquisition and Development Ordinance and adjust them to better reflect current costs and needs. Update requirements regarding where fees are spent.

Open Space Element at 16. The City proposes to implement the action in 2022.

Implementation Action 1.6 has been modified from the version in the previous 2020 draft Update, and is now much less specific than before. That earlier version (previously Implementation Action 1.8) called for the City to

[c]onsider updating the City's Acquisition and Development Ordinance to better reflect current costs and needs by increasing the parkland dedication requirement, and require that fees collected in place of parkland dedication for specific development projects be utilized to acquire, expand, or improve facilities within the same quadrant or geographic subarea (as defined in the Parks Master Plan) as the project for which the fee was collected.

2020 Draft Open Space Element at 15. The more specific language in the earlier version of the implementation action should be retained in order to strengthen the City's development fee program. In particular, development fees should be used to provide new parkland in the same neighborhood impacted by the development. That geographic limitation should be based on walking distance from the development project (the same approach used for the park dedication requirements in Implementation Action OS-1.7), rather than "quadrant or geographic subarea."

We propose revising Implementation Action OS-1.6 as follows:

Implementation Action OS-1.6. Development fees. ~~Evaluate the fees required by~~ Update the City's Acquisition and Development Ordinance and adjust them to better reflect current costs and needs. Update to increase the parkland dedication requirements regarding where fees are spent for new development projects consistent with the dedication requirements specified in Implementation Action OS-1.7. Require that fees collected in place of parkland dedication for specific development projects be utilized to acquire, expand, or improve facilities within 0.5 miles walking distance from the project for which the fee was collected.

8. Proposed Changes to the Open Space Element's Parkland Dedication Requirement

The Open Space Element currently includes the following provision:

Implementation Action [OS-]1.7. Public parkland requirements for larger residential projects. Update the Residential Development Fee Ordinance for Larger Residential Projects to require public parkland within a 10-minute walking distance of the new residential projects. Consider allowing developers a reduction in on-site open space by giving credits for park development or the provision of private park land. Incentivize the creation of public parks that exceed City requirements, especially within park deficient and environmental justice areas. Establish incentives for coordination between two or more residential projects (of any size) to create larger and/or more centralized public park space, such as exploring housing density bonus options for the provision of open space as a public benefit and leverage Residential Development fee to partner with developers to create public open space.

Open Space Element at 17. The City proposes to implement the action in 2022.

Implementation Action 1.7 has been modified extensively from the version included in the previous 2020 draft Update, with many of the specifics have been deleted. The earlier version (formerly Implementation Action 1.15) provided:

Implementation Action 1.15. Public parkland requirements for larger residential projects. Amend the Residential Development Fee in the Municipal Code (Chapter 35, Article IV) to reflect requirements for Larger Residential Projects (100+ units, residential only or mixed-use) to facilitate the creation two acres of new public parkland within a 10-minute walking radius of the new residential project. Establish provisions that allow the Larger Residential Projects to reduce all onsite private and common open space requirements by 50 percent if new public parkland is provided within a 10 minute walking radius and by 80 percent if the new public parkland is immediately adjacent to or on the residential project property. Work with property owners and new development projects within the Focus Areas to identify options (e.g., 100 percent reduction of onsite private and public open space requirements) that would incentivize the creation of public park areas that are more than the minimum and/or if a location can expand park access for an adjoining underserved neighborhood and/or environmental justice area. Establish incentives for coordination between two or more residential projects (of any size) to create larger and/or more centralized public park space.

2020 Draft Open Space Element at 16. The new draft weakens the Update by replacing much of the action's detail with general statements. The more detailed version should be restored, with further changes as outlined below.

The Santa Ana Municipal Code already requires that subdivision map approvals for residential subdivisions of more than 50 parcels dedicate parkland sufficient to

provide two acres of park area per 1,000 people residing in the subdivision. The Quimby Act, Government Code section 66477, authorizes more than that, allowing cities to require that subdivisions dedicate parkland sufficient to provide up to three acres of park area per 1,000 subdivision residents.

We propose modifying Implementation Action OS-1.7 to use all the authority the Quimby Act gives the City. It should require that subdivision dedications of parkland be sufficient to achieve a standard of three acres of parkland per 1,000 residents. In addition, we suggest modifying Action OS-1.7 to require that new $\geq 80\%$ market-rate, non-subdivision developments of 100 or more units dedicate three acres of new public parkland, and that $\geq 80\%$ market-rate non-subdivision developments of 50 to 99 units dedicate two acres of public parkland. These changes will help to address the City's parkland deficit, meet the General Plan's parkland standard, and promote equitable park access.

We also suggest changing the limit on the location of dedicated parkland from a "10-minute walking radius" of the development, a subjective measure that varies depending on a pedestrian's physical capabilities, to a 0.5-mile walking radius, a more objective metric. The revised Implementation Action would read as follows:

Implementation Action OS-1.7. Public parklands requirements for larger residential projects. Update the Residential Development Fee Ordinance for Larger Residential Projects to require public parkland within a 10-minute walking distance of the new residential projects. Amend Municipal Code Chapter 34, Article VIII to require that subdivision map approvals for residential subdivisions of more than 50 parcels dedicate parkland sufficient to provide three acres of park area per 1,000 people residing in the subdivision, consistent with Policy OS-1.3. Amend Municipal Code Chapter 35, Article IV to require that projects including 100+ residential units that are 80 percent market-rate or more and do not require a subdivision dedicate three acres of new public parkland concurrent with the completion of and within a 0.5-mile walking radius of the new residential project, and to require non-subdivision projects of 50 to 99 residential units that are 80 percent market-rate or more to dedicate two acres of public parkland concurrent with the completion of and within a 0.5 mile walking radius of the project. Consider allowing developers a reduction in on-site open space by giving credits for park development or the provision of private park land. Establish provisions that allow these projects to reduce all onsite private and common open space requirements by 50 percent if new public parkland is provided within a 0.5-mile walking radius and by 80 percent if the new public parkland is immediately adjacent to or on the residential project property. To the greatest extent possible, parkland created via this dedication process shall be located in park-deficient neighborhoods and environmental justice areas. Incentivize the creation of public

parks that exceed City requirements, especially within park deficient and environmental justice areas. Establish incentives for coordination between two or more residential project (of any size) to create larger and/or more centralized public park space, such as a housing density bonus for the provision of open space as a public benefit and leveraging of Residential Development fees to partner with developers to create public open space.

9. Clarification of the Open Space Element’s Incentives for Parkland Creation

The new draft Open Space Element deletes an implementation action included in the previous 2020 draft (Implementation Action OS-1.16), which indicated that the City should “[d]evelop an incentives program that encourages private development and public agencies to provide park and recreation facilities beyond the minimum requirements.”

Similarly, Implementation Action OS-1.7 now calls for the City to “[i]ncentivize the creation of public parks that exceed City requirements, especially within park deficient and environmental justice areas” and to “[e]stablish incentives for coordination between two or more residential projects (of any size) to create larger and/or more centralized public park space, such as exploring housing density bonus options for the provision of open space as a public benefit and leverag[ing] Residential Development fee[s] to partner with developers to create public open space.” The Open Space Element should describe these incentives in greater detail.

As suggested by Action OS-1.7, the City could provide a density bonus to development projects that exceed public parkland dedication requirements. This would be similar to the density bonuses provided to projects containing below-market-rate units under Government Code section 65915 (codified in Santa Ana Municipal Code Chapter 41, Article XVI.I). The density bonus could be provided on a sliding scale: development projects which exceed minimum parkland dedication by a greater amount would receive a larger bonus. The size of the maximum density bonus for additional parkland dedication should be no greater than the 25% maximum density bonus for below-market-rate units under the City’s existing density bonus ordinance. Santa Ana Municipal Code § 41-1604(a). However, development projects which include below-market-rate units *and* dedicate more parkland than required should be eligible to receive *both* the parkland density bonus and the affordable housing density bonus. Use of one bonus should not preclude or limit the use of the other.

In the previous draft of the Open Space Element, Implementation Action 1.15 suggested a “100 percent reduction of onsite private and public open space requirements” if a development dedicates public park areas that exceed the minimum dedication requirement. 2020 Draft Open Space Element at 16. The City should consider a revised version of this incentive: reductions of onsite open space should reflect the amount by

which parkland dedication exceeds minimum requirements. For example, a development would receive a 90% reduction in the onsite open space requirement if it dedicates 0.5 acres more than the required amount of parkland and a 100% reduction if it dedicates 1 acre more parkland than required.

10. Proposed Changes to the Open Space Element's Funding Policies

The Open Space Element currently includes the following policy:

Policy OS-1.11: Funding Sources: Explore and pursue all available funding, including nontraditional funding sources, for park acquisition, facility development, programming, and maintenance of existing and new parks. Set aside park funding to have monies on hand to acquire and develop parkland when opportunities arise and to leverage grant options.

Open Space Element at 6.

We commend the City's commitment to pursue all available funding sources for parks. Given the current park deficiency in the City, the City should set an explicit goal to obtain enough funding for new park development to meet a park standard of three acres per 1,000 residents (see proposed changes to Policy OS-1.3 above). We propose modifying Policy OS-1.11 as follows:

Policy OS-1.11: Funding Sources: Explore and pursue all available funding, including nontraditional funding sources, for park acquisition, facility development, programming, and maintenance of existing and new parks, in order to increase park investment per resident and meet the City's Park Standard of three acres per 1,000 residents (Policy OS-1.3). Set aside park funding to have monies on hand to acquire and develop parkland when opportunities arise and to leverage grant options.

In addition, the City should aim to increase per-resident investment in parks, including maintenance and improvement of existing parks as well as new park development. We propose the addition of an "increased per-resident parks investment" policy in the Open Space Element:

Policy OS-1.15: Park Investment Per Resident. Increase per-resident investment in park maintenance and upgrades in order to ensure equitable access to well-maintained neighborhood parks for all City residents, and increase per-resident investment on new park acquisition and development to a level sufficient to achieve the City's Park Standard of three acres per 1,000 residents (Policy OS-1.3).

Memo to City of Santa Ana Planning Commission
September 15, 2021
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EXHIBIT B

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Re: Comments on Santa Ana General Plan Update DPEIR,
Clearinghouse No. 2020020987

Dear Mr. Carvajal:

On behalf of Rise Up Willowick, I write to provide comments on the proposed Santa Ana General Plan Update (“the Update”) and its accompanying Draft Program Environmental Impact Report (“the DPEIR”). The Update will guide the development of Santa Ana, including the Willowick Golf Course site, for many years, and the California Environmental Quality Act (“CEQA”), Public Resources Code § 21000 et seq., requires that the DPEIR thoroughly assess the Update and its environmental impacts. As set forth in the following comments, we urge the City to (1) continue to designate the Willowick site as open space, (2) provide for more affordable housing under the Update and avoid undermining the Housing Element and the City’s Housing Opportunity Ordinance (the “HOO”), and (3) revise the DPEIR to fully analyze the Update’s environmental impacts, especially those related to displacement and environmental justice.

I. The bulk of the Willowick site should continue to be designated as open space.

The Willowick Golf Course site lies within the West Santa Ana Boulevard Focus Area, one of the focus areas slated for new development under the Update. DPEIR at 4-6. The Willowick site is currently designated as open space, and the Update proposes to maintain that designation. DPEIR at D-6 to D-8. Rise Up Willowick supports this designation until and unless there is a proposal for developing part of the site with affordable housing. The Trust for Public Land, the California Coastal Conservancy, and

Clifford Beers Housing have submitted a proposal to the City of Garden Grove pursuant to the Surplus Land Act, Government Code sections 54220 et seq., to develop the majority of the site into a community park, with affordable housing on the remainder. *See* Willowick Community Park Proposal, attached as Exhibit A. This public green space will further the goals and policies of the General Plan's Open Space Element, which call for the preservation of existing open space areas and the creation of new public parks. DPEIR at 5.15-13, 5.15-14 (Open Space Element, Goals 1-3).

Designation of the majority of the Willowick site as public open space will help meet the growing demand for parks in the City. The Update's proposed increase in residential density in many areas of the City would lead to increased demand for parks and open space. DPEIR at 5.15-15, 5.15-17. The DPEIR projects that the proposed land use changes would result in construction of an estimated 36,261 dwelling units across the City (DPEIR at H-b-5), and a population increase of 96,855 people (DPEIR at 5.15-16). However, park acreage under the Update would increase by only 1.84 acres. *Id.*

Open Space Element Policy 1.3 calls for the City to achieve a minimum park standard of two acres of parkland per 1,000 residents. The City currently does not meet this per-resident standard, and under the Update the shortfall is projected to increase further: the total "parkland deficiency" would increase from 107.56 acres to 299.48 acres at build-out unless additional parks are provided. DPEIR at 5.15-16. The DPEIR calculates that the City currently has 561.94 acres of parkland, but it includes other kinds of open space in this total, such as sports facilities and school recreational facilities. DPEIR at 5.15-10. Although the DPEIR does not fully explain the basis for this parkland calculation, it appears that it may inappropriately count golf courses and cemeteries towards the parkland total. Golf courses, including the Willowick golf course, are classified as "open space." DPEIR at 5.15-10. A golf course, only usable by a small segment of the population and even then for a fee, is not the kind of public space that meets the community's needs. Cemeteries are also classified as "open space," although they are not available for recreational uses. DPEIR at 3-15. Thus, if the DPEIR counts these areas as parkland, the current park deficit is actually greater than the City claims.

Despite the admitted deficit, the DPEIR concludes that the Update will have less than significant impacts related to park demand. DPEIR at 5.15-15 to 5.15-17 (Impact 5.15-1). It reasons that "[p]rovision of parks under implementation of the GPU, which will occur over time, is expected to keep pace with the increase in population growth related to the plan and would not result in a significant impact." *Id.* at 5.15-16. The DPEIR assumes that the City will develop significantly more open space than the 1.84 acres of future parks designated in the Update, funded via in-lieu impact fees collected

from private developers, among other sources. *Id.* However, the DPEIR fails to provide any evidence that funding will be sufficient to reduce the City's parkland deficiency such that impacts would be less than significant. The DPEIR also asserts that the City's park shortage would be reduced by "private parks and recreational facilities owned and maintained by homeowner associations." *Id.* The DPEIR fails to note that many private recreational facilities, like rooftop parks, are not open to the public and will do nothing to improve park access for most of the City, especially lower-income residents. The DPEIR's unsupported conclusions and its failure to identify mitigation measures are invalid under CEQA.

In order to achieve the City's park standard and accommodate the needs of tens of thousands of new City residents, additional park space is urgently needed, and the 102-acre Willowick site can help meet this need. The Willowick Community Park proposal calls for 90 acres to be set aside for public parkland, with the remaining 12 acres to be developed as affordable housing. *See Willowick Community Park Proposal at 17, 30.* In addition to serving growing citywide demand for parks, real recreational open space at the Willowick site will also help meet the existing needs of nearby residents who currently lack adequate access to green spaces in their neighborhoods. There are an estimated 8,500 people living within a 10-minute walk of the Willowick site who currently lack access to a nearby public park. *See Willowick Community Park Proposal at 26.*

Preserving most of the Willowick site as open space will also help to mitigate environmental impacts associated with other aspects of the Update. The DPEIR indicates that the proposed increases in intensity of development and population growth under the Update are projected to generate significant impacts on air quality and greenhouse gas emissions. DPEIR at 1-13, 1-25 (Table 1-4). Urban green spaces improve air quality and mitigate climate change, as trees remove air pollutants and greenhouse gases from the air. *See David J. Nowak and Gordon M. Heisler, National Recreation and Parks Association, Air Quality Effects of Urban Trees and Parks (2010), attached as Exhibit B; Erica Gies, The Trust for Public Land, The Health Benefits of Parks (2006), attached as Exhibit C, at 13.* Thus, maintaining Willowick as green space can mitigate air quality and climate impacts.

Willowick's role in air quality mitigation is especially important because neighborhoods adjacent to the site have high levels of certain air pollutants, including PM

2.5.¹ Urban green spaces like Willowick also help mitigate the urban heat island effect, significantly reducing temperatures in surrounding neighborhoods. *See* The Trust for Public Land, *The Heat Is On* (2020), attached as Exhibit D.

Open space at the Willowick site may also help mitigate impacts on water quality and hydrology resulting from the Update, such as stormwater runoff impacts associated with new development. The DPEIR concludes that the Update's water quality and hydrology impacts would be less than significant and that no mitigation is needed. DPEIR at 5.9-29, 5.9-32. However, this conclusion improperly relies on asserted compliance with applicable state, regional, and local regulatory requirements. DPEIR at 5.9-30 to 5.9-32. Regulatory compliance does not determine the significance of impacts and cannot be used to bypass the City's obligation to analyze and mitigate those impacts. *See Californians for Alternatives to Toxics v. Department of Food & Agriculture* (2005) 136 Cal.App.4th 1, 15-17; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-09.

II. The Update does not provide for sufficient affordable housing and would undermine the City's Housing Opportunity Ordinance.

Santa Ana faces a growing shortage of affordable housing, especially of deeply affordable units. Since 2014, the City's below market rate housing construction has been heavily skewed towards above-moderate income units, which have far outnumbered production of low and very-low income units. City of Santa Ana, Request for Council Action: General Plan Housing Element Annual Progress Report (March 17, 2020), attached as Exhibit E, at 3. The City's estimated Regional Housing Needs Assessment allocation for the 2021-2029 planning period is 3,086 housing units, including 360 low-income and 583 very-low-income units. DPEIR at 5-13-13; Southern California Association of Governments, Precertified Local Housing Data for the City of Santa Ana (August 2020), attached as Exhibit F, at 18. The DPEIR acknowledges that the Update "would directly induce substantial unplanned population growth" as well as employment growth, a significant impact which would further increase housing demand. DPEIR at 5.13-12 to 5.13-14 (Impact 5.13-1). The Willowick Community Park Proposal would help to address the City's affordable housing shortage, as it calls for 12 acres of the

¹ Several census tracts adjacent to or near the Willowick site are designated as disadvantaged communities that experience a high pollution burden, including high concentrations of PM 2.5 and high occurrences of asthma and cardiovascular diseases. *See* CalEnviroScreen 3.0, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>.

Willowick site to be developed into approximately 270 affordable housing units. *See* Willowick Community Park Proposal at 30.

The Willowick development by itself would not be sufficient to meet the City's affordable housing needs—the Update must provide for increased affordable housing development citywide. However, the Update fails to provide for sufficient housing at the affordability levels the City needs, and its upzonings would instead undermine the effectiveness of the city's Housing Opportunity Ordinance. The Update would increase residential density limits in many areas of Santa Ana. It would modify land use designations in five Focus Areas (South Main Street Focus Area, Grand Avenue & 17th Street, West Santa Ana Boulevard, 55 Freeway & Dyer Road, and South Bristol Street), re-designating portions of those areas for more intensive development and increasing the allowable dwellings per acre and floor-area ratio for residential construction in those areas. DPEIR at 1-6, 1-7, H-a-7. The Update would also add a “Corridor Residential” land use designation, which would allow higher density residential development in additional areas. DPEIR at 3-52. These upzonings will facilitate increased housing construction, but would also undermine the HOO's inclusionary housing requirements.

The HOO requires developers to construct affordable units or pay a fee when the number of residential units in a new development exceeds the density permitted by applicable zoning. Santa Ana Muni. Code § 41-1902. Development projects are not subject to the HOO's inclusionary requirements if they do not exceed established density limits under the zoning for the site. *Id.*

Because the Update would increase density limits in many areas of the City and allow more by-right development, fewer developments will need to seek City approval for additional density. In many, if not most, cases the HOO's inclusionary requirements will be triggered less often. As a result, the HOO will apply to fewer projects. Developers will build fewer affordable units and pay less into the City's inclusionary housing fund. By reducing the effectiveness of the HOO, the Update would also undermine General Plan Housing Element Policy 2.6, which provides that “pursuant to the Housing Opportunity Ordinance,” the City must “require eligible rental and ownership housing projects to include at least 15 percent of the housing units as affordable for lower and moderate-income households.” DPEIR at 5.10-17.

The Update will thus create an internal inconsistency within the General Plan, as the increased by-right densities will impede achievement of the Housing Element's goal. To avoid this illegal inconsistency, the City must, within or simultaneous with the Update, revise the HOO to ensure sufficient affordable housing production. Gov. Code §

65300.5 (requiring “internally consistent” General Plan); *Sierra Club v. Kern County Board of Supervisors* (1981) 126 Cal.App.3d 698, 704. Such revisions could provide that the HOO continues to apply to projects above the pre-Update density, even if that density is allowed by right under the Update. Alternatively, the City could increase the ordinance’s inclusionary requirements, so that sufficient affordable housing is built even if the HOO applies to fewer projects.

The Update’s upzoning and its obstruction of the HOO will combine to displace present community members. Much of the housing development in the upzoned areas is likely to consist of market-rate housing unaffordable to lower-income residents. This is likely to increase prices of existing lower-cost housing in the surrounding neighborhoods. Rising rents and costs of living will displace people, potentially necessitating housing construction elsewhere. As the DPEIR acknowledges, such construction is potentially a significant environmental impact under CEQA. DPEIR at 5.13-10; 14 Cal. Code Regs. Appendix G, § XIV(b).

The DPEIR, however, reasons that the proposed Update “would provide more housing opportunities than currently exist” and concludes that “implementation of the [Update] would not displace people and/or housing,” leading to “no impact.” DPEIR at 5.13-14 (Impact 5.13-2). This analysis fails to take any account of the mismatch between the affordability of housing under the Update and the means of the City’s present residents. The DPEIR must reconsider its analysis of these impacts in light of the Update’s failure to provide sufficient affordable housing.

III. The DPEIR does not sufficiently analyze the Update’s environmental justice impacts.

The DPEIR also fails to adequately consider the Update’s environmental justice impacts. S.B. 1000 requires local governments to include an environmental justice element in their general plan (or integrate environmental justice goals and policies into other elements). Gov. Code § 65302(h). This discussion must identify “disadvantaged communities” in the jurisdiction and identify ways to reduce health risks and other impacts on those communities, as well as improvements and programs that address their needs. *Id.* Government Code section 65302(h)(1)(A) requires general plans to “[i]dentify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure, including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity.” The Update does not include a stand-alone environmental justice element, instead asserting that environmental justice

issues will be incorporated throughout the Update. DPEIR at 3-17. The Update includes several draft goals and policies which refer to equity and environmental justice (*See* DPEIR at B-a-2, B-a-5, B-a-19, B-a-20, B-a-25, B-a-39, B-a-41, B-a-43, B-a-44).

Despite the Update's inclusion of these policies, the DPEIR makes no attempt to analyze the Update's environmental justice impacts on disadvantaged communities. CEQA requires an evaluation of the Update's significant environmental effects and consistency with applicable General Plan policies. 14 Cal. Code Regs §§15126.2(a), 15125(d). The Update includes goals and policies that seek to promote environmental justice by addressing air pollution, hazardous waste exposure, and other impacts on disadvantaged communities. *See, e.g.*, DPEIR at B-a-25 (Policy CN-1.5; air pollution and environmental justice), B-a-39 (Policy S-2.6; hazardous materials and environmental justice), B-a-43 (Policy LU-3.9; polluting land uses and environmental justice). The DPEIR should consider whether other aspects of the Update would have significant environmental impacts on disadvantaged communities,² and whether those elements would impede the Update's environmental justice goals and policies, creating an internal inconsistency within the General Plan. *See* Gov. Code § 65300.5 (requiring "internally consistent" General Plan); *Sierra Club v. Kern County Board of Supervisors* (1981) 126 Cal.App.3d 698, 704. The DPEIR should comprehensively analyze environmental justice impacts, including air quality and pollution exposure in disadvantaged communities as well as access to public facilities such as parks and access to healthy food.

As part of its environmental justice analysis, the DPEIR should consider whether the Update may result in conflicts between industrial or commercial uses and proposed housing in corridors that the Update has designated for upzoning. It should particularly analyze any resulting impacts on disadvantaged communities. For example, air pollutant emissions from light industrial uses may affect air quality in the areas designated for increased residential density, potentially increasing residents' exposure to air pollution. Notably, four of the five "focus areas" designated for residential upzoning under the Update also include land designated for industrial uses. DPEIR at 1-6. This would potentially cause an disproportionate adverse impact on disadvantaged communities. Moreover, the effect of the Update policies promoting such development would cause harms contrary to Update policies on environmental justice- an internal inconsistency.

² The CEQA guidelines make clear that "economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment" and that "[i]f the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant." 14 Cal. Code Regs. § 15064(e); *see also id.* §15382.

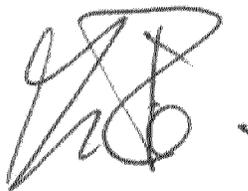
Similarly, the Update proposes a new “Industrial/Flex” land use designation in these areas, which will promote “large-scale office industrial flex spaces, multi-level corporate offices, and research and development uses.” DPEIR at 3-18. The DPEIR must consider the potential impacts of these newly-designated industrial areas on existing residents in nearby housing.

IV. Conclusion

As currently proposed, the Update does not provide for sufficient open space or affordable housing, and would undermine the City’s Housing Opportunity Ordinance. As set forth above, Rise Up Willowick urges the City to (1) continue to designate the Willowick site as open space until and unless there is a proposal for developing part of it with affordable housing, (2) provide for more affordable housing in order to avoid undermining the HOO and causing an internal inconsistency within the General Plan, and (3) revise the DPEIR to fully analyze the Update’s impacts on displacement and environmental justice. Rise Up Willowick respectfully requests that the City revise the Update to address these issues, revise the DPEIR, and recirculate both for public comment.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Gabriel M.B. Ross

List of Exhibits:

Exhibit A: Trust for Public Land, Coastal Conservancy, and Clifford Beers Housing, Willowick Community Park Proposal (August 2020)

Exhibit B: David J. Nowak and Gordon M. Heisler, National Recreation and Parks Association, Air Quality Effects of Urban Trees and Parks (2010)

Verny Carvajal
October 6, 2020
Page 9

Exhibit C: Erica Gies, The Trust for Public Land, The Health Benefits of Parks (2006)

Exhibit D: The Trust for Public Land, The Heat Is On (2020)

Exhibit E: City of Santa Ana, Request for Council Action: General Plan Housing Element Annual Progress Report (March 17, 2020)

Exhibit F: Southern California Association of Governments, Precertified Local Housing Data for the City of Santa Ana (August 2020)

1286679.21

EXHIBIT C

SHUTE, MIHALY
& WEINBERGER LLP

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GABRIEL M.B. ROSS
Attorney
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November 9, 2020

Via Email

City of Santa Ana Planning Commission
20 Civic Center Plaza
Santa Ana, CA 92701
c/o Commission Secretary Sarah Bernal
SBernal@santa-ana.org.

Re: Santa Ana General Plan Update EIR, Clearinghouse No. 2020020987

Dear Chair McLoughlin and Commissioners:

On behalf of Rise Up Willowick, I write to comment on the proposed Santa Ana General Plan Update (“the Update”) and its accompanying Environmental Impact Report (“EIR”).

In the Final EIR the City has proposed changes and additions to the Update’s Open Space Element that seek to create new parkland and avoid loss of parkland. We commend the City for including these measures in response to feedback received on the Draft EIR. However, these General Plan measures are insufficient: they do not fully explain how increased creation of parkland will work, and are ambiguous as to what lands are included in a proposed prohibition on net loss of parkland. Moreover, the Open Space Element calls for several Municipal Code amendments to put these General Plan polices into effect, but would defer them until 2022. This will create a period of uncertainty until the measures are fully implemented. We urge the City to revise the Open Space Element to clarify these ambiguities, and to defer the Update so that it can be adopted concurrently with these code amendments. Moreover, the City should defer the Update so that it can be aligned with the City’s new Housing Element and code amendments to strengthen the City’s Housing Opportunity Ordinance (HOO).

The revised Open Space Element Policy 1.3 indicates that the City should “prioritize the creation and dedication of new public parkland over the collection of impact fees” for new residential development in Focus Areas. Rise Up Willowick

supports the prioritization of parkland dedication over parkland impact fee collection. However, the Open Space Element does not fully explain how prioritization would occur for projects of fewer than 100 residential units. Implementation Action OS-1.16 indicates that the City should “[d]evelop an incentives program that encourages private development and public agencies to provide park and recreation facilities beyond the minimum requirements.” Rise Up Willowick supports the creation of such incentives. However, the Open Space Element does not explain how the incentives program might operate or provide criteria to guide its implementation. The Open Space Element should be revised to further clarify these measures.

Implementation Action OS-1.6 calls for the City to “[e]stablish land use provisions in the Municipal Code that prevent a net loss of parkland in the city” and “[r]equire at least a 1:1 replacement if there is any loss of public parkland due to development.” We support the City’s adoption of a “no net loss of parkland” requirement in the Municipal Code. However, we urge the City to clearly define what constitutes “parkland” for purposes of this requirement. The “no net loss of parkland” requirement should not impede the redevelopment of golf courses to include a mix of public parkland and affordable housing. As outlined in our October 6 letter to the City, The Trust for Public Land, the California Coastal Conservancy, and Clifford Beers Housing have submitted a proposal to the City of Garden Grove to develop most of the Willowick Golf Course site into a public park and to construct affordable housing on the remainder. The “no net loss of parkland” policy should not create barriers to projects such as the Willowick proposal that would create affordable housing and other community benefits in addition to public parkland.

Implementation Action OS-1.15¹ calls for the City to “[a]mend the Residential Development Fee in the Municipal Code (Chapter 35, Article IV) to reflect requirements for Larger Residential Projects (100+ units, residential only or mixed-use) to provide two acres of new public parkland concurrent with the completion of and within a 10-minute walking radius of the new residential project.” It also calls for the City to work with “new development projects within the Focus Areas” to encourage developers to provide more parkland than the Code requires. Similarly, Implementation Action OS-1.8 calls for the City to update the Acquisition and Development Ordinance to increase dedication and fee requirements and ensure that parkland is acquired near projects creating demand. Rise Up Willowick supports these changes, and urges the City to ensure

¹ The City’s responses to comments in the Final EIR label this action as OS-1.14, but the Open Space Element of the revised Update identifies this action as OS-1.15.

their effectiveness by applying these parkland dedication requirements to all new market-rate projects, including those smaller than 100 units.

Most importantly, we urge the City to take up these Code revisions now. Implementation Actions OS-1.6 and OS-1.15 both defer the amendments until 2022, two years after the City's planned Update adoption. By deferring implementation for two years, the City would create an extended period of legal uncertainty for developers, City residents and other stakeholders. During this period, the "no net loss of parkland" and expanded parkland dedication requirements for large developments would constitute City policy but would not yet be reflected in the Municipal Code. Projects will need to be consistent with the General Plan policies, but without Code revisions, developers will not know how to comply.

The General Plan serves as a "constitution" for the regulation of future development in the City. *DeVita v County of Napa* (1995) 9 Cal.4th 763, 772. The City's land use regulations must be consistent with the General Plan. *Leshner Communications, Inc. v City of Walnut Creek* (1990) 52 Cal.3d 531, 544. To avoid an extended period of inconsistency between the General Plan and the Code and the resultant uncertainty, the City should adopt the Update concurrently with the Municipal Code amendments implementing Actions OS-1.6 and OS-1.15. The City should not take action on the Update until those code amendments are also ready for adoption.

By adopting the Update on a rushed timeline, the City also risks creating unintended consequences inconsistent with the City's affordable housing goals. In our October 6, 2020 letter to the City, which is hereby incorporated by reference, we urged the City to provide for more affordable housing under the Update and avoid undermining the Housing Element and the City's HOO. As we explained in that letter, the Update would cause substantial population growth, but fails to provide for sufficient deeply affordable housing, increasing the risk of displacement. Moreover, the Update's upzonings would reduce the HOO's effectiveness because the HOO's inclusionary requirements would apply to fewer projects. The Update would therefore impede General Plan Housing Element Policy 2.6, which calls for the inclusion of affordable units in new residential developments via the HOO. The City should avoid this inconsistency by deferring the Update until next year so that it can be adopted concurrently with the City's new Housing Element, and should simultaneously amend the HOO to ensure sufficient affordable housing production, as discussed in our October 6 letter.

In closing, we urge the City to revise the Update to (1) further elaborate on how the City proposes to incentivize increased creation of new parkland, (2) clarify what open spaces are covered by the “no net loss of parkland” policy, (3) extend the enhanced parkland dedication requirements to new market-rate residential developments smaller than 100 units, and (4) postpone the Update until it can be adopted concurrently with the corresponding changes to the Municipal Code and aligned with the City’s new Housing Element. The Planning Commission should not recommend adoption of the Update until these issues have been addressed.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Gabriel M.B. Ross

cc: General Plan Email: newgeneralplan@santa-ana.org
Public Comment Email: ecomments@santa-ana.org
Planning Dept. Director Minh Tai: mthai@santa-ana.org
Principal Planner Verny Carvajal: vcarvajal@santa-ana.org
Planning Commissioners: vphan@santa-ana.org; mmcloughlin@santa-ana.org;
ngarcia10@santa-ana.org; knguyen20@santa-ana.org; frivera@santa-ana.org;
ccontreras-leo@santa-ana.org; [no email available for Commissioner Thomas
Morrissey]



December 7, 2021

Via Email

Santa Ana City Council
20 Civic Center Plaza
Santa Ana, CA 92701

Re: Santa Ana General Plan Update Open Space Element

Dear Mayor Sarmiento and Councilmembers Phan, Penaloza, Lopez, Bacerra, Hernandez, and Mendoza,

The Rise Up Willowick Coalition (“the Coalition”) is comprised of residents from the City of Santa Ana, the City of Garden Grove (“the City”), and neighboring Orange County Cities as well as local organizations who want to ensure that the Willowick Golf Course property (“Willowick”) is developed to meet the needs of current and future local residents and their vision of publicly accessible parkland, deep affordable housing, and community spaces.

As the City Council considers adopting the draft General Plan Update (“the General Plan”) today, the Coalition would like to make clear that it opposes the adoption of the Plan as it is proposed today. The reason being that the General Plan does not propose policies and programs that will effectively address the environmental justice (“EJ”) concerns Santa Ana residents and community groups have continuously raised for the past two years. For example, while the City proposes to keep the zoning of Willowick as open space, it does not adequately address how it plans to meet its current and projected park deficit.

The City’s Parkland Deficit

One of these environmental concerns the City does not properly address is the deep parkland deficit in Santa Ana. The City’s Municipal Code states that the City’s parkland standard is a ratio of 2 acres of parkland per every 1,000 residents. The City has not met that standard. It currently has a parkland deficit of 154.44 acres, which means that for every 1,000 residents there are only 1.54 acres of parkland.¹ In the City’s Recirculated Draft Program Environmental Impact Report for the General Plan, that deficit is projected to increase to 346.41 acres by the year 2045 based on the development and population increases the City anticipates the Plan’s proposed policies will facilitate, or to 1.20 acres per every 1,000 residents.²

On October 6, 2021, RUW sent a letter (“the October 6th letter”) to Mayor Sarmiento, City Council Members, Planning Commissioners, Planning Director Minh Tai, and Principal Planner Melanie McCann that stated that the Open Space policies the City was proposing to address the parkland deficit would not be effective. In that letter, the Coalition provided recommendations on

¹ Final Recirculated Draft Program Environmental Impact Report, Table 5.15 4, October, 2021, p. 5.15-28, https://www.santa-ana.org/sites/default/files/pb/general-plan/NovPEIR2021/Volume%202/Ch_05-15_REC.pdf.

² Ibid.

how the City could effectively increase parkland including raising its parkland standard to 3 acres per 1,000 residents, which is recommended for a City the size of Santa Ana, and a No-Net-Loss of Open Space Policy that would ensure that any open space land lost to development that is not 100% affordable, would be replaced at a 1-to-1 ratio. The October 6th letter is included with this letter. One important thing to note is that the October 6th letter provides an inaccurate figure for the City's current and projected parkland deficit. The City revised the City's current and projected parkland deficit figures after the letter was sent.

The October 6th letter also provided policy language for a No-Net-Loss of Open Space Policy ("the Policy") that would not only help preserve the City's existing parkland, but actually create more parkland through the preservation and repurposing of the City's current open space land. By the City's own admission at the Planning Commission meetings on September 13, 2021 and November 8, 2021, the City's parkland is so acute that it feels there is no way of increasing the supply of parkland to a proper level. This is true if the City only uses its existing parkland to address its parkland deficit as the City currently proposes to do in the General Plan. However, the Policy language the Coalition provided proposes that open space, not just parkland, is preserved so that it can be repurposed as publicly accessible parkland. This open space land includes properties like the Willowick Golf Course. The Policy the Coalition proposes is a viable solution for addressing the City's park deficit.

Other Environmental Justice Concerns

In addition to concerns over the General Plan not addressing the City's current and future parkland deficit, the Coalition would also like to acknowledge that there are other EJ issues the City's General Plan does not adequately address. Community groups like Orange County Environmental Justice, Madison Park Neighborhood Association, Santa Ana Active Transportation, the Kennedy Commission, and Thrive Santa Ana have raised concerns over the fact that the General Plan policies will not solve issues over air quality, lead contamination of soil, mobility, and the intensification of development in the City's proposed 5 Focus Areas that will likely facilitate the displacement of current residents. The City claims it has done extensive community outreach over the last year. While there were multiple EJ forums and an EJ survey where residents and community groups raised the concerns mentioned in this letter, the City's General Plan does not fully, or even majorly, address them. The Coalition believes that true community engagement is not just about how many opportunities for community input the City hosts, but a true effort to address the input residents provide.

For all the reasons stated in this letter we ask that the Council not adopt the General Plan being proposed tonight and instead direct Staff to work with residents and community groups to develop policies that actually address community needs, including the No-Net-Loss of Open Space Policy.

Please contact Cynthia Guerra at cguerra@riseupwillowick.org if you have any questions.

Sincerely,

The Rise Up Willowick Coalition

Orozco, Norma

From: Rica Garcia <Rica.Garcia@doj.ca.gov>
Sent: Tuesday, December 07, 2021 3:26 PM
To: eComment
Subject: Comments Submission - Santa Ana General Plan Update

To whom it may concern:

Our Office has been monitoring and evaluating the City's General Plan Update for compliance with Senate Bill 1000 ("SB 1000"), which requires the City to adopt an environmental justice element or policies as part of the General Plan Update. SB 1000 intends to make environmental justice a real and vital part of the planning process by encouraging transparency and equitable participation during all stages of a general plan update.

During the Nov. 8, 2021 Planning Commission Meeting, a majority of the community members expressed that the City failed to engage and adequately address key environmental justice issues. In order to accomplish equitable participation, we recommend the City address such concerns before moving forward with adoption.

Further, given the magnitude of the soil lead contamination issue in Santa Ana and the impacts on environmental justice communities, we wanted to follow-up on the City's General Plan policies related to lead contamination. In particular, LU-3.29 focuses on evaluating soil hazard conditions and remediation in new development projects. However, it does not include evaluation or remediation in existing residential areas. How does the City plan to address soil lead contamination in existing residential areas?

Moreover, as part of LU-3.29, will the City implement measures in the development review process that would require evaluation and remediation of soil hazard conditions on property adjacent to sites with hazardous soil lead levels?

Thank you,

Rica V. Garcia
Deputy Attorney General
Bureau of Environmental Justice
California Attorney General's Office
1515 Clay Street, 20th Floor
Oakland, CA 94612
Tel. (cell): 408-398-4278

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KATRINA A. TOMAS
Attorney
ktomas@smwlaw.com

December 7, 2021

Via Electronic Mail Only

Santa Ana City Council
c/o Daisy Gomez
Clerk of the Council
20 Civic Center Plaza M-30
Santa Ana, CA 92701
ecomment@santa-ana.org

Re: Santa Ana General Plan Update

Dear Mayor Sarmiento and Council Members:

On behalf of Orange County Environmental Justice (“OCEJ”), I write to provide comments on the Santa Ana General Plan Update and its accompanying Final Recirculated Program Environmental Impact Report (“FEIR”). Shute, Mihaly & Weinberger, LLP previously submitted comments on behalf of OCEJ on the Recirculated Draft Program Environmental Impact Report (“RDPEIR”) in a September 20, 2021 letter to the Planning Commission. Unfortunately, the City has not adequately addressed the various issues noted in these previous comments. As a result, the General Plan Update as written and its accompanying FEIR remain flawed.

I. The City Failed to Investigate Environmental Justice Concerns.

At the heart of the issues plaguing the General Plan Update and its FEIR, is the City’s rushed approval process that has continuously neglected community concerns and input. The California Environmental Quality Act (“CEQA”), Public Resources Code section 2100 et seq.,¹ requires a thorough evaluation of the General Plan Update’s environmental impacts. This includes impacts to environmental justice communities as a result of soil lead contamination. The FEIR’s meagre attempts at an investigation through the environmental justice community engagement survey (“community survey”) fails to

¹ Undesignated statutory references are to the Public Resources Code. References to the “CEQA Guidelines” are to title 14, Cal. Code of Regulations, section 15000 et seq.

meet CEQA's standards.

Throughout the environmental review process the City has received numerous comments from OCEJ and other community stakeholders decrying the lack of focused environmental assessment in disadvantaged communities despite the evidence of pollutant concentrations, including lead-contaminated soils, in those communities. Moreover, across several roundtable discussions, OCEJ repeatedly expressed concern about the draft community survey's inadequate design. OCEJ observed that most of the lead contamination-related questions assumed that the main source of lead contamination was lead-based paint and neglected other sources, such as historical emissions from combustion of leaded gasoline. This mischaracterized sources of lead contamination in Santa Ana. Furthermore, the survey's design forced residents to choose between environmental justice priorities, rather than allowing residents to highlight all of the issues concerning their communities. None of these issues were rectified in the final version of the survey.

The community survey also failed to ensure adequate participation. Out of Santa Ana's 332,318 residents, only 746 completed the survey. RDPEIR at 2-23. This amounts to merely 0.2 percent of the total population. Clearly, the City's outreach methods were flawed. Indeed, by the City's own accounts, only 12 percent of residents received a flyer encouraging participation in the community survey. *See* RDPEIR at 2-23. Additional volunteer efforts distributed just 1,400 hard copy surveys. Accordingly, the community survey cannot constitute an accurate assessment of the City's environmental justice needs.

In the FEIR's response to comments, the City entirely fails to address these issues. In fact, the City neither provides any explanation for its poorly designed community survey nor addresses its ineffective community outreach. As a result, the City threatens to violate CEQA.

The CEQA Guidelines acknowledge that "an agency must use its best efforts to find out and disclose all that it reasonably can." Guidelines § 15144. The Guidelines also require agencies to engage in a "thorough investigation" of a particular impact. Guidelines § 15145. To fulfill CEQA's informational purpose, an agency must make "a good faith effort at full disclosure." Guidelines § 15151. In particular, the City "should not be allowed to hide behind its own failure to gather relevant data." *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311. The community survey, which captures merely 0.2 percent of the City's total population, does not meet CEQA's disclosure and investigation requirements. A more thorough community engagement process is needed to better inform the update to the City's General Plan.

OCEJ urges the City Council to delay adoption of the General Plan Update and the FEIR until the City can implement an adequate community survey that will adequately capture concerns from the wider Santa Ana community.

II. The General Plan Update's Environmental Justice Policies Addressing Lead Contamination Are Inadequate.

The inadequate community survey led to a flawed, narrow framing of proposed General Plan policies. Had the City properly engaged in a thorough community survey, the results of the soil-lead contamination assessment would have provided additional support for the policies community stakeholders like OCEJ, Thrive Santa Ana, and Rise Up Willowick continue to propose to the City.

Moreover, the General Plan Update's lead contamination policies do not satisfy the spirit of Senate Bill 1000 ("SB 1000"), which requires incorporating environmental justice policies into a General Plan Update and ensuring these policies adequately address health risks to environmental justice communities. Gov. Code § 65302(h)(1)(A). While the City has complied with the former requirement, it has not yet satisfied the latter. As the California Department of Justice ("DOJ") previously noted in its own comment letters, the City's lackluster policies do not match the severity of the lead contamination burdens and unique needs of the disadvantaged communities in its jurisdiction as SB 1000 requires. Gov. Code § 65302(h)(1)(C). DOJ also agrees that the City must do more to incorporate community input.

OCEJ reiterates the following concerns:

First, the General Plan Update does not include any provisions that require, or even encourage, the City to engage in testing soils in residential neighborhoods for lead contamination. Additionally, there is no clear process or agreed upon safety thresholds for identifying lead-contaminated properties.

Second, proposed soil-lead contamination policies only provide superficial commitment of City resources. Comprehensively remediating soil-lead contamination and lead toxicity will require an ongoing effort over several years. Yet, proposed solutions for remediating soil-lead contamination and to increase access to blood testing for Santa Ana residents are set to expire in 2022. *See* RPDEIR Appendix B-a at 4-6, 63. Effectively addressing lead contamination in Santa Ana will require more than just one year of work, partnerships, and commitment.

Finally, the City continues to ignore OCEJ's healthcare policy recommendations that will best serve Santa Ana's environmental justice communities.

While the General Plan Update provides some policies aimed at expanding access to affordable healthcare, uninsured residents impacted by lead contamination continue to be left without recourse. *See, e.g.*, RDPEIR Appendix B-a at 3. This is particularly troubling in Santa Ana, where a large proportion of City residents are barred from accessing Medi-Cal insurance due to their immigration status.

III. Conclusion

As described above, the FEIR fails to thoroughly assess and analyze environmental justice concerns. This flawed analysis has resulted in General Plan Update policies that are not responsive to community concerns and undermine the spirit of SB 1000. OCEJ urges the City to (1) delay approval of the General Plan Update and certification of its accompanying FEIR, (2) revise the community survey and work with community groups to more broadly disseminate the survey to impacted residents, and (3) participate in an additional series of roundtable discussions with impacted residents and community groups to accurately capture community approval of current General Plan policy language and incorporate any pending resident concerns. OCEJ respectfully requests that the City revise the FEIR to address these environmental justice issues and recirculate the document for public comment.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Katrina A. Tomas

cc: Patricia J. Flores Yrarrázaval, OCEJ
Keila Villegas, OCEJ
Shahir Masri, UCI Public Health
Jun Wu, UCI Public Health
Juan Manuel Rubio, University of California Irvine
Alana LeBrón, University of California Irvine
Abigail Reyes, Community Resilience, University of California Irvine
Gregory Lopez, Community Resilience, University of California Irvine
Danielle Stevenson, University of California Riverside
Lisa Rudloff, Santa Ana Parks, Recreation and Community Services

Dec 11, 2021

Dear Mayor, City Council and Staff,

I am writing to urge you to wait until we can complete a Historical Survey on South Main before adopting the new General Plan. Without a Historical Survey, we can't identify the antique structures which give South Main Street much of its charm.

Way back this past Spring, in April or May, staff from Planning contacted myself and fellow neighborhood leader Ginelle Hardey to ask that we stop plans on conducting a community-led historical survey because the City was going to contract a consultant to research all the buildings on the South Main Corridor. We have the largest concentration of Streamline Modern, Googie, Craftsman and other regional forms of architecture in the whole county right on South Main Street dating back to it's time as a part of historic Route 101, a sister highway to Route 66.

At the November 4 Historical Resources Commission meeting, Ginelle and I asked the status of this Historical Survey and staff could not provide an answer.

If no Consultant has been contracted or if the Survey can not be completed, I ask that the City partner with existing South Main Neighborhood Alliance, a coalition of South Main residents, neighborhood leaders and businesses to complete this important endeavor.

Approving a General Plan that does not protect our important historical structures will ensure their destruction as development rushes forward on this important corridor.

As a guide to the kind of partnership that would be ideal, I ask you to review the City of San Antonio's proposed Historic Buena Vista District which includes a video presentation and multi-lingual flyer campaign for local residents:

<https://www.sanantonio.gov/historic/scoutsa/HistoricDistricts/BuenaVista>

Looking forward to working together to preserve our historic heritage!

Sincerely,

--- Sandra Pena Sarmiento

Pacific Park / Eastside Neighborhood Leader

cc Ginelle Hardey, Henninger Park Neighborhood Leader

Irma Jauregui, South Main Neighborhood Alliance

Orozco, Norma

From: Jose Rea <josejrea@gmail.com>
Sent: Tuesday, December 07, 2021 12:21 PM
To: eComment
Cc: eComment; Bacerra, Phil; Lopez, Jessie; Mendoza, Nelida; Penaloza, David; Phan, Thai; Ridge, Kristine; Sarmiento, Vicente; Hernandez, Johnathan; Carvalho, Sonia R.; Adolfo Sierra; Leonel Flores; Jabari Brown (clinic)
Subject: City of Santa Ana General Plan

December 7, 2021

Santa Ana City Council, City Manager and City Attorney

Re: General Plan Update

Last year the Planning Commission delayed the approval of the City of Santa Ana General Plan due to the insufficient and late efforts by the Building & Planning Agency to outreach and include environmentally impacted communities in the process of developing the new plan as required by SB 1000. While the city started the GPU review process in 2015, SB 1000 as a new law was implemented in 2018. The advocacy efforts by the residents and community organizations resulted in the 2020 delay of the GPU before its adoption by the previous city council.

As a voting resident of the city, I hope the current city council would be more receptive to address the serious public health risks we are exposed to by polluting industries in the Madison Park Neighborhood and surrounding communities, 21 neighborhoods across 17 census tracts are considered Environmental Justice Communities in Santa Ana according the CalEPA. I called them ENVIRONMENTAL INJUSTICE COMMUNITIES.

This is your opportunity to place the health of the residents you represent and who elected you as your top priority, the way it should always be, above business and industry interests. Do not approve the current version of the GPU, a one-year delay was not sufficient time and effort on the part of the city to educate and significantly include the communities most impacted by environmental injustice. The GPU blueprint will stay as the policy to follow for decades to come. It is your duty to improve the health outcomes of the current population as well as the next generations.

Allow more time to continue to outreach to EJ communities, review and improve the current draft.

Jose Rea
Madison Park Neighborhood

UCI School of Social Sciences

Department of Anthropology

3151 Social Science Plaza
Irvine, CA 92697-5100
(949) 824-1207
<https://www.anthropology.uci.edu>

December 7, 2021

Re: Environmental Justice in Santa Ana's General Plan Update

Dear Mayor Sarmiento and Santa Ana City Council,

Thank you for the opportunity to comment on the City of Santa Ana's Draft General Plan Update. I am a PhD Candidate at the University of California Irvine specializing in environmental justice policy issues in Southern California, and my dissertation research focuses on SB 1000 implementation in Santa Ana. I have had the pleasure of working closely as a research collaborator with community organizations in Santa Ana since 2014, most recently with MPNA-GREEN's community air monitoring initiative.

I am writing to express my serious concerns with the Draft General Plan Update and to urge the City Council not to adopt the GPU at today's City Council meeting. As a blueprint for the next several years of the City's development, this document should ensure inclusiveness, transparency, and accountability.

- 1. It is antithetical to the environmental justice principles to approve the General Plan Update in a meeting that is not accessible to all Santa Ana residents.** Robust, inclusive, and equitable community engagement is the cornerstone of environmental justice. While the City has made important strides in improving community outreach about EJ in the General Plan since last fall, when the state Department of Justice endorsed a delay in the planning process, the current General Plan falls short of reflecting the voices and interests of the city's 17 disadvantaged communities. For one immediate and crucial example, remote participation in city meetings by Zoom and phone is no longer available to residents, despite ample evidence throughout the pandemic that these options are both feasible and essential for community engagement.
- 2. The General Plan Update should establish procedures and expectations for transparency and accountability regarding historical, ongoing, and future environmental hazards impacting Santa Ana's disadvantaged communities.** In the course of my work with MPNA-GREEN and UCI researchers, we have encountered a serious lack of transparency about industrial permits and permit violations. MPNA-GREEN and numerous community leaders have recommended several measures to ensure transparency and accountability, including:
 - a. Collection and publication of baseline data on emitters, emissions, and concentrations for each disadvantaged community,
 - b. Specific, goal-oriented remediation plans for each disadvantaged community

- c. Public access to comprehensive and up-to-date emissions reports from all facilities requiring permits from air quality, water quality, and toxic substances control boards,
- d. Establishing a city Office of Environmental Justice to oversee emitters' compliance with existing environmental regulations, coordinate among environmental agencies and other stakeholders, and track and respond to community input, and
- e. Publishing monthly reports on permit violations, permit requests, pending cleanups, code violation enforcement, and city compliance with environmental standards in each of the city's disadvantaged communities.

In asking you to delay the approval of the current General Plan Update, I would be remiss if I did not thank each of you for your commitment to supporting environmental equity and community engagement in the planning process thus far. As one of the first municipalities in California to implement SB 1000 in its General Plan Update, Santa Ana is at the vanguard of developing, community-led solutions to environmental justice issues across the state. The City has the opportunity to set a new standard for local, participatory environmental justice policy. Please heed the voices of the community leaders and residents most impacted by toxic pollution, social vulnerability, and political marginalization: do not pass this General Plan Update without incorporating their concerns.

Sincerely,



Kathryn Cox, MA
 PhD Candidate in Anthropology, University of California Irvine
 National Science Foundation Graduate Fellow
 Haynes Foundation Graduate Fellow
 UCI Newkirk Center Environmental Justice Fellow

cc: Adolfo Sierra, President, Madison Park Neighborhood Association
 José Rea, Treasurer, Madison Park Neighborhood Association
 Leonel Flores, GREEN Community Organizer, Madison Park Neighborhood Association
 Jabari Brown, Myson Foundation Clinical Fellow, UCI Environmental Law Clinic
 Vicente Sarmiento, Mayor, City of Santa Ana
 Thai Viet Phan, Ward 1 Councilmember, City of Santa Ana
 David Penalosa, Ward 2 Councilmember, City of Santa Ana
 Jesse Lopez, Ward 3 Councilmember, City of Santa Ana
 Phil Bacerra, Ward 4 Councilmember, City of Santa Ana
 Johnathan Ryan Hernandez, Ward 5 Councilmember, City of Santa Ana
 Nelida Mendoza, Ward 6 Councilmember, City of Santa Ana
 Kristine Ridge, City Manager, City of Santa Ana
 Sonia Carvalho, City Attorney, City of Santa Ana

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December 7, 2021

Re: Environmental Justice in Santa Ana's General Plan Update

To Whom It May Concern,

Thank you for the opportunity to comment on the City of Santa Ana's Draft General Plan Update. I am Mike Fortun, a historian and anthropologist of science and professor at University of California Irvine (UCI). I specialize in the study of how science is used in governance, helping highlight best practices. I write to encourage the City of Ana to adopt best practices for using science in governance in updating the city's General Plan.

The timing of the city's work to update its General Plan is especially ripe given rising expectations across the country and California that environmental injustice be proactively addressed at the local level. The time is also ripe because of the expanse of scientific research now underway in Santa Ana, many through partnerships with UCI. I am part of a large, interdisciplinary science team from UCI recently awarded a California Department of Justice Grant to study air pollution in Santa Ana, for example. Results from UCI research in Santa Ana will continue to be available in coming years. The General Plan needs to include explicit plans to use these research findings in their continuing planning and programming.

Developing capacity for best-practice use of science in governance in Santa Ana will require focused planning, new levels of organizations and new communication strategies. For this reason, I recommend slowing down passage of a new General Plan for Santa Ana so that plans for developing this capacity are detailed and foregrounded.

The next General Plan for Santa Ana should include concrete plans to establish a new Santa Ana Office of Environmental Justice. This office would be responsible for assisting and monitoring new scientific research on Santa Ana, helping translate it into planning and policy. A new Santa Ana Office of Environmental Justice could also be responsible for hosting regular public meetings where new scientific findings can be shared and discussed. These meetings should be accessible in person, by phone and teleconference (Zoom).

Broad and extensive public sharing of information about scientific research relevant to local communities is a key aspect of best-practice use of science in governance.

The Santa Ana General Plan will be much stronger – and potentially a model for other cities around the United States – if it clearly acknowledges the importance of science in governance, detailing specific ways this will be accomplished.

Thank you for your attention and public service,

A handwritten signature in black ink, appearing to read "Mike Fortun".

Mike Fortun, PhD

cc: Adolfo Sierra, President, Madison Park Neighborhood Association
José Rea, Treasurer, Madison Park Neighborhood Association
Leonel Flores, GREEN Community Organizer, Madison Park Neighborhood Association
Jabari Brown, Myson Foundation Clinical Fellow, UCI Environmental Law Clinic

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December 7, 2021

Re: Environmental Justice in Santa Ana's General Plan Update

To Whom It May Concern,

Thank you for the opportunity to comment on the City of Santa Ana's Draft General Plan Update. I am Kim Fortun, Professor of Anthropology at University of California Irvine. For over thirty years, my research has focused on environmental injustice in settings around the world. Since 2017, I have studied environmental injustice across California. The City of Santa Ana has many, largely unrecognized environmental hazards. I applaud the initiatives of the Santa Ana City Council to address these hazards in coming years. Passage of a new General Plan provides important opportunities to detail these initiatives.

Many aspects of Santa Ana pose special environmental justice challenges, yet aren't adequately addressed (if at all) in the City's ["Environmental Justice Background and Analysis for the General Plan Update"](#).

- The city has important industrial facilities but they aren't dramatically visible to citizens (like the refineries in Wilmington, for example). These facilities release pollution into air and water every day, to an extent not yet adequately characterized. Some of the facilities also have potential for "worst case scenarios" in which a large amount of toxic chemicals would be released off site into adjacent communities, with devastating effects. The US Environmental Protection Agency has identified six facilities with worst case scenario potential in Santa Ana (see [this list](#)). Many of the facilities are very near homes and schools. Worst case scenarios are not addressed in the City's environmental justice analysis linked to above.
- The city is nestled among many freeways and has many schools and care facilities very near to freeways. The City is also cross-cut with many heavily traveled boulevards. A growing body of research points to serious health effects of near-roadway pollution, pointing to the need for new approaches to zoning and heightened use of green cover for air quality control. This research has guidance for urban planning. (See, for example, this [recently published research](#)). While greening is mentioned in the above environmental injustice analysis, special proposals advanced by community groups in Santa Ana have not been included. These include increased acreage of green space per resident and requirements for green walls and roofs.
- Orange County and the City of Santa Ana has gained national attention for pollution of water sources with PFOA ("forever chemicals," which have serious health effects). (See this [LA Times coverage](#)). The special challenges of addressing PFOA pollution (and potential increases in water costs for residents and businesses) are not included in the City environmental justice analysis linked to above.

- Workers in Santa Ana have recently identified illegal pollution levels in stormwater discharged by the Kingspan Light + Air factory in Santa Ana's Delhi neighborhood. (See [Voice of OC coverage](#)). This points to the need to better characterize and address water pollution from all industrial facilities in Santa Ana. It also points to the important role of industrial workers in Santa Ana as partners in environmental protection. These aren't addressed in the City's environmental justice analysis linked to above.
- There are rising concerns about environmental hazards faced within workplaces in Santa Ana. (See this [LA Times coverage](#)). This isn't addressed in the City's environmental justice analysis linked to above.
- The City of Santa Ana has many legally designated "disadvantaged communities" which deserve proactive initiative to address the environmental injustices they face. City of Santa Ana also has many highly capable community organizations ((Madison Park Neighborhood Association and Orange County Environmental Injustice, for example) that can be important, highly effective partners in initiatives to address environmental justice in the city. Plans to leverage these community organizations aren't yet detailed in the City's environmental injustice analysis linked to above.

The hazards and potentials listed above have not yet been well characterized or addressed in the City of Santa Ana's planning thus far. For this reason, I strongly recommend slowing down passage of a new General Plan.

The General Plan will be much stronger – and potentially a model for other cities around the United States – if it clearly acknowledges the many environmental hazards that need to be addressed in Santa Ana, detailing how this will be done.

A key aspect of a strong General Plan will be development of capacity to keep residents, business owners, schools and other stakeholders informed about environmental hazards and how they are being addressed in Santa Ana. I understand that this kind of communication is difficult to support in City governments given the scope of their responsibilities. I thus want to highlight the importance of establishing a new Santa Ana Office of Environmental Justice to lead and coordinate this. A key responsibility of this office would be to hold regular public meetings, sharing updates on the City's environmental justice initiatives and soliciting public input.

Thank you for your attention and public service,



Kim Fortun, PhD

cc: Adolfo Sierra, President, Madison Park Neighborhood Association
José Rea, Treasurer, Madison Park Neighborhood Association
Leonel Flores, GREEN Community Organizer, Madison Park Neighborhood Association
Jabari Brown, Myson Foundation Clinical Fellow, UCI Environmental Law Clinic

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Kristine Ridge, City Manager, City of Santa Ana
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DEPARTMENT OF TRANSPORTATION

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December 6, 2021

*Making Conservation
a California Way of Life.*

Ms. Melanie McCann, Principal Planner
City of Santa Ana
Planning and Building Agency
20 Civic Center Plaza
Santa Ana, CA 92701-4058

Electronically Sent
mmccann@santa-ana.org
jaguevara@santa-ana.org

Dear Ms. McCann:

The California Department of Transportation (Caltrans) Division of Aeronautics (Division) appreciates the City of Santa Ana's (City) Notice of Intent (NOI) to overrule as is required by California Public Utilities Code (PUC) section 21676(b). The notice informs the Division of the City's intent to overrule the October 15, 2021, Orange County Airport Land Use Commission's (OCALUC) determination that the proposed amendment to the City's General Plan update *Golden City Beyond* (Project) is inconsistent with the 2008 Airport Environs Land Use Plan (AELUP) for the John Wayne Airport (JWA) regarding the City's comprehensive update of the Golden City Beyond General Plan. Resolution No. 2020-078 to overrule was signed the next day, October 16, 2020, by Mayor Miguel A. Pulido, which shows the City's intent to overrule before the ALUC issued its determination.

According to the NOI, "Pursuant to PUC Section 21676(b), the City may overrule the commission by a two-thirds vote of the City Council if it makes specific findings that the Project is consistent with the purposes of the State Aeronautics Act (SAA), as stated in PUC Section 21670. And, the City finds that the Project is consistent with the JWA AELUP and the ACT based on the following Findings of Fact and substantial evidence." In advance of a public hearing on the Resolution to consider overruling the ALUC's determination, the Division is providing the following comments pursuant to PUC section 21676.

A goal of the Division is to assist cities, counties, and ALUCs in the implementation of policies that protect the safety and welfare where aeronautical activities take place. Another goal is to support public access to State permitted airports as well as the planned development and retention of airports across California. The most heavily used and relied upon of these airports are the commercial service airports, including JWA.

Beyond the value of being an access point to the National Airport System supporting air passenger and air cargo traffic, airports are critical to the air attack agencies that rely on quick response times to manage incidents to minimize the loss of life and property. During emergencies such as a pandemic or wildfire, the public may be more tolerant to aircraft noise. However, once these events subside, the number of noise complaints

fielded by JWA may increase as operations return to pre-pandemic levels. The Project's land use changes could exasperate this noise issue, particularly within the three Focus Areas within the AELUC for JWA airport planning area (AIA). As a result, JWA's future operational viability could be diminished.

The JWA Economic Impact Study (2014) illuminates the value of this extraordinary economic engine and why it should be preserved, since it supports 22,000 jobs with \$2.8 billion in economic output, including \$230.8 million in tax revenues. Ranked as the sixth busiest commercial airport in California, it is important to note that JWA is a self-supporting enterprise that receives no general fund tax revenue, while serving as many as ten million passengers annually between 2015–2019. (<https://www.ocair.com/about/news-info/statistics/>).

As a part of the JWA's good neighbor policies, this airport is one of a few airports that restricts hours of commercial airline's aircraft operations to those between 11:00 p. m. and 7:00 a. m. The noise program was a result of collaboration with neighboring communities, and the Division encourages this type of partnership in the planning process.

The Division is concerned by the City's Project and this proposed resolution to overrule the ALUC regarding its inconsistency determination, which includes revisions to the existing elements, the addition of new elements, and five new focus areas for future development. The Division is most concerned with the cumulative effect of the proposed zoning changes related to the three focus areas within the ALUC's Airport Planning Area (AIA). These focus areas are expected to add nearly 18,000 new residents to the population impacted by JWA traffic patterns and approach /departure overflights.

Minimizing the public's exposure to aircraft noise and the increased risk from even a single aircraft accident with mixed-use housing and structural heights of these buildings is the overall intent of the AELUP for JWA. The focus areas' land use designation changes are within the Approach-Departure path of the primary runway end 20R. The Division agrees with the ALUC that the City's proposed Project will subject future residents to a very high frequency of commercial passenger aircraft overflights. Furthermore, this action by the City may be in violation of the provisions of the SAA, as well as Senate Bill (SB) 1000, for safety and environmental justice and other CEQA provisions for protections from aircraft noise.

The City's proposed action to overrule and allow increased housing densities than those currently allowed within the AIA AELUC for JWA could be in direct violation of section 21676(b), SB 244, Local government: land use: general plan: disadvantaged unincorporated communities, and SB 1000, Land use: general plans: safety and environmental justice.

Additionally, California Health and Safety Code section 17922.6 regulates noise for multi-family dwellings. These laws have the goal of protecting people from airport

impacts and reducing the unique or compounded health risks in disadvantaged communities and to foster economic, social, and educational equality.

More directly, despite any Federal Aviation Administration Determination of No Hazard for the proposed new buildings within the focus areas, the cumulative effect by the proposed building heights are a major concern to the ALUC and the Division. On a case by case basis, the ALUC may find a proposed project to be inconsistent with the AELUP, particularly as it relates to sections 1.2 and 2.1.4, and the PUC, section 21674 (a). The Division shares the ALUC's concern and interpretation of their role as it regards the proposed growth in mixed-use developments and associated structural building heights. This is in accordance with the AELUP for JWA, section 2.1.3 pages 13-14, which states:

A [n] [Federal Aviation Administration (FAA)] Determination of No Hazard to Air Navigation does not automatically equate to a Consistency determination by the ALUC. The FAA may also conclude in their aeronautical study that a project is an "Obstruction" but not a Hazard to Air Navigation...The commission may utilize criteria for protecting aircraft traffic patterns at individual airports which may differ from those contained in FAR Part 77, should evidence of health, welfare, or air safety surface sufficient to justify such an action.

According to Government Code section 65302.3 (a), a city's general plan as well as any applicable specific plans, "shall be consistent" with an ALUCP (e.g. AELUP for JWA) and that every affected city must amend its general and specific plans as necessary to keep them consistent with the ALUCP. To further clarify how an ALUC addresses newly proposed construction projects and use permits and structure height, refer to PUC 21676(a).

The City's Findings of Fact note that the 2008 AELUP for JWA is not consistent with the 2011 California Airport Land Use Planning Handbook (Handbook) does not apply, since Handbook updates do not impact the currently adopted AELUP for JWA. The SAA requires coordination between airports and local land use but does not specify how often plans should be updated. The Handbook will guide subsequent AELUP updates. ALUCs are encouraged to expand on the Handbook's recommended minimums, where justified, to protect the airport's viability and public welfare from further incompatible land uses.

Also, the City finds "The vast majority of the Project falls outside of the JWA AELUP planning area, which is defined in Section 1.7 of the JWA AELUP as the furthest extent of the 60 CNEL Contour, the FAR Part 77 Notification Surface and the runway safety zones associated with the airport..." The City also finds that the Project is consistent with the JWA AELUP as "the majority of the project falls outside the 60 dBA CNEL aircraft noise contour" and "the vast majority of the project is located outside the 65 dBA CNEL aircraft noise contour." However, three out of five focus areas are all or partially within

the AELUP planning area (AIA), including the 55 Freeway/Dyer Road Focus Area, the South Bristol Focus Area, and the South Main Focus Area.

Citing JWA AELUP section 3.2.3 Noise Impact Zone 1 for “Residential use sound attenuation required to ensure that the interior CNEL does not exceed 45 dB” overlooks a key provision of the section, “residential uses within the 65-70 dBA CNEL noise contour must be ‘indoor -oriented’ to preclude noise impingement on outdoor living areas, as defined in Section 1.7.” The provision in between states, “All residential units are inconsistent in this area unless it can be shown conclusively that such units are sufficiently sound attenuated for present and projected noise exposures, which shall be the energy sum of all noise impacting the project, so as not to exceed an interior standard of 45 dB CNEL.”

The Division supports the determination of inconsistency by the ALUC to be following the intent of the AELUP for JWA and its role to concurrently protect public safety and airport viability in concert with local development, as directed by PUC 21 674(a). The Division also acknowledges the concerns noted by the OCALUC and JWA regarding the aircraft noise impact on all residents who will occupy the site for the foreseeable future. Therefore, the Division is concerned that the subsequent mixed-use developments will limit JWA's future operational capacity. Finally, the City of Santa Ana's City Council Resolution to Overrule the ALUC will remove the ALUC's liability.

Please note: The Division's comments are to be included in the public record of any decision to overrule the ALUC.

If you have questions or we may be of further assistance, please contact me via email at kevin.ryan@dot.ca.gov.

Sincerely,

Originally signed by

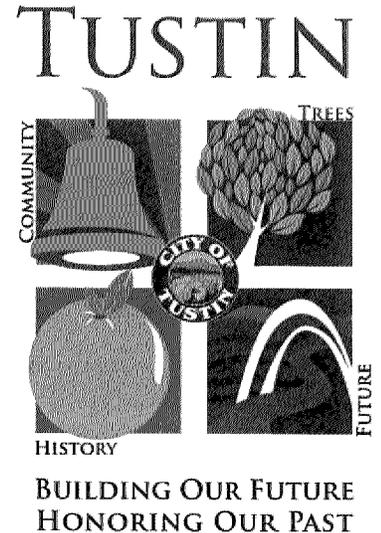
KEVIN RYAN
Associate Aviation Planner

c: Ms. Lea Choum, Executive Officer, Orange County Airport Land Use
Commission, 3160 Airway Avenue, Costa Mesa, CA 92626-4608; ALUCinfo@ocair.com

Community Development Department

December 7, 2021

Mayor Sarmiento and Members of the City Council
City of Santa Ana
20 Civic Center Plaza
Santa Ana, CA 92702
ecomments@santa-ana.org



Re: Santa Ana General Plan Update and Program Environmental Impact Report (State Clearinghouse Number: 2020029087)

Mayor Sarmiento and Members of the City Council:

The City of Tustin appreciates the opportunity to submit this letter on the Santa Ana General Plan Update (GPU) and its Final Program Environmental Impact Report (FEIR). As a neighboring jurisdiction, Tustin has been closely monitoring the proposed GPU as its land use changes have the potential to adversely affect the City, its residents, and its environment. Given the magnitude of development contemplated by the GPU, it is imperative that the EIR comprehensively evaluate and mitigate the GPU's environmental impacts. Unfortunately, a detailed review of the FEIR, including the responses to Tustin's September 16, 2020, October 6, 2020 and September 20, 2021 letters, reveals that the FEIR fails to comply with the California Environmental Quality Act (CEQA).

Tustin's letters identified numerous legal inadequacies in the DEIR and the Recirculated DEIR (hereinafter collectively referred to as "DEIR"). In particular, we explained that the DEIR failed to adequately analyze or mitigate the GPU's recreation, transportation, air quality, noise, and hazards impacts. We also determined that the DEIR failed to provide a legally defensible alternatives analysis. Such fundamental errors undermined the integrity of the DEIR.

The FEIR dismisses many of Tustin's comments and downplays numerous others. In many instances, the FEIR merely seeks to defend the erroneous assertions and conclusions of the prior documents. The remainder of this letter addresses the FEIR's legal deficiencies. We will not reiterate the comments raised in our prior letters to Santa Ana. Instead, we will elaborate on some of the FEIR's most serious shortcomings.

The FEIR Fails to Rectify Deficiencies in the DEIR's Analysis of and Mitigation for Park and Recreation Impacts.

As we explained in our prior letters, the DEIR erred because it did not analyze park and recreation impacts to the City of Tustin that would result from the GPU's proposed development. We explained that these impacts are likely to be acute given the deficient supply of parkland in Santa Ana and the lack of existing parks in the 55 Freeway/Dyer Road focus area in particular. The FEIR does nothing to resolve this legal deficiency as it fails to make *any* attempt to analyze the GPU's impacts to Tustin's

park and recreation facilities. Instead of providing the impact analysis we requested, the FEIR adds a mitigation measure, asserting that the measure would address Tustin's concerns. (See FEIR, Response to Comments, Response A2-2, pp. 2-25, p. 2-27). Unfortunately, this mitigation measure does not address Tustin's concerns. Nor, as we explain below, does the measure comply with CEQA's clear standards.

Mitigation Measure REC-1 calls for Santa Ana to monitor future residential development projects within the 55 Freeway/Dyer focus area and to prepare a public park utilization study to evaluate those projects' potential impacts on existing public parks within a one-half mile radius of the focus area. (FEIR, Response to Comments, Response A2-2, pp. 2-25, 2-26). If the utilization study determines a project would result in a significant impact, the mitigation measure calls for Santa Ana to mitigate the impact by implementing measures such as land dedication and making a fair-share contribution to acquiring new or enhancing existing public parks within the one-half mile radius. *Id.*

There are several flaws with this mitigation measure. First, we query the nature of the utilization study. If, as the EIR alleges, Santa Ana could not evaluate the increase in park demand during this EIR process, how would it be able to evaluate the increase in demand once a particular development project is proposed? Santa Ana already knows precisely how much residential development is proposed by the GPU within the 55 Freeway/Dyer focus area. The EIR clearly could have made some attempt to identify the increase in demand on Tustin's parks and evaluated how this increase in demand would affect Tustin's facilities. Setting aside the fact that this impact analysis should have been undertaken during the DEIR stage, in order for this new mitigation measure to comply with CEQA, it must outline the methodological approach to the utilization study. Specifically, how will Santa Ana measure the level of deterioration to Tustin's park facilities and what criteria or thresholds will Santa Ana rely upon to determine whether an individual project would cause a significant impact?

Second, CEQA allows a lead agency to defer mitigation (i.e., the preparation of the utilization study) only when: (a) an EIR contains criteria, or performance standards, to govern future actions implementing the mitigation; (b) practical considerations preclude development of the measures at the time of initial project approval; and (c) the agency has assurances that the future mitigation will be both "feasible and efficacious." *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 94-95 ("CBE"); *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 669-71; Guidelines § 15126.4(a)(1)(B). Here, the EIR meets none of these requirements.

The EIR contains no rationale for why it is necessary to defer preparation of the utilization study. Nor does the mitigation measure contain the necessary performance standards CEQA requires. Finally, the EIR makes no attempt to explain how land dedication and/or a fair share contribution will work. Would Santa Ana dedicate land to Tustin? If so, how will the acreage of land be determined? Would Santa Ana make the fair share contribution to Tustin? If so, how would the fair share percentage be calculated? As it is currently written, this mitigation measure is vague and unenforceable and offers no assurance that it will reduce the GPU's park and recreation impacts. Consequently, Mitigation Measure REC-1 does not meet CEQA's requirements. (See CEQA Guidelines § 15126.4 (a) (2) (mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments).

Third, the study area of Mitigation Measure REC-1 is too narrow and, as a result, will not ensure that impacts are sufficiently mitigated. As its currently written, the measure calls for preparing a utilization study to evaluate projects' impacts within a *one-half* mile radius of the 55 Freeway/Dyer focus area. While there is one park, Legacy Park, within one-half mile of the focus area, another park, Victory Park, is about 2,700 feet from the border, just outside the one-half mile radius. Tustin also plans to develop another park, a linear park within Tustin Legacy. For this reason, Mitigation Measure REC-1 should be revised so that the utilization study is undertaken for projects within a *two-mile* radius of the focus area.

To rectify these problems, Santa Ana must revise Mitigation Measure REC-1 to ensure that it provides an enforceable binding commitment to mitigate the GPU's recreation impacts on the City of Tustin. To this end, Tustin requests that Santa Ana adopt a GPU Condition of Approval calling for a Parks and Recreation Memorandum of Understanding (MOU) between Tustin and Santa Ana. This MOU would commit Santa Ana to work in good faith with Tustin to develop an approach for the utilization study (that would include, at a minimum, thresholds of significance, a methodology for determining the extent of impacts on Tustin's parks, and an expanded geographic boundary). The MOU would also provide that, should the utilization study determine significant impacts caused by the GPU, Tustin is financially compensated, either with land dedication or with a mutually agreed upon fair-share contribution.

While we appreciate that Santa Ana has committed to working closely with adjacent cities when it eventually prepares its Parks and Recreation Master Plan (see FEIR pp. 5.15-29), a mere a commitment to consult during the Master Plan process is not sufficient. Because the EIR's language regarding the Master Plan process is vague and non-binding, the EIR offers no assurance that the GPU's impacts on Tustin would be adequately mitigated.

Santa Ana Should Enter into a MOU With Tustin Regarding the GPU's Traffic Impacts.

Tustin appreciates that Santa Ana updated its GPU traffic study to include additional intersection locations. The Updated Traffic Analysis acknowledges that the GPU would cause significant impacts at the following locations in year 2045: (1) Red Hill Avenue/Warner Avenue; (2) Tustin Ranch Road/Warner Avenue; and (3) Tustin Ranch Road/Walnut Avenue. (FEIR (October 2020), Appendix K, pp. K-1; K-97;K-1362-1364). The Updated Traffic Analysis states that Santa Ana will contribute its fair share toward the necessary improvement measures. *Id.*

Tustin has ongoing concerns regarding Santa Ana's approach to compensating Tustin for impacts to the City's three intersections caused by the GPU. As an initial matter, the language regarding the payment of the fair share contributions is vague. To rectify this, Santa Ana must explicitly commit to making its fair share contribution *to the City of Tustin* for the necessary improvements. Historically, Tustin has paid the City of Santa Ana millions of dollars towards mitigation obligations related to the Tustin Legacy Specific Plan's traffic impacts. The dollar amount was based on fair share for improvements at locations where the Specific Plan further contributed to an already deficient intersection and 100 percent share for improvements at intersections where the Specific Plan caused the intersection to exceed Santa Ana's performance criteria. In turn, Santa Ana should accept responsibility for addressing impacts caused by its GPU as identified in the Updated Traffic Analysis. Specifically, Santa Ana should commit to paying 100 percent of the costs of improving the intersections of Red Hill Avenue/Warner Avenue and Tustin Ranch Road/Warner Avenue North. It

must also commit to paying its fair share of 84.5 percent (based on the highest peak hour impacted) at the Tustin Ranch Road/Walnut Avenue intersection.

To this end, Tustin requests that Santa Ana adopt a GPU Condition of Approval calling for a Transportation Fair Share Funding Agreement MOU between Tustin and Santa Ana that documents that the cities will work together in good faith to implement a fair share funding agreement.

In addition, although not located in the City of Tustin, the GPU would cause a significant impact at the SR-55 Southbound Ramps/Fourth Street-Irvine Boulevard intersection. (FEIR (October 2020), Appendix K, p. 1360). Given its proximity to Tustin, traffic congestion at this intersection will affect Tustin's residents and employees. Despite this fact, we can find no indication that Santa Ana intends to contribute its fair share toward the necessary improvements at this intersection. We request that the Traffic Analysis be revised to identify the necessary improvements to the SR-55 Southbound Ramps/Fourth Street-Irvine Boulevard intersection and that the aforementioned Transportation MOU between Santa Ana and Tustin commit to ensure that improvements to this intersection are undertaken in an expeditious manner.

Santa Ana Should Adopt the Reduced Park Demand Alternative

Recognizing the severity of the GPU's park and recreation impacts, the City included a Reduced Park Demand Alternative in the Recirculated DEIR. This alternative modifies land use and reduces residential growth by eliminating and reducing certain residential land uses and intensities. (FEIR, Response to Comments, Response A2-11, p. 2-30). Although recreation impacts under this alternative would remain significant and unavoidable, it would nevertheless reduce the GPU's recreation impacts given the lack of available land within San Ana for new parks. (*Id.* citing RDEIR, p. 7-30). Because this alternative would likely reduce recreation impacts within Tustin as well as Santa Ana, we respectfully request that Santa Ana adopt the Reduced Park Demand Alternative.

We appreciate the opportunity to provide these comments. Please feel free to contact me at jwillkom@tustinca.org with any questions or concerns.

Very truly yours,



Justina L. Willkom
Community Development Director

cc: Matthew S. West, City Manager
Nicole Bernard, Assistant City Manager
Doug Stack, Public Works Director
Krys Saldivar, Public Works Manager
Irma Huitron, Assistant Director – Planning
Scott Reekstin, Principal Planner

Orozco, Norma

From: Patricia Flores <patricia@ocej.org>
Sent: Monday, December 06, 2021 6:23 PM
To: eComment
Subject: Public Comment: Do Not Approve the Santa Ana General Plan Update

Dear Santa Ana City Council:

We are writing to you as ¡Plo-NO! Santa Ana, a collaborative including [Orange County Environmental Justice \(OCEJ\)](#), Jóvenes Cultivando Cambio (Youth Cultivating Change), and researchers from the [UC Irvine Program in Public Health](#) and the [UCI Community Resilience Project](#), which formed in 2017 to investigate soil-lead contamination and advocate for remediation and the health equity needs of Santa Ana's disadvantaged communities. We are a coalition of grassroots leaders, Santa Ana residents, and community-driven scholars with backgrounds in public health, history, environmental sciences and law, and **we are writing to ask that you vote to not approve the Santa Ana General Plan Update (GPU), until it includes policies to comprehensively address the decades-long soil-lead crisis and its toll on the health of our most vulnerable communities.** We are concerned that the community outreach process for the GPU has not sufficiently engaged with the perspectives and needs of impacted residents, and that the current policies do not adequately remediate the environmental injustices faced by our city's most vulnerable communities.

From 2018 to 2019, our collaborative collected 1555 soil samples from across Santa Ana, tested them for soil-lead content, and found that 52.7% of residential samples had Pb concentrations in excess of the 80 ppm safety threshold established by the California EPA's [Office of Environmental Health Hazard Assessment](#), and 11 Census tracts were characterized as high risk according to our Cumulative Risk Index. What's more, we found that the neighborhoods most impacted by soil-lead contamination were also:

- Predominantly people of color
- Lower median household income
- Lower % of college educated residents
- Higher proportions of renters
- Higher fraction of residents without health insurance
- Higher proportion of residents with immigrant status background
- Limited English proficiency
- Predominantly Latinx/Hispanic residents

The [State of California defines Environmental Justice \(EJ\)](#) in section 65040.12(e) of California Government Code as "the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." By this definition, Santa Ana's low-income residents of color are suffering a great environmental injustice, and the General Plan is our city government's opportunity to implement comprehensive policies to address this injustice.

When Santa Ana residents mobilized last Fall to ask that the city undergo an outreach and engagement process to include the needs and voices of our most impacted community members, we were pleased that the city paused adoption of the General Plan Update and invited our collaborative, among other important stakeholders, to a series of roundtable discussions to inform the development of a community survey. We provided feedback that the survey's design forced residents to choose between environmental justice priorities, rather than allowing them to highlight all of the issues that affect their communities. Furthermore, we observed that most of the lead contamination-related questions assumed that the main source of lead contamination was lead-based paint and neglected other sources, such as historical emissions of leaded gasoline, which, according to the literature, was the largest contributor of lead to urban environments. They also relied on residents having specific data about the sources of lead contamination in their properties and neighborhoods, including information such as the year in which their home was built, which is not common knowledge for most renters. We were disappointed, however, to see that the city did not address these concerns in the final version of the survey disseminated to Santa Ana residents and, although soil-lead contamination still emerged as the second highest priority, we believe that a better-structured survey would have more accurately represented the perspectives of our communities.

In addition to our critiques of the content of the survey, we also feel that the city did not effectively outreach to the community to ensure their participation in the process. Out of Santa Ana's 332,318 residents, only 746 completed the survey, or about 0.2% of our total population. This does not constitute an accurate assessment of our communities' environmental justice needs. We, along with many other residents and community stakeholders, believe that a more thorough community engagement process is needed to better inform the update to the City's General Plan.

While we also appreciate that the City Planning Department invited our Collaborative to a series of meetings to present our research and inform policies to address the soil-lead crisis, ultimately, very few of our proposed solutions were incorporated into the GPU. **The soil-lead policies that were adopted are insufficient, because:**

- 1. There are no provisions for the city to engage in soil-lead testing in residential neighborhoods, and no clear process or agreed upon safety thresholds for identifying lead-contaminated properties;**
- 2. While Implementation Action 2.4 of the Safety Element expresses a commitment to working with our organization to understand the prevalence of environmental lead contamination in Santa Ana and to proposing solutions and measurements of effectiveness, there is not an actual expressed commitment to remediating the lead. What's more, the timeline limits the action to 2022--with a problem as widespread as soil-lead contamination, one year is not enough time to effectively address the crisis; and**
- 3. There is no commitment to collaborating with the Orange County Health Care Agency to provide healthcare services for undocumented and uninsured residents living in neighborhoods impacted by soil-lead contamination.**

In addition, there are no provisions ensuring that Santa Ana residents are prioritized for jobs to remediate lead contamination, and that they are provided proper protective equipment and living wages; and prioritizing bioremediation over removal of contaminated soils, to save money and avoid moving contaminated soils into other communities. All of these policies are of dire importance, in order to finally put an end to the poisoning of our residents, and to ensure that the city's response to this crisis addresses the negative health effects that our communities are already suffering. Furthermore, the Santa Ana City Council recently passed the Santa Ana Public Health and Climate Emergency Resolution, which commits the city to "implementing policies to remediate lead and other environmental toxins, in tandem with renter protections to ensure that remediated households are not displaced as a result of environmental clean up efforts." The General Plan Update is the perfect opportunity to put this resolution into action.

While the City has committed in the latest draft of the General Plan to work with our Collaborative and the Orange County Health Care Agency (OC HCA) to advocate for more stringent lead screening measures at the local and state levels, as well as to discuss proposed solutions for remediating soil-lead and to increase access to blood-lead testing for Santa Ana residents, these activities are limited to 2022 in the listed timeframe. These are projects that will require an ongoing effort over several years to accomplish, and the city must commit to continuing this work beyond next year if we hope to effectively address lead contamination in Santa Ana.

In order to ensure that the final version of the General Plan genuinely reflects the perspectives and needs of Santa Ana residents and expert community stakeholders, we request that the City participate in an additional series of roundtable discussions with impacted residents and community groups such as our own, in order to confirm their approval of the current policy language and incorporate any pending resident concerns. We also request an additional, specific meeting to discuss incorporating more comprehensive policies to address environmental lead contamination, especially considering the recent passage of the Santa Ana Public Health and Climate Emergency Resolution. In this way, we can collaboratively develop a robust General Plan that effectively addresses the numerous environmental justice and health concerns of our residents, and ensures that those communities most impacted by these issues can heal from this crisis, and thrive in Santa Ana for generations to come.

Thank you for your time and consideration.

Sincerely,

Patricia J. Flores Yrarrázaval
Project Director
Orange County Environmental Justice

Alana LeBron, PhD
Assistant Professor
University of California, Irvine

Jun Wu, PhD
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Orozco, Norma

From: Ian Ross Baran <ibaran@uci.edu>
Sent: Monday, December 06, 2021 10:49 PM
To: eComment
Cc: Bacerra, Phil; Lopez, Jessie; Mendoza, Nelida; Penaloza, David; Phan, Thai; Ridge, Kristine; Sarmiento, Vicente; Hernandez, Johnathan; Carvalho, Sonia R.; Adolfo Sierra; Jose Rea; Leonel Flores; jjbrown.clinic@exchange.uci.edu
Subject: General Plan Update

12/06/2021

Re: Environmental Justice in Santa Ana's General Plan Update

To Whom It May Concern,

Thank you for the opportunity to comment on the City of Santa Ana's Draft General Plan Update. I am a PhD Candidate in the Urban and Environmental Planning Department at UC-Irvine as well as a Research Justice Fellow who has been working with Madison Park Neighborhood Association since the Fall of 2020. Much of my work focuses on the intersection of environmental justice, community development, and structural inequality, as well as the ways that communities are generally left out of processes that gravely impact them.

I would like to raise concerns regarding the General Plan Update:

1. Environmental justice is a huge concern for residents in Santa Ana, many of whom live near businesses and factories that emit toxic substances which pollute and affect the air and water quality for residents. This causes asthma and other major conditions, which has major consequences both health, social, and economic, for residents, but most seriously and above all causes premature death.
2. There is an inadequate amount of community input on environmental justice issues. This is extremely important. Oftentimes community voices are overlooked in these processes, which means that city council cannot actually adequately address the needs of its residents without the necessary input to know what to address. As an addition, community engagement over Zoom needs to be the standard now set to ensure maximum participation at events that have drastic consequences for residents. Their voices need to be heard and need to shape the way of the city's future.
3. There needs to be better transparency and accountability established within the General Plan. This means public access to reports and other key information, an Environmental Justice compliance department to oversee emissions regulation, and monthly reports created on vital information.

In summary, there has not been enough community input on environmental justice issues and the General Plan itself does not take environmental justice issues and harms seriously which has drastic consequences for residents. The only way forward is that the General Plan process needs to be delayed.

Sincerely,

Ian Baran

PhD Candidate, Urban and Environmental Planning, UC-Irvine, Research Justice Fellow

cc: Adolfo Sierra, President, Madison Park Neighborhood Association

José Rea, Treasurer, Madison Park Neighborhood Association

Leonel Flores, GREEN Community Organizer, Madison Park Neighborhood Association

Jabari Brown, Myson Foundation Clinical Fellow, UCI Environmental Law Clinic

Vicente Sarmiento, Mayor, City of Santa Ana

Thai Viet Phan, Ward 1 Councilmember, City of Santa Ana

David Penaloza, Ward 2 Councilmember, City of Santa Ana

Jesse Lopez, Ward 3 Councilmember, City of Santa Ana

Phil Bacerra, Ward 4 Councilmember, City of Santa Ana

Johnathan Ryan Hernandez, Ward 5 Councilmember, City of Santa Ana

Nelida Mendoza, Ward 6 Councilmember, City of Santa Ana
Kristine Ridge, City Manager, City of Santa Ana
Sonia Carvalho, City Attorney, City of Santa Ana

Orozco, Norma

From: Aaron Senese <aaronlsenese@gmail.com>
Sent: Sunday, December 05, 2021 11:28 AM
To: eComment
Subject: December 7th meeting: the future of upgraded transit along Bristol

Categories: Correspondence

To the council of the City of Santa Ana

My name's Aaron and I'm a resident of DTSA.

It's recently come to my attention that the General Plan for Santa Ana will soon be under review. Given that the mayor and a number of council members have expressed a desire to increase the utilization of mass transit within the city, I believe there's one thing we have to bear in mind;

The opportunity cost of driving versus riding mass transit must be adjusted. In more simple terms; the quality of our mass transit service determines how likely someone is to choose mass transit for their trip.

Frequency, speed and accessibility are all key factors in this - factors that a distributed bus network alone cannot solve. It isn't just advisable but absolutely necessary for our council to explore, study and support higher capacity for our most frequently used routes - both in the interest of ridership and improving the lives of those of us like me who must take mass transit and have no other choice.

Since the long-term plan for the section of Bristol St. running through Santa Ana is being considered in the General Plan, I'd like to focus on route 53, which runs past locations like South Coast Plaza, the Outlets and Angels' Stadium - some very important magnet locations which draw a large number of trips by car already.

The 53 already runs local and express versions of the route and, with some limited changes to major intersections along Bristol St. and the repainting of lanes, it would be possible to run existing vehicles in center running lanes, allowing express busses to run quickly and unimpeded between major stops. If stoplight prioritization for these busses was included in the upgrade, they could run seamlessly - almost as if they had their own dedicated right of way.

To put it bluntly; the cost of this would be two lanes on Bristol street - one in each direction. This cost is, of course, the elephant in the room for anyone who commutes as part of their living. However, automotive traffic is a complex issue, and this upgrade has potential benefits for drivers.

First; more people using transit along Bristol means more trips up and down the street by car are removed. Put simply, a single person using their car can be imagined to take up nearly the length of a city bus due to the size of their car and the leeway in front and behind the car - and that's per-person if someone is driving alone. Imagine the passenger count of a single bus, now imagine each of these had their own bus. That's the basic reality of road traffic. Each bus worth of passengers is twenty or more busses worth of space freed up for other drivers who need or really want to drive.

Second; less lanes can mean less conflict between cars. Merging slows traffic down, this is part of the reason that Bristol has limited intersections and it's also why two-lanes of traffic can have more throughput than three. There's also the fact that express and local busses will no longer be encountering each other and attempting an overtake.

Long term, there is a great deal of extra space around Bristol and more radical widening plans could include rights of way - both north and south - for center running busses while still maintaining the same number of lanes for cars. The busways could be easily converted to streetcar lines when the community finds they are necessary, making busways a useful interim step, one that requires much less commitment but gives many of the same benefits.

Having a single seat ride from anywhere on Bristol to Angels' Stadium and the Outlets at Orange would, of course, be the biggest benefit to everyone. Imagine not having to hunt for a parking spot for 30 minutes! That alone should give our automotively inclined residents pause before writing off this idea, and I hope everyone will give it fair consideration.

Orozco, Norma

From: D. Rod <monkey_1886@hotmail.com>
Sent: Friday, November 26, 2021 11:44 AM
To: eComment
Subject: City Council Meeting

Categories: Correspondence

Good afternoon,

Do any of you live in the areas to be impacted? Please put \$\$\$ and greed aside and consider quality of life for those that already live in these areas. Overcrowding is already an issue and here you are proposing 17,575 new housing units – of which we are all certain will be high density, cramming as many bodies into limited space.

The traffic, the air quality, the noise.....in your own Notice of Public Hearing you cite “significant....adverse environmental impacts”. That sentence alone should give you pause. Environmental Impact paragraph ends with “all other environmental impacts were found to be less than significant”. Any impact we have on our local environment is significant. It truly is sad what is becoming of all of our cities under the guise of “progress”.

The City will certainly do whatever will bring in the most \$\$\$ regardless of what the residents feel/want, that is a given. I still thank you for the opportunity to voice my concerns although they fall on deaf ears.

Have a great day. Make good choices.

Doris Rodriguez