

Catalog of City of Santa Ana Draft General Plan Update Comments Received Post February 15, 2022

#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
1	Suggested Policy Change: Policy CM-1.2: Community Input - Engage residents and community facility users with meaningful and effective participation to provide input for facility improvements and programming. Assure potentially affected community residents that they have opportunities to participate in decisions that affect their environment and health, and that the concerns of all participants involved will be considered in the decision-making process.	Recommended Policy Change: CM-1.2: Community Input. Engage residents and community facility users with <u>meaningful and effective participation</u> to provide input and involve them <u>in the decision-making process</u> for community facility improvements and programming.	The proposed policy is intended to foster meaningful engagement in the decision-making process related to improvements to public recreation facilities and programming. The policy has been modified to clarify the intent and to reflect the spirit of the recommended changes by including suggested language to foster meaningful engagement and to involve users in the decision-making process.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
2	Add Policy: Policy CM-1.2a: Hold meetings, workshops, and public comment periods at times and locations that are convenient for community members to attend, especially those that may be directly affected by a particular decision. Include community input and feedback when determining meeting time and location. Manage agendas so that items with community input are addressed at a reasonable hour.	1) Existing Action: PS-3.15: Agenda Management. Consider enhancements to the agenda management system to ensure public meetings run smoothly, increase internal efficiency, document decisions proficiently, and maintain public transparency. 2) Recommended Action Change: CM-1.2: Community Conversation. Plan for and conduct a community survey every <u>two years</u> related to community health, <u>pollution</u> concerns, parks, <u>community engagement</u> , and community service needs, with focused outreach to environmental justice priority areas <u>utilizing various platforms, such as social media and school events, to encourage substantial survey participation.</u>	Existing Action PS-3.15, with target implementation year of 2022, will consider further enhancements to address City meeting agenda and related public engagement. In addition, Action CM 1.2 provides for a survey tool as an opportunity for community input on best practices for residents to engage in City meetings, workshops, and the decision making process. This action has also been modified to include suggested changes where appropriate.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
3	Suggested Policy Change: Policy CM-3.3: Health Residential Programs - Invest in programs and public improvements that educate residents about opportunities to increase their physical activity and improve their health, especially in areas with higher risk of negative public health outcomes.	Recommended Policy Change: CM-3.3: Health Residential Programs. Invest in programs and public improvements that educate residents about opportunities to increase their physical activity and improve their health, <u>especially in environmental justice communities with higher risk of negative public health outcomes.</u>	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
4	Add Policy CM-3.11 or Action CM-3.9: Establish a permanent staff position and City office focused on environmental justice, responsible for 1) collecting and disseminating information relevant to environmental justice in Santa Ana 2) serving as a liaison between the City, community organizations, and the multiple government agencies responsible for some aspect of environmental justice 3) coordinating the City's environmental justice programs 4) planning community meetings and ensuring follow through.	Recommended New Action: <u>CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input. Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
5	Suggested Action Change: Action CM-1.2: Community Conversation - Plan for and conduct a yearly community survey every three years related to community health, air-quality pollution concerns, parks, and community service needs, with focused outreach to environmental justice priority areas. Undertake substantially more outreach on various platforms, including social media and school events, to inform residents about the community outreach meetings and to encourage substantial survey participation.	Recommended Action Change: CM-1.2: Community Conversation. Plan for and conduct a community survey every <u>two years</u> related to community health, <u>pollution</u> concerns, parks, <u>community engagement</u> , community service needs, with focused outreach to environmental justice priority areas <u>utilizing various platforms, such as social media and school events, to encourage substantial survey participation.</u>	The intent of the draft action is to continually receive feedback from the community and is recommending conducting a targeted EJ survey that focuses on community health, pollution concerns, parks, service needs and City community engagement best practices. The timeframe has been revised to every two years. Two years will provide the needed time to formulate surveys, provide sufficient time to respond, collect data, analyze data, report findings, and formulate actions to address feedback.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
6	Suggested Action Change: Action CM-3.6: Fresh and Healthy Foods - Pursue programs, incentives, and/or grants to encourage urban agriculture and small grocery or convenience stores to sell fresh foods in the city, especially those within environmental justice area boundaries. Conduct a study to identify areas of the City that lack access to fresh and healthy foods. Examples include grants or loans to purchase updated equipment, publicity, or directories of healthy food outlets, or connecting stores to wholesale sources of healthy, local, or organic food.	Recommended New Action: <u>CM-3.6A: Food Deserts. Collaborate with Orange County Health Care Agency (OCHCA) to gather and map food desert data, and share publicly through the City's Environmental Quality webpage.</u>	Food deserts were researched as part of the development of the draft General Plan. That research revealed that no food desert areas currently exist in Santa Ana. To monitor and visualize this data, staff recommends adding a new action to collaborate with OCHCA to gather and map data and make it available to the public through the Environmental Quality webpage (webpage is proposed as part of Action CN-1.10). Once the data is gathered and mapped, funds and effort resulting from Action CM-3.6 to create a program to expand fresh and healthy food options in the City can be tailored and targeted to any areas that may develop into food deserts over time.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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7	Suggested Policy Change: Policy EP-3.3: Mitigate Impacts - Promote the development of sustainable and equitable new land use plans that proactively reduces negative impacts on existing residents and businesses and avoids negative impacts on environmental justice communities, with an emphasis on public health.	Recommended Policy Change: EP-3.3: Mitigate Impacts. Promote the development of sustainable and equitable new land use plans that proactively reduce negative <u>health and economic</u> impacts on existing residents and businesses, <u>especially in environmental justice communities.</u>	Policy has been modified to emphasize health and economic impacts to environmental justice communities.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
8	Suggested Policy Change: Policy M-1.7: Proactive Mitigation - Proactively mitigate potential air quality, noise, congestion, safety, and other impacts from the transportation network on residents and business, preventing new or increasing negative impacts on environmental justice communities. Proactively reduce potential and maintain preparedness for hazardous chemical releases from mobile sources.	Recommended Policy Change: M-1.7: Proactive Mitigation. Proactively mitigate <u>existing and new</u> potential air quality, noise, congestion, safety, and other impacts from the transportation network on residents and business, <u>especially in environmental justice communities.</u>	Policy has been revised to clarify that it will apply to existing and new potential impacts and place greater emphasize on environmental justice communities. Maintaining preparedness for hazardous chemical releases and other emergencies is already addressed in the draft General Plan through draft Action S-1.8 Hazard Mitigation Plan, which requires the City to prepare a plan for such events and to update it so it addresses changing conditions every two to three years.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
8.2	Suggested Policy Change: Policy M-4.9: Air Pollution Mitigation - Consider Use land use, building, site planning, and technology solutions to mitigate exposure to transportation-related air pollution, especially in environmental justice focus areas.	Recommended Policy Change: Policy M-4.9: Air Pollution Mitigation - Consider <u>Utilize</u> land use, building, site planning, and technology solutions to mitigate exposure to transportation-related air pollution, <u>especially in environmental justice focus areas.</u>	Community comment is noted and has been included in the revised proposed policy.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
9	Suggested Policy Change: Policy PS-2.11: Resilient Facilities And Infrastructure - Coordinate with utilities and public agencies to develop, maintain, relocate, and/or upgrade critical local and regional public facilities and infrastructure systems to ensure their resiliency during times of extreme weather, toxic emission , or natural disasters. Develop and educate vulnerable communities about hazard response plans, resources, and best practices for maintaining health. Ensure that emergency plans (including communication plans) are robust and up-to-date.	1) Recommended Policy Change: PS-2.11: Resilient Facilities and Infrastructure. Coordinate with utilities and public agencies to develop, maintain, relocate, and/or upgrade critical local and regional public facilities and infrastructure systems to ensure their resiliency during times of extreme weather, natural disasters, <u>or toxic emission release.</u> 2) Recommended Action Change: S-1.11: Public Education. Continue to disseminate information on flooding, flood control on private property, floodplains, and flood preparedness, <u>man made hazards, hazard response plans, resources, and best practices in disaster events</u> to the public through the City website, social media, and at City offices.	The community comment is covered in two separate areas of the existing draft General Plan. As noted, the comment has been incorporated to be fully addressed between recommended changes to Policy PS-2.11 and Action S-1.11.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
10	Suggested Action Change: Action PS-2.5: Crime Data -Explore options for making crime, and environmental pollution violation data publicly available through the City's website.	Existing Action: CN-1.10: Interagency Team. Establish an environmental quality interagency team to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas. Publish results and information on the City's website through a dedicated Santa Ana Environmental Quality webpage.	Action PS-2.5 is specific to crime data. The proposed added language is not appropriate. Bringing environmental violations to the forefront is already covered under other actions, such as CN-1.5 and CN-1.10, which aim to monitor permits and violations and share environmental justice related information through the creation of a dedicated Santa Ana Environmental Quality webpage.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
11	Suggested Action Change: Action PS-3.15: Agenda Management - Consider enhancements to the agenda management system to ensure public meetings run smoothly, proactively and meaningfully engage residents in decisions that impact their neighborhoods , increase internal efficiency, document decisions proficiently, and maintain public transparency.	1) Existing Action: PS-3.15: Agenda Management. Consider enhancements to the agenda management system to ensure public meetings run smoothly, increase internal efficiency, document decisions proficiently, and maintain public transparency. 2) Recommended Action Change: CM-1.2: Community Conversation. Plan for and conduct a community survey every <u>two years</u> related to community health, <u>pollution</u> concerns, parks, <u>community engagement</u> , community service needs, with focused outreach to environmental justice priority areas <u>utilizing various platforms, such as social media and school events, to encourage substantial survey participation.</u>	Existing Action PS-3.15, with target implementation year of 2022, will consider further enhancements to address City meeting agenda and related public engagement. In addition, Action CM-1.2 provides for a survey tool as an opportunity for community input on best practices for residents to engage in City meetings, workshops, and the decision making process.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
12	Suggested Policy Change: CN-1.1: Regional Planning Efforts - Coordinate air quality planning efforts with local and regional agencies to meet or exceed State and Federal ambient air quality standards in order to educate the community on and protect all residents from the health effects of air pollution.	Recommended Policy Change: CN-1.1: Regional Planning Efforts. Coordinate air quality planning efforts with local and regional agencies to meet <u>or exceed</u> state and federal ambient air quality standards in order to <u>educate the community on and</u> protect all residents from the health effects of air pollution.	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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13	Suggested Policy Change: Policy CN-1.5: Sensitive Receptor Decisions - Consider-Test, monitor, and mitigate potential impacts of stationary and nonstationary emission sources on existing and proposed sensitive uses and opportunities to minimize health and safety risks. Develop and adopt new regulations on avoiding the siting of facilities that might significantly increase pollution near sensitive receptors within environmental justice area boundaries. Provide residents within the range of stationary and nonstationary emission source informative and educational resources and best practices to maintain health and mitigate public health risks.	Recommended Policy Change: CN-1.5: Sensitive Receptor Decisions. <u>Study the</u> impacts of stationary and nonstationary emission sources on existing and proposed sensitive uses and opportunities to minimize health and safety risks. Develop and adopt new regulations <u>avoiding</u> the siting of facilities that <u>potentially emit increased pollution near</u> sensitive receptors within environmental justice area boundaries.	Policy has been revised to specify the need to study impacts of emission sources on existing and proposed sensitive uses so that data collected can inform future regulations to avoid siting of facilities that potentially emit increased pollution near sensitive receptors in environmental justice areas. The City is not the appropriate agency to regulate, test, monitor or mitigate stationary and nonstationary sources. By partnering with regulating agencies the City can facilitate such agencies to identify, monitor, and address air quality and other hazards. Comment to provide residents information related to emissions is already covered in proposed actions CN-1.5 and CN-1.11 as is making such data available to the public through the Environmental Quality webpage (webpage is proposed as part of Action CN-1.10).	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
14	Suggested Action Change: OS-1.1: Park Needs Assessment And Master Plan - Create, adopt, and implement a park needs assessment and master plan defining park service areas according to best practices, establishing a service area for each park facility, creating a tool to evaluate needs and prioritize improvements by quadrant or appropriate geographic subarea, and maintaining a list of priorities, created and led by community input , for the expansion and improvement of open space and recreational facilities in each quadrant or geographic subarea to attain a park land standard of 4 2 acres per 1,000 residents.	Recommended Action Change: OS-1.1: Park Needs Assessment and Master Plan. Create, adopt, and implement a park needs assessment and master plan, <u>based on community input</u> , defining park service areas according to best practices, establishing a service area for each park facility, creating a tool to evaluate needs and prioritize improvements by quadrant or appropriate geographic subarea, and maintaining a list of priorities for the expansion and improvement of open space and recreational facilities in each quadrant or geographic subarea to attain a park land standard of <u>3</u> acres per 1,000 residents.	The community comment to increase the ratio in acres per 1,000 residents is in alignment with comments provided members of City Council. Policy has been revised to increase the ratio to three (3) acres per 1,000 residents. A member of MPNA advocated to increase park ratio to 4 acres per 1,000 residents during March 28, 2022 roundtable. Staff recommends no further revisions based on comment.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
15	Suggested Policy Change: Policy S-2.1: Regional Collaboration - Consult and collaborate with federal, state, and regional agencies to identify and regulate the <u>use, storage, and</u> disposal and storage of hazardous materials, prevent the illegal transportation and disposal of hazardous waste, and facilitate the cleanup of contaminated sites, and prepare for possible hazardous chemical releases in workplaces and into the community. Promote transparency and accountability by informing local emergency response personnel and impacted communities about hazardous chemical use, disposal or cleanup near them, ensuring that emergency personnel and communities both have plans for dealing with worse-case scenarios.	Recommended Policy Change: S-2.1: Regional Collaboration. Consult and collaborate with federal, state, and regional agencies to identify and regulate the <u>use, storage, and</u> disposal of hazardous materials, prevent the illegal transportation and disposal of hazardous waste, and facilitate the cleanup of contaminated sites.	Policy has been revised to reflect the spirit of the suggested edits, however, the proposed language changes at end of the draft policy is not recommended. Emergency preparedness for hazards already covered through the Hazard Mitigation Plan (see Action S-1.8 Hazard Mitigation Plan) and workplace safety measures are outside of the City's purview and is regulated by Cal/OSHA.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
16	Suggested Policy Change: Policy S-2.2: Hazardous Waste Generators - Collaborate with appropriate agencies to identify and inventory all users and handlers of hazardous materials to proactively mitigate potential impacts. Promote transparency and accountability by publishing data on toxic spills, water pollution, illegal discharges, industrial and commercial air violations, maintain and publish statistics related to complaints and violations the City receives from residents or community advocates regarding Industrial Violations and hazardous waste generators.	Recommended Policy Change: S-2.2: Hazardous Waste Generators. Collaborate with appropriate agencies to identify and inventory all users and handlers of hazardous materials to proactively mitigate potential impacts. <u>Promote transparency and accountability by publishing city, regional, and state data and resources on toxic spills, water pollution, illegal discharges, industrial and commercial air violations on a dedicated Santa Ana Environmental Quality webpage.</u>	Policy has been revised to reflect the spirit of the suggested edits.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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17	Suggested Policy Change: Policy S-2.4: Planning and Remediation - Determine the presence of hazardous materials and/or waste contamination prior to approval of new uses and require that appropriate measures be taken to protect the health and safety of site users and the community. Study and provide annual statistics for public health outcomes in environmental justice areas potentially impacted by pollution as a baseline. Create goals to continuously improve public health outcomes related to environmental hazards based on established baseline levels.	1) Existing Action: CM-3.3: Health Metrics. Engage with the Orange County Health Care Agency and other stakeholders to monitor key health indicators to measure the success of the outcome of General Plan policies and the implementation plan, including reduction in incidence in asthma and low birth weight of infants. 2) Recommended Action Change: LU-3.26: Health Conditions. <u>Work with state agencies including Department of Toxic Substances Control and South Coast Air Quality Management District, Orange County Health Care Agency, and local stakeholders including Orange County Environmental Justice and UC Irvine Public Health to identify baseline conditions for lead soil and air contamination in Santa Ana, routinely monitor indicators of lead such contamination, and measure positive outcomes. Collaborate with these organizations to secure grant funds for soil and air testing, remediation (e.g., bioremediation, covering, removing, air filtration), and prevention activities for residential properties in proximity to sites identified with high-soil-lead levels of soil pollution (including sites identified with soil lead levels of 80 ppm or higher), and air pollution, with a focus on communities disproportionately affected by soil contamination.</u>	The community comment is already addressed through proposed Action CM-3.3 and recommended changes to proposed Action LU-3.26. Per March 28, 2022 roundtable, new revisions related to soil and air included in response to MPNA comments to broaden collection of baseline conditions. Reference to 80 ppm added in response to OCEJ comments in context of pursuing grant funding.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
18	Suggested Policy Change: Policy S-2.5: Education and Best Practices - Promote public awareness of best practices for and participation in household hazardous waste management and disposal. Designate an online informational resource for residents and community members to educate themselves on the hazards of potential pollution exposure from residential, commercial, or industrial violations.	Existing Action: CN-1.10: Interagency Team. Establish an environmental quality interagency team to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas. Publish results and information on the City's website through a dedicated Santa Ana Environmental Quality webpage.	The community comment is already addressed through Action CN-1.10, which will create the Environmental Quality webpage (webpage is proposed as part of Action CN-1.10) where reports, data, maps, and other resources will be made publicly accessible.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
19	Suggested Policy Change: Policy S-3.4: Multiagency Education Campaign - Develop cooperative partnerships and strengthen communication among public agencies, residents, nonprofit organizations, community groups , and businesses to promote sharing of educational information regarding seismic and geologic hazards and safety.	Recommended Policy Change: S-3.4: Multiagency Education Campaign. Develop cooperative partnerships and strengthen communication among public agencies, residents, nonprofit organizations, community groups , and businesses to promote sharing of educational information regarding seismic and geologic hazards and safety.	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
20	Suggested Policy Change: Policy LU-3.11: Air Pollution Buffers - Promote landscaping and other buffers to separate existing sensitive uses by at least a distance of 1,000 feet from rail lines, heavy industrial facilities, and other emissions sources. As feasible, Apply more substantial buffers within environmental justice area boundaries. Collaborate with the rail companies to renovate the walls between communities and rail lines that provide the maximum protection for the community and public health. Develop strategies to reduce air and noise pollution.	1) Recommended Policy Change: LU-3.11: Air Pollution Buffers. <u>Work with the Environmental Justice Action Committee to develop and implement landscaping and other local land use and zoning buffer strategies, guided by the California Air Resources Board and the Southern California Air Quality Management District best practices,</u> to separate existing sensitive uses from rail lines, heavy industrial facilities, and other emissions sources. As feasible, apply more substantial buffers within environmental justice area boundaries. 2) Recommended New Action: <u>LU-4.9: Collaborate with rail road right-of-way owners and operators to renovate the walls between communities and rail lines that provide the maximum protection for the community and public health, including strategies to reduce air and noise pollution.</u>	Policy has been revised to indicate that landscape buffer will be implemented. The actual distance will not be included until such time that analysis proposed under Action LU-3.2 to conduct a study to evaluate, inform, and establish appropriate minimum distances is completed. Including a distance before such study is complete would not take local conditions into account and would be arbitrary. New Action LU-4.9. is proposed to address rail lines. Including a buffer stated as priority by members of MPNA. Staff recommends changes to policy based on March 28, 2022 and subsequent roundtables.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
21	Suggested Action Change: Action CM-3.8 - Environmental Soil And Human Health Screening. Collaborate with Orange County Health Care Agency and local stakeholders, such as Orange County Environmental Justice and UC Irvine Public Health, in efforts to provide increased healthcare services (i.e., blood lead testing, treatment) for residents of environmental justice communities, including undocumented, uninsured, and under-insured residents living in neighborhoods impacted by soil lead contamination and to agree upon locally acceptable and enforceable safety thresholds for lead exposure and contamination. Additionally, collaborate to advocate for adjust ment of the County and State policies for health and environmental screening levels to promote healthy outcomes related to lead contamination as recommended by health experts.	Recommended Action Change: CM-3.8: Environmental Soil <u>and Human Health Screening.</u> Collaborate with Orange County Health Care Agency and local stakeholders, such as Orange County Environmental Justice and UC Irvine Public Health, in efforts <u>to provide increased healthcare services (i.e., blood lead testing, treatment) for residents, especially those that reside in environmental justice communities. Additionally, collaborate to advocate for</u> adjustment of the County and State policies for health and environmental screening levels to promote healthy outcomes related to lead contamination as recommended by health experts.	Action has been modified to reflect the spirit of the comment and to be inclusive of all persons residing in Santa Ana regardless of group affiliation, legal status, or insurance type or lack there of. Additionally, Orange County Health Care Agency (OCHCA) programs do not make a distinction of anyone's legal or insurance status when providing services related to lead.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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22	Suggested Agency/Time Frame Change: PBA / 2022 Ongoing	Recommended Agency/Time Frame Change: PBA / <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
23	Suggested Action Change: Action CN-1.10: Interagency Team Environmental Justice Office. Establish an environmental quality interagency team justice office with at least one public health expert on staff to ensure community capacity to play a leadership role in implementation of policy, implementation, and decisions involving environmental quality and environmental justice issues; to coordinate across agencies to implement environmental justice aspects of the General Plan and to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas; P ublish results and information on the City’s website through a dedicated Santa Ana Environmental Quality web page.	Recommended New Action: CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and <u>Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input. Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
24	Suggested Action Change: Action CN-1.11: Public Education - Augment existing outreach programs to improve public awareness of State, regional and local agencies’ roles and resources to identify, monitor, and address air quality and other environmental hazards in the community; provide regular reports to residents and environmental justice stakeholders that identify air quality and other environmental hazards as well as strategies for risk mitigation; provide accessible reporting tools and facilitate quarterly forums for community members to raise concerns about heretofore unidentified environmental health issues and environmental hazards in their neighborhoods.	Existing Action: CN-1.10: Interagency Team. Establish an environmental quality interagency team to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas. Publish results and information on the City’s website through a dedicated Santa Ana Environmental Quality webpage.	Community comment is already addressed through proposed Action CN-1.10 which will create the Environmental Quality webpage portal to publish data, maps, and resources.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
25	Suggested Action Change: Action CN-1.13: Community Survey On Health Lifestyles - Plan for and conduct a community survey of residents related to community health, air quality, parks, and community services; with focused outreach for environment justice concerns and priority areas (tie into other City efforts like Strategic Plan, park and recreation planning, community benefits, etc.). Report findings to surveyed communities, and collaborate with residents and community stakeholders to shape policy and implement environmental and public health interventions to address issues identified through the survey.	Recommended Action Change: CN-1.13: Community Survey On Health Lifestyles. Plan for and conduct a community survey of residents every two years related to community health, pollution , parks, community engagement , and community services; with focused outreach for environment justice concerns and priority areas. <u>Report findings of survey through the various media platforms and utilize input to inform periodic evaluation and update of General Plan.</u>	Action has been revised to address the spirit of the suggestions. Through actions such as CN-1.10, results of surveys, analysis, and outcomes will be publicly accessible through the Environmental Quality webpage.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
26	Suggested Agency/Time Frame Change: CMO / 2022 Ongoing	Recommended Agency/Time Frame Change: CMO / <u>Every Two Years</u>	The timeframe has be modified to correlate with the survey proposed to take place every two years (Action CM-1.2).	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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27	Suggested Action Change: Action CN-1.14: Expanded Interactions - Identify opportunities to expand regular attendance of Conduct regular meetings organized by City staff to be attended regularly by City staff and decision-makers in neighborhoods within environmental justice area boundaries, so that residents, community organizations , and businesses can more easily communicate their unique issues and needs, as well as their recommendations on how best to implement environmental quality, environmental health, and environmental justice policies. Include a translator(s) language interpreter(s) at these meetings so that all residents can engage. Ensure that these meetings bring together residents and multiple community-based organizations whose work focuses on environmental justice.	Recommended Action Change: CN-1.14: Expanded Interactions. Identify opportunities to expand attendance and support neighborhood associations and <u>community groups to hold regular meetings with</u> City staff and decision-makers in neighborhoods within environmental justice <u>communities</u> , so that residents, <u>community organizations</u> , and businesses can communicate their unique issues and needs, <u>as well as their recommendations on how best to implement environmental quality, environmental health, and environmental justice</u> policies. Arrange for <u>language interpretation services as needed</u> at these meetings so that all residents can <u>participate</u> .	Action has been modified to reflect the spirit of the edits.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
28	Add Action: Action CN-2.6: Lead Contamination - Work with local and regional partners, such as Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with such local and regional partners and environmental justice stakeholders in proposing, selecting, and implementing solutions to mitigate (i.e., remove, cover, and remediate) hazardous lead-contaminated soils in the city in a manner that includes benchmarks (including but not limited to time benchmarks) and routine monitoring of soil lead levels to measure and track effectiveness of selected programs.	Recommended Action Change: S-2.4: Lead Contamination. Work with <u>state, local and regional partners, such as the Department of Toxic Substances Control, South Coast Air Quality District, Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with such state agencies, local and regional partners and environmental justice stakeholders in proposing, selecting, and implementing measures to mitigate (i.e., remove, cover, and remediate) hazardous lead-contaminated soils in the city in a manner that includes key benchmarks and routine monitoring of soil lead levels to measure and track effectiveness of selected approach.</u>	Action addressing lead contamination already exists in the Safety Element (S-2.4) and duplication is not necessary.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
29	Add Agency/Time Frame Change: PBA / Ongoing	N/A		Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
30	Suggested Action Change: Action CN-2.4: Preservation Of Natural And Historic Resources - Collaborate with local indigenous tribes (specifically the Acjachemen and Tongva tribes) to identify, protect, and enhance natural and historic resources across Santa Ana; Identify and evaluate potential incentives in the municipal code to encourage protection and enhancement of natural and historic resources.	Recommended Action Change: CN-2.4: Preservation of Natural and Historic Resources. <u>Collaborate with local indigenous tribes and other stakeholders to identify and evaluate</u> potential incentives in the municipal code to encourage protection and enhancement of natural and historic resources.	Action has been modified to address community comment within a framework that complies with laws related to property rights.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
31	Suggested Agency/Time Frame Change: PBA / 2022 Ongoing	Suggested Agency/Time Frame Change: PBA / <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
32	Suggested Action Change: Action S-2.4: Lead Contamination - Work with local and regional partners, such as Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with such local and regional partners and environmental justice stakeholders in proposing, selecting, and implementing solutions to mitigate (i.e., remove, cover, and remediate) hazardous lead-contaminated soils in the city and with in a manner that includes benchmarks (including but not limited to time benchmarks) and routine monitoring of soil lead levels to measure and track effectiveness of selected programs.	Recommended Action Change: S-2.4: Lead Contamination. Work with <u>state</u> , local and regional partners, such as <u>the Department of Toxic Substances Control, South Coast Air Quality District, Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health</u> , to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with <u>such state agencies, local and regional partners and</u> environmental justice stakeholders in proposing, <u>selecting, and implementing measures to mitigate (i.e., remove, cover, and remediate)</u> hazardous lead-contaminated soils in the city <u>in a manner that includes key benchmarks and routine monitoring of soil lead levels</u> to measure and track effectiveness of <u>selected approach</u> .	Action has been modified to address community comment.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
33	Suggested Agency/Time Frame Change: PBA & CDA / 2022 Ongoing	Suggested Agency/Time Frame Change: PBA & CDA / <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
34	Suggested Action Change: Action LU-3.6: Lead Paint Abatement - Coordinate with County of Orange Health Care Agency and community organizations to strengthen local programs and initiatives to eliminate lead-based paint hazards, with priority given to residential buildings located within environmental justice area boundaries. Pursue funding to establish programs to assist low-income property owners in covering the cost of lead paint abatement, as well as programs to assist rental property owners in covering the cost of temporary lodging for tenants who must leave their homes during lead paint abatement.	Recommended Action Change: LU-3.26: Health Conditions. Work with <u>state agencies including Department of Toxic Substances Control and South Coast Air Quality Management District</u> , Orange County Health Care Agency, and local stakeholders including Orange County Environmental Justice and UC Irvine Public Health to identify baseline conditions for lead soil and lead contamination in Santa Ana, <u>routinely</u> monitor indicators of lead <u>such</u> contamination, and measure positive outcomes. Collaborate with these organizations to secure grant funds for soil <u>and air</u> testing, remediation (<u>e.g., bioremediation, covering, removing, air filtration</u>), and <u>prevention activities</u> for residential properties in proximity to sites identified with high soil lead levels <u>of soil pollution (including sites identified with soil lead levels of 80 ppm or higher), and air pollution</u> , with a focus on <u>communities disproportionately affected by soil contamination</u> .	Community comment to pursue funding for lead paint abatement is already addressed in proposed Action LU-3.26, and in the draft Housing Element. Funding to assist low-income property owners is included in Proposed Action in Housing Element: HE-1 Single-Family Home Rehabilitation: Provide grants of up to \$25,000 for the repair and rehabilitation of single-family homes, prioritizing applicants in R/ECAP and TCAC census tracts, and low-income households. Seek to augment funding and program reach by tracking and applying for grants as opportunities arise. Proposed Action in Housing Element: HE-2 Mobile Home Repair: Provide grants of up to \$25,000 for the repair and rehabilitation of mobile homes, prioritizing applicants in R/ECAP and TCAC census tracts, low-income households, and seniors. Seek to augment funding and program reach by tracking and applying for grants as opportunities arise. Proposed Action in Housing Element: HE-3 Multiple-Family Rental Rehabilitation: Provide low-interest loans to assist in the rehabilitation of rental properties occupied by low-income and family households, prioritizing applicants in R/ECAP and TCAC census tracts. Seek to augment funding and program reach by tracking and applying for grants as opportunities arise. Per March 28, 2022 roundtable, new revisions related to soil and air included in response to MPNA comments to broaden collection of baseline conditions. Reference to 80 ppm added in response to OCEJ comments in context of pursuing grant funding.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
35	Suggested Agency/Time Frame Change: CDA / 2021 Ongoing	Recommended Agency/Time Frame Change: CDA / <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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36	Add Action: Action LU-3.XX: Protect Worker's Health During Lead Paint Abatement. Provide appropriate protective gear and equipment for workers certified as lead renovators when conducting renovation activities. Ensure that trained workers have reasonable workloads and time frames for completion of renovation activities.	N/A	Workplace safety is already regulated by Cal/OSHA and is outside of the City's regulatory authority.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
37	Add Agency/Time Frame Change: PBA & CDA / Ongoing	N/A	N/A	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
38	Suggested Action Change: Action LU-3.18: Renovations and Lead Prevention - Evaluate the feasibility of requiring Require contractor training and/or certification for safe work practices to conduct residential renovations for pre-1978 structures that may contain existing lead paint. When conducting lead paint abatement, ensure that workers have proper physical protections; safeguard other areas of the abated building or residence from lead or other toxins that may be res-suspended in the air, soil, and dust; provide support for temporary relocation of residents during abatement process; and monitor lead levels for workers, residents, and the indoor and outdoor environment of the residence that was abated.	N/A	Workplace safety is already regulated by Cal/OSHA and is outside of the City's regulatory authority.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
39	Suggested Agency/Time Frame Change: PBA & CDA / 2022 Ongoing	N/A	N/A	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
40	Suggested Action Change: LU-3.19: Promote Health - Partner with local organizations (e.g., OC Health Care Agency, Latino Health Access, Santa Ana Unified School District, Orange County Environmental Justice , and the Coalition of Community Health Centers) to increase blood lead testing, outreach, education, and referral services through a 'promotora' or community peer outreach model that addresses the root causes of elevated blood lead levels impacting Santa Ana residents, with special focus in environmental justice communities and for children living in pre-1978 housing. Through the promotora program, inform residents of their test results, and coordinate with these organizations and other community health providers to ensure residents exposed to lead have access to comprehensive health care services.	Recommended Action Change: LU-3.19: Promote Health. Partner with local organizations (e.g., OC Health Care Agency, Latino Health Access, Santa Ana Unified School District, <u>Garden Grove Unified School District</u> , <u>Orange County Environmental Justice</u> , and the Coalition of Community Health Centers) to increase blood lead testing, outreach, education, and referral services through a 'promotora' or community peer outreach model that addresses the root causes of elevated blood lead levels impacting Santa Ana residents, with special focus in environmental justice communities and for children living in pre-1978 housing.	Action has been modified to include additional groups such as OCEJ and Garden Grove School District. Specific program information and approach changes overtime and can be addressed through program development and implementation.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
41	Suggested Agency/Time Frame Change: PBA / 2022 Ongoing	Suggested Agency/Time Frame Change: PBA / <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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42	Suggested Action Change: Action LU-3.21: Prevention Education - Collaborate with local organizations such as Orange County Health Care Agency and State Environmental Protection Agency and community-based environmental justice organizations and identify funds to create a Santa Ana Prevent Lead Poisoning Education Program, with special focus on disadvantaged communities and pre-1978 housing stock. Implement mechanisms for local community-based environmental justice organizations to guide the Santa Ana Prevent Lead Poisoning Education Program and provide annual reports regarding fund activities and allocation of resources.	Recommended Action Change: LU-3.21: Prevention Education. Collaborate with local organizations such as Orange County Health Care Agency, State Environmental Protection Agency, <u>and community-based environmental justice organizations to identify funds and</u> create a Santa Ana Prevent Lead Poisoning Education Program, with special focus on disadvantaged communities and pre-1978 housing stock.	Action has been modified to reflect community comment. Specific program information and approach changes overtime and can be addressed through program development and implementation.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
43	Suggested Agency/Time Frame Change: PBA / 2022 Ongoing	Recommended Agency/Time Frame Change: PBA / <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
44	Suggested Action Change: Action LU-3.22: Public Health Outcomes - Support the Orange County Health Care Agency in their role in investigating public complaints regarding lead hazards, through investigation of resident-identified concerns and enforcement of local housing and soil standards to assure healthy outcomes, including for individuals and households presenting with concerns about lead exposures and/or with confirmed blood lead levels of >3.5ug/dL, which the Centers for Disease Control and Prevention indicates as the threshold for follow-up and case management.	Recommended Action Change: LU-3.22: Public Health Outcomes. Support the Orange County Health Care Agency in their role in investigating public complaints regarding <u>unsafe lead work practices and lead hazards wherein children are present</u> , through enforcement of local housing standards to assure healthy outcomes <u>including for individuals and households presenting with concerns about lead exposure and/or with confirmed lead levels of >3.5 ug/dL, which the Centers for Disease Control and Prevention indicates as the threshold for follow-up and case management in children.</u>	Action has been modified to reflect community comment.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
45	Suggested Agency/Time Frame Change: PBA / 2021 2022 & Ongoing	Recommended Agency/Time Frame Change: PBA / <u>2022</u> & Ongoing		Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
46	Suggested Action Change: Action LU-3.25: Engage EJ Communities: Work with community serving organizations, neighborhood leaders, and residents to form a Environmental Justice Office with at least one public health expert staff Ad Hoc Committee to develop ongoing EJ Community Engagement programs for existing and new disadvantaged EJ communities, including multilingual communication protocols. Host biannual or quarterly Roundtable meetings with local stakeholders to guide and evaluate implementation of environmental justice policies and the environmental justice-related roles and responsibilities of any potential Public Health Director or Public Health Department.	Recommended New Action: <u>CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input. Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
47	Suggested Agency/Time Frame Change: PBA / 2022 Ongoing	Recommended Agency/Time Frame: CMO/PBA / <u>2022</u>		Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
48	Suggested Action Change: Action LU-3.26: Health Conditions - Work with Orange County Health Care Agency and local stakeholders including Orange County Environmental Justice and UC Irvine Public Health to identify baseline conditions for lead contamination in Santa Ana, routinely monitor indicators of lead contamination, and measure positive outcomes. Collaborate with these organizations to secure grant funds for soil testing, and remediation (e.g., bioremediation, covering, removing), and prevention activities for residential properties in proximity to sites identified with high soil lead levels of 80 ppm or higher, with a focus on Environmental Justice census tracts communities disproportionately affected by soil contamination and other forms of environmental burden. Publicly report findings from regular monitoring of soil lead levels and remediation and prevention activities.	Recommended Action Change: LU-3.26: Health Conditions. Work with <u>state agencies including Department of Toxic Substances Control and South Coast Air Quality Management District</u> , Orange County Health Care Agency, and local stakeholders including Orange County Environmental Justice and UC Irvine Public Health to identify baseline conditions for lead <u>soil and air</u> contamination in Santa Ana, <u>routinely</u> monitor indicators of lead <u>such</u> contamination, and measure positive outcomes. Collaborate with these organizations to secure grant funds for soil <u>and air</u> testing, remediation (e.g., bioremediation, covering, removing, air filtration) and <u>prevention activities</u> for residential properties in proximity to sites identified with high soil lead levels of soil pollution (including sites identified with soil lead levels of 80 ppm or higher), and <u>pollution</u> , with a focus on <u>communities disproportionately affected by soil contamination.</u>	Action has been modified to address frequency of soil monitoring, examples of remediation and emphasis on communities disproportionately affected by soil contamination. Actionable thresholds are legally established by state and federal agencies. Public reporting of findings and resources related to soil contamination, pollution, and environmental justice is already addressed in Action CN-1.10, which aims to share environmental justice related information through the creation a dedicated Santa Ana Environmental Quality webpage. Per March 28, 2022 roundtable, new revisions related to soil and air included in response to MPNA comments to broaden collection of baseline conditions. Reference to 80 ppm added in response to OCEJ comments in context of pursuing grant funding.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
49	Suggested Agency/Time Frame Change: PBA / 2022-Ongoing	Recommended Agency/Time Frame Change: PBA / <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
50	Suggested Action Change: Action LU-3.28: Tenant Protections - Provide tenant protections for renters living in low- and moderate-income census tracts (or households), as defined by HUD, where environmental hazards such as lead contamination have been discovered. Tenant protections include rent control and protection against unjust evictions and will continue during and following remediation of lead contamination. Provide information to residential tenants regarding Landlord Tenant Laws in the State, such as AB 1481, that provide protections against evictions for those who seek action to improve substandard housing and hazardous conditions.	Recommended Action Change: LU-3.28: Tenant Protections. Provide information to residential tenants regarding Landlord Tenant Laws in the State, such as AB 1481, <u>and Santa Ana's Just Cause For Tenant Eviction and Rent Stabilization ordinances</u> that provide protections against evictions for those who seek action to improve substandard housing and hazardous conditions.	Tenant protections are addressed by state law, and the City of Santa Ana has taken additional steps to ensure tenants are protected through its Just Cause Eviction and Rent Stabilization ordinances. Additionally, Action HE-52 in the proposed Housing Element Update includes holding annual small apartment managers’ workshop to train and educate property owners, HOAs, property managers, and tenants of best practices in property management, neighborhood safety, and landlord/tenant responsibilities; and partnering with legal assistance organizations to provide legal clinics for tenants on tenants’ rights and recourse for intimidation and unjust evictions. Together, the proposed actions already in the drafts will provide the protections being suggested.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
51	Suggested Action Change: Action LU-3.29: Development Site History - Update the City’s Development Review application process to require developers to provide information regarding the prior use of the site and history of hazardous materials on the property, in order to identify potential for site contamination from hazardous materials or soil lead contamination to be remediated. Make development site history publicly accessible.	N/A	Making development project related documents public is vital to maintaining a transparent development process. As such, this is already required by the City's Sunshine Ordinance. Development projects are required to create project specific webpages where plans, reports, and renderings are published and available for public review. If the draft General Plan Update is approved and development site history reports are required, reports generated will be posted to the project webpage like the other documents. Suggested language is not needed as making such data publicly available is already required.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
52	Suggested Action Change: Action LU-4.3: Public Improvements In Activity Nodes And Focus Area - Create a public realm plan for each activity node and focus area to establish a unified vision for long-term improvements to streets, sidewalks, plazas, other public spaces, and placemaking elements. Identify soil contamination reduction opportunities and other public improvement priorities and pilot projects for each focus area. [Sic] Program priority improvements and pilot projects into the City's Capital Improvement Program.	Recommended Action Change: LU-4.3: Public Improvements in Activity Nodes and Focus Area. Create a public realm plan for each activity node and focus area to establish a unified vision for long-term improvements to streets, sidewalks, plazas, other public spaces, and placemaking elements. Identify public improvement priorities and pilot projects for each focus area <u>and include them in the City's Capital Improvement Program.</u> Program priority improvements and pilot projects into the City's Capital Improvement Program	Soil contamination reduction is an important issue facing Santa Ana communities. As such, there are numerous policies and actions specific to that issue. Augmenting soil contamination to this action, which is to formulate a vision and plan for public improvements at activity nodes, is not germane or necessary. Action has been modified for clarity.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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53	Suggested Agency/Time Frame Change: PBA / 2022 & Ongoing	Suggested Agency/Time Frame Change: PBA / 2022 & Ongoing	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
54	Suggested Action Change: Action LU-4.7: Construction Improvements - Identify best practices and communication tools to reduce soil contamination and monitor mitigation measures and oversight of private and public construction improvements to protect the health and safety of workers , the community, and the soil , with focus on environmental justice areas.	N/A	The suggested edits pertaining to soil contamination and worker safety are not germane to the nature of this policy. Soil issues are exhaustively covered in draft policies and actions of the Plan (example actions include S-2.4, LU-3.6, LU-3.17, LU-3.18, LU-3.19, LU-3.20, LU-3.21, LU-3.22, LU-3.24, LU-3.26, LU-3.29, and CM-3.8) and worker safety is covered and enforced by Cal/OSHA. The Policy was specifically drafted to ensure identification and implementation of best construction practices as a component of the CEQA review and implementation process.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
55	Suggested Action Change: Action HP-1.5: Historic Design Standards - Update historic design standards for preserving historic setting and context, incorporating best practices related to landscape design, front yard fences, other property features, and remediation of lead-based paint and lead-contaminated soil.	N/A	Action HP-1.5 is strictly related to design. While lead contamination is an important issue facing Santa Ana communities, it is not germane to this actions and is already being addressed through other policies and actions such as action LU-3.6 Lead Paint Abatement and action S-2.4 Lead Contamination.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
56	Suggested Action Change: Action HP-1.6: Historic Resources Survey - Survey all City-owned historic resources to identify condition, maintenance and repair needs, and sources of funding for upgrades. Consult with local indigenous tribes (Juaneño/Acjachemen and Gabrieleño/Tongva) to identify sites of cultural, spiritual, and/or historical significance to their tribes, and work with them to preserve and/or restore these sites. Work with local tribes to hear and implement proposals to ensure continued indigenous access and custodianship of these sites.	Recommended New Action: HP-2.7: <u>Native American Cultural Significance. Consult with affiliated tribes listed with the California Native American Heritage Commission to identify sites of cultural, spiritual, and/or historical significance to their tribes, and work with them to preserve, restore or celebrate these sites, where feasible.</u>	A new action has been added in the Historic Preservation element to address community comment.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
57	Suggested Agency/Time Frame Change: PRCSA & PWA / 2022 & Ongoing	Recommended Agency/Time Frame Change: PBA / <u>2023 & Ongoing</u>		Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
58	Suggested Action Change: Action HP-1.7: Oral History - Seek funding to reinstate local oral history program to capture Santa Ana’s historic and cultural narrative. Work with local tribes (Juaneño/Acjachemen and Gabrieleño/Tongva) to contribute knowledge on indigenous history (pre-colonization to present) to the oral history program.	N/A	Action HP-1.7 is meant to include all historic and cultural histories regardless of group affiliation, which includes indigenous tribes. Incorporating suggested language will narrow the focus of the action and not be as inclusive as intended.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
59	Suggested Action Change: Action HP-3.2: Historic Properties - Update and expand citywide Historic Properties Survey Program to identify potential historic resources for placement on local Register and those that are at risk of losing their historic value, with the first phase to include resource evaluation of the Focus Areas. Consult with local indigenous tribes (Juaneño/Acjachemen and Gabrieleño/Tongva) to identify sites of cultural, spiritual, and/or historical significance to their tribes, and work with them to preserve and/or restore these sites. Work with local tribes to hear and implement proposals to ensure continued indigenous access and custodianship of these sites.	Recommended New Action: HP-2.7: <u>Native American Cultural Significance. Consult with affiliated tribes listed with the California Native American Heritage Commission to identify sites of cultural, spiritual, and/or historical significance to their tribes, and work with them to preserve, restore or celebrate these sites, where feasible.</u>	A new action has been added in the Historic Preservation element to address community comment.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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60	Suggested Action Change: Action HP-3.3: Historical Places - Proactively nominate all properties that potentially qualify for placement on the Santa Ana Register of Historical Places. Consult with local indigenous tribes (Juaneño/Acjachemen and Gabrieleño/Tongva) to identify and nominate sites of cultural, spiritual, and/or historical significance to their tribes.	Recommended New Action: HP-2.7: <u>Native American Cultural Significance. Consult with affiliated tribes listed with the California Native American Heritage Commission to identify sites of cultural, spiritual, and/or historical significance to their tribes, and work with them to preserve, restore or celebrate these sites, where feasible.</u>	A new action has been added in the Historic Preservation element to address community comment.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
61	Suggested Action Change: Action HP-3.4: Community Engagement - Prepare a community engagement plan that targets communities with historic resources that have low participation rates in historic preservation programs. Prepare a specific community engagement plan focused on local indigenous tribes (Juaneño/Acjachemen and Gabrieleño/Tongva), their historic resources, and their efforts to preserve these resources.	Recommended Action Change: HP-3.4: Community Engagement. Prepare a community engagement plan that targets communities with historic resources that have low participation rates in historic preservation programs <u>including hard to reach communities and affiliated tribes listed with the California Native American Heritage Commission.</u>	Action has been modified to reflect the spirit of the community comment.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
62	Suggested Action Change: Action HP-3.6: Historic Resources Commission - Establish minimum qualifications for participation on the Historic Resources Commission. Include at least one Acjachemen/Juaneño elder/recognized culture keeper, and at least one Tongva/Gabireleño elder/recognized culture keeper on the Historic Resources Commission.	N/A	Historic Resources Commissioners are appointed by City Council with minimum qualifications enumerated in the SAMC. The Action as drafted provides a flexible but specific mandate requiring minimum qualifications germane to the Commission and can grow and change to reflect the values of the community.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
63	Suggested Action Change: Action HP-3.10: Public Awareness - Participate in and support efforts of preservation organizations, indigenous preservation organizations and tribes , and business groups to promote public awareness and educational opportunities that highlight historic preservation.	Recommended Action Change: HP-3.10: Public Awareness. Participate in and support efforts of preservation organizations, <u>affiliated tribes listed with the California Native American Heritage Commission</u> , and business groups to promote public awareness and educational opportunities that highlight historic preservation.	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
64	Establish an Environmental Justice Office to allow for ongoing accountability and collaboration between local residents, community organizations, and City staff	Recommended New Action: <u>CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input. Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
65	Improve alignment between Community Considerations, policy goals, and Implementation actions.	N/A	Policies and actions have been revised to reflect the latest round of community comments and considerations.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
66	Suggested Action Change: Action LU-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 benefits and enhances existing neighborhood character and identity.	Recommended Action Change: LU-1.2: Community Benefits. Require new development projects <u>proposing a zone change and/or general plan amendment to include as part of the development proposal, a community benefit and implementation plan providing a net community benefit as desired by the City and neighborhoods through public outreach. Example of community benefits may include, but is not limited to public realm improvements, dedication of park and open space for public use, expanded economic development opportunities, job opportunities, new community serving businesses and services, and removal of blight and incompatible land uses.</u> 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.	Creating community benefits through development is critical to realizing the vision developed by the community and included in the draft General Plan Update. As such, community benefits are being addressed through a two-facet approach. By right projects are subjected to established development impact fees and exactions used to benefit the community (i.e. new parks, roadway improvements, etc.). A requirement for additional community benefits imposed on by-right projects without an impact nexus and at the thresholds recommended is legally not defensible and problematic. However, development projects seeking to develop beyond what is permitted by right provide such an opportunity and is the focus of Action LU-1.2 Community Benefits. The action is being modified for added clarity.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
67	Suggested Action Change: Action LU-2.8: City-Owned Land - Coordinate future disposition of City-owned property and remnant parcels, consistent with the Surplus Land Act. 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.	N/A	Creating additional home ownership opportunities can be furthered through the creation of community land trust (CLT). However, utilizing City owned parcels of land might prove challenging due to many having restrictions based on funds used at the time of purchase. The draft Housing Element Update includes an action to identify funding and to partner with community based organizations to support the creation of a CLT program, which was crafted in partnership with community groups. Having CLT related actions in the Housing Element is germane and appropriate.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
68	Include language in support of mobile home residents throughout Elements in the General Plan	N/A	The draft Housing Element Update includes actions specifically related to supporting mobile home residents, such as action HE-2 which will provide grants of up to \$25,000 for the repair and rehabilitation of mobile homes, prioritizing applicants in R/ECAP and TCAC census tracts, low-income households, and seniors. Additionally, the action will seek to augment funding and program reach by tracking and applying for grants as opportunities arise. No additional action related to the broader draft General Plan Update is necessary.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
69	The following city-owned parcels should be designated open space, per City Council direction on 8/17/2021: 915, 921 N Flower St, and 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.	N/A	The parcels identified along Flower Street and Garnsey Street are not all City owned properties, and therefore the General Plan land use designation cannot be changed at this time. However, City staff is in the process of acquiring the three privately owned parcels to consolidate with City owned parcels and develop the site as a park in the future. The parcel at 810 North English Street is a recently acquired site. Staff is including the parcel for future evaluation in the Parks Master Plan to be developed as a potential park in the future.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
70	Remove ONE BROADWAY PLAZA DISTRICT CENTER (OBPCD) zoning designation	N/A	The One Broadway Plaza District Center is an existing land use designation and is not being proposed to change. The land use approved by voters in 2005.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
71	Recommend that an Environmental Justice Office is created and falls under the supervision of the Public Health Director and that a Environmental Justice Standing Committee be form.	Recommended New Action: <u>CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input. Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022
72	Suggested Language: Modify the Open Space Element to define "parks" and "parkland" with reference to the Municipal Cod'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).	Recommended Definition Added to GP Glossary: <u>Park and Parkland. Publicly accessible sites and green space that are owned and/or managed by the City of Santa Ana to support recreation and social gathering.</u>	Park and Parkland definition recommended to be included in the General Plan Introduction, Glossary section.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
73	Suggested Language: Modify 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."	Recommended Definition Added to GP Glossary: <u>Open Space. Recreational and green spaces, including parks, commercial open space, manicured landscaped areas, and public facilities such as trail corridors, water channels and rail infrastructure.</u>	Open Space definition recommended to be included in the General Plan Introduction, Glossary section.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
74	Amend the Municipal Code to include this definition of "open space," which is not currently defined in the code.	Recommended Definition Added to GP Glossary: <u>Open Space. Recreational and green spaces, including parks, commercial open space, manicured landscaped areas, and public facilities such as trail corridors, water channels and rail infrastructure.</u>	The definitions used in the Municipal Code will be amended for consistency after the General Plan Update, Parks Master Plan, and Residential Fee analyses are completed.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
75	Suggested Language: Modify 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."	Recommended Definition Added to GP Glossary: <u>Park Deficient Area. Areas of the community that are outside the standard public parkland service radius such as 1/2 mile for Community Parks and ¼ mile for Neighborhood Parks, respectively.</u>	Park Deficient Area definition recommended to be included in the General Plan Introduction, Glossary section.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
76	Suggested Language: Modify 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."	Recommended Definition Change: Environmental Justice Community. <u>A disadvantage community as defined by Government Code Section 65302(h)(4)(A), which is an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code or 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.</u> The City uses a mapping tool from CalEPA called CalEnviroScreen (CES) to identify the most vulnerable and disadvantaged areas in Santa Ana (in the context of SB 1000). The CES tool measures indicators for every census tract in California related to people’s exposure to pollution and quality of life. The results for each census tract are combined and measured against every other census tract, producing a composite score that ranks census tracts from the least impacted to the most impacted. Those ranked in the top 25 percent—shown with values between 75 and 100 percent—are considered disadvantaged or environmental justice communities.	Definition needs to be consistent with Public Resources Code.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
77	Suggested New Policy: 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.	N/A	Action OS-1.4 already addresses this and no additional policy is recommended.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021

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78	Suggested Action Change: 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.	Recommended Action Change: OS-1.4: No Net Loss of <u>Public</u> Parkland. Establish land use provisions in the Municipal Code that prevent a no net loss in the City of <u>Santa Ana</u> . Require at least a 1: 1 replacement if there is any loss of public parkland <u>or City owned open space</u> due to public or private development.	Action has been modified to address community comment and maintain the focus on public park land that is used to calculate the City's level of service level for park services. For reference, the recommended definition for "Park and Parkland" is as follows: Publicly accessible sites and green space that are owned and/or managed by the City of Santa Ana to support recreation and social gathering.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021 & City Council
79	Suggested Policy Change: 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 parkland 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.	1) Recommended Action Change: OS-1.1: Park Needs Assessment and Master Plan. Create, adopt, and implement a park needs assessment and master plan, <u>based on community input</u> , defining park service areas according to best practices, establishing a service area for each park facility, creating a tool to evaluate needs and prioritize improvements by quadrant or appropriate geographic subarea, and maintaining a list of priorities for the expansion and improvement of open space and recreational facilities in each quadrant or geographic subarea to attain a park land standard of <u>3</u> acres per 1,000 residents. 2) Recommended Policy Change: Policy OS-1.3: Park Standard - Establish and maintain public parks, open space, and recreation requirements for new residential and nonresidential development to provide sufficient opportunities for Santa Ana residents and visitors. Attain a minimum of <u>3</u> acres of land per 1,000 persons residing in the City of Santa Ana.	The community comment to increase the ratio in acres per 1,000 residents is in alignment with comments provided by members of the City Council. The ratio has been revised to three (3) acres per 1,000 residents. In addition, prioritizing the creation of new parkland over impact fees is addressed in Policy OS-1.9.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
80	Suggested New Action: 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.	Recommended Action Change: OS-1.6. Development Fees. Update the City's <u>Acquisition and Development Ordinance to increase the parkland dedication requirements to meet 3 acres of parkland per 1,000 residents. Require that fees collected in place of parkland dedication to be utilized to acquire or expand facilities within geographic proximity to new development or in parkland deficient areas.</u>	Action has been modified to include updating the Acquisition and Development Ordinance found in Chapter 35 of the Municipal code to be consistent with proposed park ratio of the 3 acres per 1,000 residents.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
81	Suggested Policy Change: 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- <u>their homes</u> . Prioritize park provision, programs, and partnerships in park deficient and environmental justice areas.	Recommended Policy Change: OS-1.4: Park Distribution. Ensure <u>that all</u> City residents have access to public parks, recreation facilities, or trails within a 10 minute walking and biking distance of <u>their homes</u> . Prioritize park provision, programs, and partnerships in park deficient and environmental justice areas.	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
82	Suggested Policy Change: Policy OS-1.8. Land Acquisition and Equitable Distribution. Explore options for the acquisition of <u>Acquire</u> available lands for parks, open space, greenways and trail corridors, with priority given to sites that are within park deficient or <u>and</u> environmental justice areas.	Recommended Policy Change: OS-1.8: Land Acquisition and Equitable Distribution. <u>Acquire</u> available lands for parks, open space, greenways and trail corridors, with priority given to sites that are within park deficient or <u>and</u> environmental justice areas.	The comment is noted and is recommended to be included in its entirety.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
83	Suggested Policy Change: 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 . <u>Prioritize public parks and recreational facilities in park-deficient areas</u> . 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.	Recommended Policy Change: 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 . 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.	Policy has been revised to address community comments.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
84	Suggested Action Change: Action OS-1.10: New parkland. <u>Create new public parkland in park- deficient areas via purchase or land dedication</u> . In addition, Coordinate with property owners to explore options to provide public access and programming <u>on privately-owned open space</u> 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 <u>public</u> use of land-such open space for recreational opportunities .	Recommended Action Change: OS-1.10: New parkland <u>collaborative</u> . Coordinate with property owners to provide public access and programming <u>on privately-owned open space</u> in park deficient areas, including options to acquire land through purchase, land dedication, and obtain easements, <u>and</u> land leases that would allow for permanent or temporary <u>public</u> use of land for <u>open space and</u> recreational opportunities.	Action has been modified to address community comments and clarify action's focus on collaboration with private property owners to identify new public parkland and open space opportunities.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
85	Suggested Policy Cange: 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 . <u>Ensure that new development includes</u> 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.	Recommended Policy Change: OS-1.9: New Development. <u>Require</u> all new development <u>to provide adequate parks and open space, including via parkland dedication or development fees, in order to meet the City's park standard</u> . <u>Ensure that new development includes</u> 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.	Policy has been revised to address community comments and to strengthen language and be less ambiguous.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021
86	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 . <u>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</u> . 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.	Recommended Action Change: OS-1.6: Development Fees. <u>Update the City's Acquisition and Development Ordinance to increase the parkland dedication requirements to meet 3 acres of parkland per 1,000 residents</u> . <u>Require that fees collected in place of parkland dedication to be utilized to acquire or expand facilities within geographic proximity to new development or parkland deficient areas</u> .	Action has been revised to be consistent with new recommended goal of three (3) acres of parkland per 1,000 residents.	Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021

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87	<p>Suggested Action Change: 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 parkland. 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.</p>	<p>Recommended Action Change: OS-1.7: Public Parklands Requirements for Larger Residential Projects. Update the Residential Development Fee Ordinance for large residential projects, <u>which include projects of 100 residential units or more</u>, to require public parkland within the City limits and a 10-minute walking distance of the new residential projects.</p>	<p>Action has been revised to state the size of projects that would qualify under this action, but does not recommend providing the details included in the community comment. Specificity, such as in the suggested language, is too specific to include in the General Plan and would be addressed where feasible through the development of the Parks Master Plan as subsequent revisions to the City's Acquisition and Development Ordinance.</p>	<p>Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021</p>
88	<p>Suggested Policy Change: 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.</p>	<p>Recommended Policy Change: 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, <u>to increase park investment per resident and meet the City's Park Standard of 3 acres per 1,000 residents.</u> Set aside park funding to have monies on hand to acquire and develop parkland when opportunities arise and to leverage grant options.</p>	<p>Action has been modified to address community comment and new recommended goal of three (3) acres per 1,000 residents.</p>	<p>Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021</p>
89	<p>Suggested New Policy: Policy OS-1.14: 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).</p>		<p>Funding and allocation priorities are determined by the City through the budget process.</p>	<p>Collaborative Letter (MPNA, OCEJ, THRIVE, & Rise Up Willowick) received 3.14.2022 / Rise Up Willowick letter dated 9.15.2021</p>

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90	Suggested Language: Rise Up Willowick recommends a strong commitment to the reuse of Willowick Golf Course for the purpose that this community has consistently wanted: parkland and affordable housing. The General Plan should advance this commitment by creating a separate designation for Willowick in Figure LU-4 and Table LU-3, "Open Space/Affordable Housing (OS-AH)." The OS-AH designation would allow open space and park uses, along with a limited amount of housing deed-restricted to be offered at cost below market rates. It would allow a density of 30 dwelling units/acre, and allow housing and ancillary improvements to occupy up to 12 acres of the Willowick site. It would have a typical maximum height of four stories. The General Plan description of the designation would read as follows: The Open Space-Affordable Housing designation ensures that the Willowick Golf Course site is developed to help meet Santa Ana's needs for parkland and affordable housing. As of the adoption of this General Plan Update, the City of Garden Grove owns Willowick, but intends to close the golf course and redevelop the site. This offers Santa Ana a rare opportunity to guide the development of a large tract in the West Santa Ana Boulevard Focus Area, very close to Cesar Chavez Campesino Park and single-family home neighborhoods (designated LR-7 and LMR-11) to the north and northwest. Open Space-Affordable Housing allows for the entire site to be kept in open space, with a wide variety of public uses available, including passive parkland, playgrounds, ballfields, and park-related structures. It also allows, but does not require, development of a portion of the site with relatively dense housing, which must be restricted to units provided at rates affordable to lower income households pursuant to Health and Safety Code Section 50079.5. Such housing may occupy no more than 12 acres and must be in a contiguous area (not scattered among parkland). The height and density limits ensure that any housing will be constructed at a scale to provide a transition from the adjacent single-family-home neighborhoods to the new parkland, while maintaining the open space character of the majority of the acreage.	N/A	The General Plan update land use designation of Willowick Golf Course is Open Space and is not proposing any changes to this designation. This land is not owned by the City. Should the City Council desire to make changes to its designation, it should be addressed as a separate General Plan Amendment.	Rise Up Willowick letter dated 3.18.2022
91	Suggested New Policy: Policy LU-XX: Support, with City funds as necessary and prudent, and encourage development on the Willowick Golf Course site consistent with the OS-AH designation, which would bring substantial public benefit. Change the land's designation or allowed uses with caution and only upon a finding, supported by strong evidence, that the proposed new use will provide equal or greater benefits to the city and people of Santa Ana.	N/A	The General Plan update land use designation of Willowick Golf Course is Open Space and is not proposing any changes to this designation. This land is not owned by the City. Should the City Council desire to make changes to its designation, it should be addressed as a separate General Plan Amendment.	Rise Up Willowick letter dated 3.18.2023
92	Suggested Action Change: Action S-2.4: Lead contamination - Work with local and regional partners, such as Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with such local and regional partners and environmental justice stakeholders in proposing, selecting, and implementing solutions to mitigate (i.e., remove, cover, and remediate) hazardous lead-contaminated soils in the city in a manner that includes benchmarks (including but not limited to time benchmarks) and routine monitoring of soil lead levels to measure and track effectiveness of selected programs.	Recommended Action Change: S-2.4: Lead Contamination. Work with <u>state</u> , local and regional partners, such as <u>the Department of Toxic Substances Control, South Coast Air Quality District,</u> Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with <u>such state agencies, local and regional partners and</u> environmental justice stakeholders in proposing, <u>selecting, and implementing measures to mitigate (i.e., remove, cover, and remediate)</u> hazardous lead-contaminated soils in the city <u>in a manner that includes key benchmarks and routine monitoring of soil lead levels</u> to measure and track effectiveness of <u>selected approach</u> .	Action has been modified to address community comment.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
93	Suggested Agency/Time Frame Change: Action S-2.4: PBA & CDA / Target Year: 2022 Ongoing	Recommended Agency/Time Frame Change: PBA/CDA / <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
94	Suggested Action Change: Action CM-3.8: Environmental soil and human health screening measures - Collaborate with Orange County Health Care Agency and local stakeholders, such as Orange County Environmental Justice and UC Irvine Public Health, in efforts to provide increased healthcare services (i.e., blood lead testing, treatment) for residents of environmental justice communities, including undocumented, uninsured, and under-insured residents living in neighborhoods impacted by soil lead contamination and to agree upon locally acceptable and enforceable safety thresholds for lead exposure and contamination; collaborate to advocate for adjustment of the County and State policies for health and environmental screening levels to promote healthy outcomes related to lead contamination as recommended by health experts.	Recommended Action Change: CM-3.8: Environmental Soil <u>and Human Health Screening</u> . Collaborate with Orange County Health Care Agency and local stakeholders, such as Orange County Environmental Justice and UC Irvine Public Health, in efforts <u>to provide increased healthcare services (i.e., blood lead testing, treatment) for residents, especially those that reside in environmental justice communities. Additionally, collaborate to advocate for adjustment of the</u> County and State policies for health and environmental screening levels to promote healthy outcomes related to lead contamination as recommended by health experts.	Action has been modified to reflect the spirit of the comment and to be inclusive of all persons residing in Santa Ana regardless of group affiliation, legal status, or insurance type or lack there of. Additionally, Orange County Health Care Agency (OCHCA) programs do not make a distinction of anyone's legal or insurance status when providing services related to lead.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
95	Suggested New Action: Action CN-XX: Lead contamination - Work with local and regional partners, such as Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with such local and regional partners and environmental justice stakeholders in proposing, selecting, and implementing solutions to mitigate (i.e., remove, cover, and remediate) hazardous lead-contaminated soils in the city in a manner that includes benchmarks (including but not limited to time benchmarks) and routine monitoring of soil lead levels to measure and track effectiveness of selected programs.	Recommended Action Change: S-2.4: Lead Contamination. Work with <u>state, local and regional partners, such as the Department of Toxic Substances Control, South Coast Air Quality District,</u> Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with <u>such state agencies, local and regional partners and environmental justice stakeholders in proposing, selecting, and implementing measures to mitigate (i.e., remove, cover, and remediate)</u> hazardous lead-contaminated soils in the city <u>in a manner that includes key benchmarks and routine monitoring of soil lead levels to</u> measure and track effectiveness of <u>selected approach</u> .	Action addressing lead contamination already exists in the Safety Element (S-2.4) and need not be duplicate in different.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
96	Suggested Action Change: Action LU-3.6: Lead paint abatement - Coordinate with County of Orange Health Care Agency and community organizations to strengthen local programs and initiatives to eliminate lead-based paint hazards, with priority given to residential buildings located within environmental justice area boundaries. When conducting lead paint abatement, ensure that workers have proper physical protections; safeguard other areas of the abated building or residence from lead or other toxins that may be re-suspended in the air, soil, and dust; provide support for temporary relocation of residents during abatement process; and monitor lead levels for workers, residents, and the indoor and outdoor environment of the residence that was abated.	N/A	Workplace safety is already regulated by Cal/OSHA and is outside of the City's regulatory authority.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
97	Suggested New Action: Action LU-XX: Protect workers' health during lead paint abatement - Provide appropriate knowledge and protective gear and equipment for workers certified as lead renovators when conducting renovation activities. Ensure that trained workers have reasonable workloads and time frames for completion of renovation activities.	N/A	Workplace safety is already regulated by Cal/OSHA and is outside of the City's regulatory authority.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
98	Suggested Action Change: Action LU-3.18: Renovations and lead prevention - Require contractor training and/or certification for safe work practices to conduct residential renovations for pre-1978 structures that may contain existing lead paint.	Existing Action: LU-3.18: Renovations and Lead Prevention. Evaluate the feasibility of requiring contractor training and/or certification for safe work practices to conduct residential renovations for pre-1978 structures that may contain existing lead paint.	Training for contractors should only be implemented once full analysis of costs and benefits to the community have been thoroughly analyzed and already a part of the draft action.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022

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99	Suggested Action Change: Action LU-3.19: Promote health - Partner with local organizations (e.g., OC Health Care Agency, Latino Health Access, Santa Ana Unified School District, and the Coalition of Community Health Centers, Orange County Environmental Justice, and other environmental justice organizations) to increase blood lead testing, outreach, education, and referral services through a ‘promotora’ or community peer outreach model that addresses the root causes of elevated blood lead levels impacting Santa Ana residents, with special focus in environmental justice communities and for children living in pre-1978 housing. Follow-up with households regarding the results of blood lead tests, discuss the meaning of the tests results, and share resources that individuals and households can leverage to address and prevent lead exposures.	Recommended Action Change: LU-3.19: Promote Health. Partner with local organizations (e.g., OC Health Care Agency, Latino Health Access, Santa Ana Unified School District, <u>Garden Grove Unified School District, Orange County Environmental Justice</u> , and the Coalition of Community Health Centers) to increase blood lead testing, outreach, education, and referral services through a ‘promotora’ or community peer outreach model that addresses the root causes of elevated blood lead levels impacting Santa Ana residents, with special focus in environmental justice communities and for children living in pre-1978 housing.	Action has been revised to include the Garden Grove Unified School District and Orange County Environmental Justice, but does not recommend detailing the types of services provided in the community comment, nor does it believe it is within the City's role to provide medical consultations and advice. Whatever service the City will be providing, should be left to be explored and agreed upon through the partnership with the listed agencies and groups through implementation of this draft action.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
100	Suggested Action Change: Action LU-3.20: Safe housing - Require all residential rehabilitation projects that use local, or HUD federal funds to comply with the Lead Safe Housing Rule, to remove lead paint hazards, depending on the nature of work and the dollar amount of federal investment in the property. Ensure that low-income residents and renters are able to participate in remediation and abatement programs. Provide protection from retaliation by landlords for renters seeking lead assessments and/or remediation. Remove lead-soldered joints when replacing older joints.	N/A	Tenant protections are addressed by state law. The City of Santa Ana has taken additional steps to ensure tenants are protected through its Just Cause Eviction and Rent Stabilization ordinances. Additionally, Action HE-52 in the proposed Housing Element Update includes holding annual small apartment managers’ workshop to train and educate property owners, HOAs, property managers, and tenants of best practices in property management, neighborhood safety, and landlord/tenant responsibilities; and partnering with legal assistance organizations to provide legal clinics for tenants on tenants’ rights and recourse for intimidation and unjust evictions. Additionally, Action LU-3.28: Tenant Protections will provide information to residential tenants regarding Landlord Tenant Laws in the State, such as AB 1481, and Santa Ana's Just Cause For Tenant Eviction and Rent Stabilization ordinances that provide protections against evictions for those who seek action to improve substandard housing and hazardous conditions. Together, the proposed actions already in the drafts will provide the protections being suggested.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
101	Suggested Action Change: Action LU-3.21: Prevention education - Collaborate with local organizations such as Orange County Health Care Agency and State Environmental Protection Agency and community-based environmental justice organizations and identify funds to create a Santa Ana Prevent Lead Poisoning Education Program, with special focus on disadvantaged communities and pre-1978 housing stock. Implement mechanisms for local community-based environmental justice organizations to guide the Santa Ana Prevent Lead Poisoning Education Program and provide annual reports regarding fund activities and allocation of resources.	Recommended Action Change: LU-3.21: Prevention Education. Collaborate with local organizations such as Orange County Health Care Agency, State Environmental Protection Agency, <u>and community-based environmental justice organizations</u> to identify funds <u>and</u> create a Santa Ana Prevent Lead Poisoning Education Program, with special focus on disadvantaged communities and pre-1978 housing stock.	Action has been revised to include suggested edit, but does not include the specificity suggested by community comment for program. That level of program specificity will be addressed once the program is developed and funding for its implementation secured.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
102	Suggested Action Change: Action LU-3.22: Public health outcomes. Support the Orange County Health Care Agency in their role in investigating public complaints regarding lead hazards, through investigation of resident-identified concerns and enforcement of local housing and soil standards to assure healthy outcomes, including for individuals and households presenting with concerns about lead exposures and/or with confirmed blood lead levels of >3.5ug/dL, which the Centers for Disease Control and Prevention indicates as the threshold for follow-up and case management based on the latest recommendation on May 14, 2021.	Recommended Action Change: LU-3.22: Public Health Outcomes. Support the Orange County Health Care Agency in their role in investigating public complaints regarding <u>unsafe lead work practices and lead hazards wherein children are present</u> , through enforcement of local housing standards to assure healthy outcomes <u>including for individuals and households presenting with concerns about lead exposure and/or with confirmed lead levels of >3.5 ug/dL, which the Centers for Disease Control and Prevention indicates as the threshold for follow-up and case management in children.</u>	Action has been revised to include suggested language.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
103	Suggested Action Change: Action LU-3.26: Health conditions - Work with Orange County Health Care Agency and local stakeholders including Orange County Environmental Justice and UC Irvine Public Health to identify baseline conditions for lead contamination in Santa Ana, routinely monitor indicators of lead contamination, and measure positive outcomes. Collaborate with these organizations to secure grant funds for soil testing, remediation (i.e., bioremediation, covering, removing), and prevention activities for residential properties in proximity to sites identified with high soil lead levels, with a focus on Environmental Justice census tracts. Publicly report findings from regular monitoring of soil lead levels and remediation and prevention activities.	Recommended Action Change: LU-3.26: Health Conditions. Work with <u>state agencies including Department of Toxic Substances Control and South Coast Air Quality Management District</u> , Orange County Health Care Agency, and local stakeholders including Orange County Environmental Justice and UC Irvine Public Health to identify baseline conditions for lead <u>soil and air</u> contamination in Santa Ana, <u>routinely</u> monitor indicators of lead <u>such</u> contamination, and measure positive outcomes. Collaborate with these organizations to secure grant funds for soil <u>and air</u> testing, remediation (<u>e.g., bioremediation, covering, removing, air filtration</u>), and <u>prevention activities</u> for residential properties in proximity to sites identified with high soil <u>lead</u> levels <u>of soil pollution</u> (<u>including sites identified with soil lead levels of 80 ppm or higher</u>), and <u>air pollution</u> with a focus on <u>communities disproportionately affected by soil contamination.</u>	Action has been revised to include suggested language, but does not include addition of new sentence at the end of action. Action CN-1.10 already addresses community comments related to making any environmental hazard or site history information public through publishing such reports on the Environmental Quality webpage (webpage is proposed as part of Action CN-1.10). Per March 28, 2022 roundtable, new revisions related to soil and air included in response to MPNA comments to broaden collection of baseline conditions. Reference to 80 ppm added in response to OCEJ comments in context of pursuing grant funding.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
104	Suggested Action Change: Action LU-3.29: Development site history - Update the City’s Development Review application process to require developers to provide information regarding the prior use of the site and history of hazardous materials on the property, in order to identify potential for site contamination from hazardous materials or soil lead contamination to be remediated. Make development site history publicly accessible.	N/A	Making development project related documents is vital to maintaining a transparent development process. As such, and as already required by the City's Sunshine Ordinance, development projects are required to create project specific webpages where plans, reports, and renderings are published and available for public review. If the draft General Plan Update is approved and development site history reports are required, reports generated will be posted to the project webpage like the other documents. Suggested language is not needed as making such data publicly available is already required.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2022
105	Suggested Action Change: Action HP-1.5: Historic design standards - Update historic design standards for preserving historic setting and context, incorporating best practices related to landscape design, front yard fences, other property features, and remediation of lead-based paint and lead-contaminated soil.	N/A	Action HP-1.5 is strictly related to design. While lead contamination is an important issue facing Santa Ana communities, it is not germane to this actions and is already being addressed through other policies and actions such as action LU-3.6 Lead Paint Abatement and action S-2.4 Lead Contamination.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2023
106	Suggested Action Change: Action LU-4.3: Public improvements in activity nodes and focus areas - Create a public realm plan for each activity node and focus area to establish a unified vision for long-term improvements to streets, sidewalks, plazas, other public spaces, and placemaking elements. Identify soil contamination reduction opportunities and other public improvement priorities and pilot projects for each focus area. [Sic] Program priority improvements and pilot projects into the City's Capital Improvement Program. Suggested Language, LU-4, IA 4.7: Construction improvements. Identify best practices and communication tools to reduce soil contamination and monitor mitigation measures and oversight of private and public construction improvements to protect the soil , health and safety of workers , the community, and the soil , with focus on environmental justice areas.	Recommended Action Change: LU-4.3: Public Improvements in Activity Nodes and Focus Area. Create a public realm plan for each activity node and focus area to establish a unified vision for long-term improvements to streets, sidewalks, plazas, other public spaces, and placemaking elements. Identify public improvement priorities and pilot projects for each focus area <u>and include them in the City's Capital Improvement Program.</u> Program priority improvements and pilot projects into the City's Capital Improvement Program	Soil contamination reduction is an important issue facing Santa Ana communities. As such, there are numerous policies and actions specific to that issue. Augmenting soil contamination to this action, which is to formulate a vison and plan for public improvements at activity nodes, is not germane or necessary. Additional edits have been added to action for clarity.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2024

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
107	Suggested Action Change: Action CN-1.10: Environmental Justice Office Interagency Team - Establish an environmental justice office with at least one public health expert on staff to ensure capacity to play a leadership role in implementation of policy, implementation, and decisions involving environmental quality and environmental justice issues; to coordinate across agencies and engage residents to implement environmental justice aspects of the General Plan and quality interagency team to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas; publish results and information on the City's website through a dedicated Santa Ana Environmental Quality web page.	Recommended New Action: <u>CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input. Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2025
108	Suggested Action Change: Action LU-3.25: Engage EJ Communities - Work with community serving organizations, neighborhood leaders, and residents to form an Environmental Justice Office with at least one public health expert on staff to ensure capacity to play a leadership role in implementation of policy, implementation activities, and decisions involving environmental quality and environmental justice issues and to develop ongoing EJ Community Engagement programs for existing and new disadvantaged EJ communities, including multilingual communication protocols. Host biannual or quarterly Roundtable meetings with local stakeholders to guide and evaluate implementation of environmental justice policies.	Recommended New Action: <u>CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input. Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2026
109	Suggested Action Change: Action CN-1.1: Public Education - Augment existing outreach programs to improve public awareness of State, regional and local agencies' roles and resources to identify, monitor, and address air quality and other environmental hazards in the community; to provide regular reports to residents and environmental justice stakeholders that identify air quality and other environmental hazards as well as strategies for risk mitigation; and to allow space for community members to raise concerns about heretofore unidentified environmental health issues and environmental hazards in their neighborhoods.	Recommended Action Change: CN-1.13: Community Survey On Health Lifestyles. Plan for and conduct a community survey of residents <u>every two years</u> related to community health, <u>pollution</u> , parks, <u>community engagement</u> , and community services; with focused outreach for environment justice concerns and priority areas. <u>Report findings of survey through the various media platforms and utilize input to inform periodic evaluation and update of General Plan.</u>	The intent of the draft public education action is to improve public awareness of state, regional, and local agencies' roles and resources. Action CN-1.13 provides an opportunity for community members to raise community health, pollution concerns, parks, service needs in their neighborhood. The timeframe of the survey has been revised to every two years. Two years will provide the needed time to formulate surveys, provide sufficient time to respond, collect data, analyze data, report findings, and formulate actions to address feedback. Through proposed actions, such as CN-1.10, results of surveys, analysis, and outcomes will be publicly accessible through the Environmental Quality webpage.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2027
110	Suggested Action Change: Action CN-1.13: Community survey on healthy lifestyles - Plan for and conduct a community survey of residents related to community health, air quality, parks, and community services; with focused outreach for environment justice concerns and priority areas (tie into other City efforts like Strategic Plan, park and recreation planning, community benefits, etc.). Collaborate with environmental justice organizations to design and interpret community survey findings and ensure that residents have several options for how to complete the survey (e.g., online, in-person, phone). Make surveys and summaries of survey findings available in multiple languages.	Recommended Action Change: CM-1.2: Community Conservation. Plan for and conduct a community survey every <u>two years</u> related to community health, <u>pollution</u> concerns, parks, <u>community engagement</u> , and community service needs, with focused outreach to environmental justice priority areas <u>utilizing various platforms, such as social media and school events, to encourage substantial survey participation.</u>	The intent of the draft Action is to obtain continually receive feedback from the community and is recommending conducting a targeted EJ survey that focuses on community health, pollution concerns, parks, service needs and City community engagement best practices. The timeframe has been revised to every two years. Two years will provide the needed time to formulate surveys, provide sufficient time to respond, collect data, analyze data, report findings, and formulate actions to address feedback. As previously mentioned, the Environmental Quality webpage proposed by action CN-1.10 will be the home of such survey results and summaries.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2028

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
111	Suggested Action Change: Action CN-1.14: Expanded interactions - Conduct regular meetings organized by City staff and invite decision-makers in neighborhoods within environmental justice area boundaries. In these meetings residents, community organizations , and businesses should be given a platform to easily communicate their unique issues and needs, as well as their recommendations on how best to implement environmental health, and environmental justice policies. Include a language interpreter(s) at these meetings so that all residents can engage. Ensure that these meetings bring together residents and multiple community-based organizations whose work focuses on environmental justice.	Recommended Action Change: CN-1.14: Expanded Interactions. Identify opportunities to expand attendance and support neighborhood associations and community groups to hold <u>regular meetings with</u> City staff and decision-makers in neighborhoods within environmental justice communities, so that residents, <u>community organizations</u> , and businesses can communicate their unique issues and needs, <u>as well as their recommendations on how best to implement environmental quality</u> , environmental health, and environmental justice policies. Arrange for <u>language interpretation services as needed</u> at these meetings so that all residents can <u>participate</u> .	Action has been revised to address comment.	Alana M.W. LeBron, et.al., UCI letter dated March 11, 2029
112	Suggested Policy Change: Policy PS-2.7: Staffing Level - Maintain Increase staffing levels for sworn peace officers, fire fighters, emergency medical responders, code enforcement, and civilian support staff to provide quality services and maintain an optimal response time citywide, as resources become available.	Recommended Policy Change: PS-2.7: Staffing Level. <u>Increase</u> staffing levels for sworn peace officers, fire fighters, emergency medical responders, code enforcement, and civilian support staff to provide quality services and maintain an optimal response time citywide, <u>as resources become available</u> .	The comment is noted and is recommended to be included in its entirety.	City Council
113	Suggested Policy Change: Policy M-2.1: Interstate Freeways - Support Caltrans and OCTA efforts to modernize and improve freeways by improving safety, capacity, convenience of access, and operational efficiencies , while addressing impacts to neighborhoods.	Recommended Policy Change: M-2.1: Interstate Freeways. Support Caltrans and OCTA efforts to improve freeway safety, while addressing impacts to neighborhoods.	The comment is noted and is recommended to be included in its entirety.	City Council
114	Suggested Policy Change: Policy M-2.2: Transit Services - Support OCTA, Caltrans, and other Work with regional and local transportation providers to enhance existing transit services entities to provide residents, workers, and visitors with safe, affordable, accessible, convenient, reliable , and attractive transit services.	Recommended Policy Change: M-2.2: Transit Services. <u>Support OCTA, Caltrans, and other</u> regional and local <u>transportation providers to enhance existing transit services</u> to provide residents, workers, and visitors with safe, affordable, accessible, convenient, <u>reliable</u> , and attractive transit services.	The comment is noted and is recommended to be included in its entirety.	City Council
115	Suggested Policy Change: Policy M-4.5: Land Use Development Design - Ensure that building placement and design features create a desirable and active streetscape, by prioritizing pedestrian access directly from the street and placing parking lots to the rear of a development site.	Recommended Policy Change: M-4.5: Land Use Development Design. Ensure that building placement and design features create a desirable and active streetscape, <u>by prioritizing pedestrian access directly from the street and placing parking lots to the rear of a development site</u> .	The comment is noted and is recommended to be included in its entirety.	City Council
116	Suggested Action Change: Action M-1.2: MPAH - Coordinate with external agencies to ensure the OCTA Master Plan of Arterial Highways accommodates current and future demand for all users while prioritizing the safety of people utilizing non-automobile modes of transportation.	Recommended Action Change: M-1.2: MPAH. Coordinate with external agencies to ensure the OCTA Master Plan of Arterial Highways accommodates current and future demand for all users <u>while prioritizing the safety of people utilizing non-automobile modes of transportation</u> .	The comment is noted and is recommended to be included in its entirety.	City Council
117	Suggested Language: Change the first sentence of Page OS-1 to read as follows: The purpose of the Open Space Element is to identify, and preserve, and add open space areas that provide value to the community and enrich the quality of life.	Recommended Revision to Text: The purpose of the Open Space Element is to identify, preserve, <u>and add</u> open space areas that provide value to the community and enrich the quality of life.	The comment is noted and is recommended to be included in its entirety.	City Council
118	Suggested Policy Change: Policy OS-1.3: Park Standard - Establish and maintain public parks, open space, and recreation requirements for new residential and nonresidential development to provide sufficient opportunities for Santa Ana residents and visitors. Attain a minimum of two-three acres of land per 1,000 persons residing in the City of Santa Ana.	Recommended Policy Change: OS-1.3: Park Standard. Establish and maintain public parks, open space, and recreation requirements for new residential and nonresidential development to provide sufficient opportunities for Santa Ana residents and visitors. Attain a minimum of <u>3</u> acres of land per 1,000 persons residing in the City of Santa Ana.	The comment is noted and is recommended to be included in its entirety.	City Council
119	Suggested Action Change: Action OS-1.16: Acquisitions to meet park standard. Using the Park Master Plan as guidance, identify and acquire property within the City for park and open space use which will focus on bringing the park and recreation system to 2.3 acres of land per 1,000 residents with a plan to keep pace with future urban growth.	Recommended Action Change: OS-1.16: Acquisitions to Meet Park Standard. Using the Park Master Plan as guidance, identify and acquire property within the City for park and open space use which will focus on bringing the park and recreation system to <u>3</u> acres of land per 1,000 residents with a plan to keep pace with future urban growth.	The comment is noted and is recommended to be included in its entirety.	City Council

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
120	Suggested Agency/Time Frame Change: Action S-2.5: PBA & CDA / Target Year: 2022 Ongoing	Recommended Agency/Time Frame Change: Action S-2.5: PBA & CDA / Target Year: <u>Ongoing</u>	The comment is noted and is recommended to be included in its entirety.	City Council
121	Suggested New Action: Add an Implementation Action that establishes a permanent Environmental Justice staff person whose responsibilities are to make sure that the goals and implementation actions related to improving the environment for our communities are being implemented and followed through, such as following through on a truly collaborative process to identify solutions to address lead contaminated soil, and coordinating with State agencies, such as AQMD, DTSC, etc. to make sure that they are following through on complaints filed on offenders here in Santa Ana and that those agencies are not issuing an overconcentrated amount of pollution-producing permits.	Recommended New Action: <u>CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input.Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	City Council
122		Recommended Agency/Time Frame: <u>Action CM-3.9: CMO & PBA / Target Year: 2022.</u>		City Council
123	Suggested Action Change: Action LU-2.7: Fiscal Impact Model - Create Develop a project-level fiscal impact analysis model and that incorporates the appropriate mix of land uses to achieve fiscal sustainability, or at minimum, requirements that new development be fiscally neutral or beneficial to the City into the development process to make informed land use decisions.	Recommended Action Change: LU-2.7: Fiscal Impact Model. <u>Develop a fiscal impact analysis model that incorporates the appropriate mix of land uses to achieve fiscal sustainability, or at minimum, fiscal neutrality to make informed land use decisions. Require the completion of this analysis in mixed-use land use designations and in proposed conversion of commercial uses to residential or mixed-use projects.</u>	This is a Staff revision to clarify the intent of the fiscal impact mode and its applicability.	Staff
124	Suggested Action Change: Action LU-4.8: Mixed Use Lifestyles - Explore-establishing Establish and implement thresholds in the Zoning Code to identify require minimum percentage of commercial uses to be included in mixed use land use designations, as supported by economic and fiscal studies and in proposed conversion of commercial uses to residential or mixed use projects.	Recommended Action Change: LU-4.8: Mixed Use Lifestyles. <u>Establish and implement thresholds in the Zoning Code to require minimum percentage of commercial uses to be included in mixed-use land use designations and in proposed conversion of commercial uses to residential or mixed-use projects.</u>	Staff is proposing these changes to clarify the intent of this action and its applicability to certain projects.	Staff
125	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.	Recommended Action Change: S-2.4: Lead Contamination. <u>Work with state agencies including Department of Toxic Substances Control and South Coast Air Quality Management District, local and regional partners, such as Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with such state agencies, local and regional partners and environmental justice stakeholders in proposing, selecting, and implementing measures to mitigate (i.e., remove, cover, and remediate) hazardous lead-contaminated soils in the city in a manner that includes key benchmarks and routine monitoring of soil lead levels to measure and track effectiveness of selected approach.</u>	Action has been modified to address community comment.	Patricia Flores, OCEJ letter dated February 15, 2022

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126	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, on year is not enough time to effectively address the crisis.	Recommended Action Change: S-2.4: Lead Contamination. Work with <u>state agencies including Department of Toxic Substances Control and South Coast Air Quality Management District</u> , local and regional partners, such as Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with <u>such state agencies, local and regional partners and environmental justice stakeholders in proposing, selecting, and implementing measures to mitigate (i.e., remove, cover, and remediate) hazardous lead-contaminated soils in the city in a manner that includes key benchmarks and routine monitoring of soil lead levels to measure and track effectiveness of selected approach.</u>	Action has been modified to address community comment.	Patricia Flores, OCEJ letter dated February 15, 2022
127	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.	Recommended Action Change: CM-3.8 - Environmental Soil and Human Health Screening. Collaborate with Orange County Health Care Agency and local stakeholders, such as Orange County Environmental Justice and UC Irvine Public Health, in efforts <u>to provide increased healthcare services (i.e., blood lead testing, treatment) for residents, especially those that reside in environmental justice communities. Additionally, collaborate to advocate for adjustment of the County and State policies for health and environmental screening levels to promote healthy outcomes related to lead contamination as recommended by health experts.</u>	Action has been modified to reflect the spirit of the comment and to be inclusive of all persons residing in Santa Ana regardless of group affiliation, legal status, or insurance type or lack there of. Additionally, Orange County Health Care Agency (OCHCA) programs do not make a distinction of anyone's legal or insurance status when providing services related to lead.	Patricia Flores, OCEJ letter dated February 15, 2022
128	Accessibility of Public Comment: MPNA requests that residents be able to speak promptly and early on in City Council Meetings.	N/A	This comment/suggestion does not relate to the GP Update, rather, protocols for City Council meetings.	MPNA Attachment III, 2.18.22
129	Meaningful Consideration of Public Comment: MPNA requests that public comments be taken seriously by Council members. Ideally, the City partners with the community in decision-making, including the development of alternatives and identifying solutions.	N/A	This comment/suggestion does not relate to the GP Update, rather, to how City Council members communicate their decision making process in relation to public comments.	MPNA Attachment III, 2.18.22
130	Community Meetings MPNA requests that the City hold EJ Community Meetings twice each year. a) The EJ Community Meetings should focus on educating the community about environmental issues in their neighborhoods, engaging communities, and obtaining feedback for future and concurrent city planning goals.	Recommended Action Change: CN-1.14: Expanded Interactions. Identify opportunities to expand attendance <u>and support neighborhood associations and community groups to hold regular meetings with</u> City staff and decision-makers in neighborhoods within environmental justice <u>communities</u> , so that residents, <u>community organizations</u> , and businesses can communicate their unique issues and needs, <u>as well as their recommendations on how best to implement environmental quality, environmental health, and environmental justice policies.</u> Arrange for <u>language interpretation services as needed at</u> these meetings so that all residents can <u>participate</u> .	Action has been modified to reflect the spirit of the edits.	MPNA Attachment III, 2.18.22
131	Roundtable Meetings. MPNA requests that the City hold Roundtable Meetings with EJ community leaders, Government Agencies, and City Officials throughout the year. a) This will increase communication, accountability, and transparency between residents and government agencies. b) Agencies should include AQMD, DTSC, and OC Public Health. c) Experts from UC Irvine and representatives of SAUSD should be included. d) City officials must be present and should provide public health updates and compliance issues.	Existing Action: CN-1.10: Interagency Team. Establish an environmental quality interagency team to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas. Publish results and information on the City's website through a dedicated Santa Ana Environmental Quality webpage.	The Draft General Plan contains various policies and implementation actions related to increasing community engagement and participation regarding environmental justice issues. Existing Action CN-1.10 will establish an interagency team to evaluate, monitor, and make recommendations to address EJ related issues. Through the formulation of this team and the environmental justice staff person proposed under new action CM-3.9, details such as frequency of meetings, workshops, outreach, and participants will be analyzed and developed.	MPNA Attachment III, 2.18.22
132	Progress Reports. City officials and attending agencies should provide progress reports with specific metrics for how pollution and contamination is being addressed and resolved in EJ communities during EJ Community Meetings and Roundtable Meetings.	Existing Action: CM-3.3: Health Metrics. Engage with the Orange County Health Care Agency and other stakeholders to monitor key health indicators to measure the success of the outcome of General Plan policies and the implementation plan, including reduction in incidence in asthma and low birth weight of infants.	Action CM-3.3 Health Metrics provides a mechanism by which city staff will engage with Orange County Health Care Agency to monitor health indicators to track the progress and effectiveness of related actions. Further, implementation of Action CN-1.10 Interagency Team will create evaluation and monitoring team and webpage to publicize data related to health metrics and other environmental health related data.	MPNA Attachment III, 2.18.22

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	ENVIRONMENTAL RISK & REMEDIATION			
133	Clearer data visualizations for EJ impacts: MPNA requests a better understanding of the cumulative and overlapping environmental impacts on EJ communities at risk of pollution exposure. a) Understandable visuals help communicate the gravity of EJ issues in each community to residents. b) Residents should know the City understands the extent of the pollution problem, and is addressing the EJ issues residents face. c) A clear understanding between residents and City officials provides a baseline for measuring progress on remediation goals.	Recommended Action Change: CN-1.14: Expanded Interactions. Identify opportunities to expand attendance and support neighborhood associations and community groups to hold regular meetings with City staff and decision-makers in neighborhoods within environmental justice communities, so that residents, community organizations, and businesses can communicate their unique issues and needs, as well as their recommendations on how best to implement environmental quality, environmental health, and environmental justice policies. Arrange for language interpretation services as needed at these meetings so that all residents can participate.	Through the collaboration of local and regional stakeholders, community groups and the City (proposed Action CN-1.10 Interagency Team) and increased participation in community meetings, additional mapping tools to assist with communication, visualization, and outreach will be developed in accordance with community needs. The City will continue to monitor data and revise visualizations to be user-friendly and accessible. In addition, links to the California Office of Environmental Health Hazard Assessment (OEHHA) website and map viewer which identifies EJ tracts and provides map layers based on indicators utilized in determining EJ scores are published in the Environmental Quality webpage to assist residents in locating the information.	MPNA Attachment II, 2.18.22
134	Cumulative Impact Analyses: MPNA requests that the City incorporate into the General Plan Update maps and other visualizations depicting the overlap of water, soil, and air pollution and hazardous and toxic waste sites in Santa Ana. a) Existing maps from CalEnviroScreen (CES) in the EJ Background Appendix of the DPEIR show the Madison Park Neighborhood faces pollution exposure from air quality, toxic cleanup sites, groundwater threats, hazardous waste, and lead. b) The City should include details (zoomed-in versions) of these maps for every EJ Community in Santa Ana. c) These maps should be periodically updated for EJ Community Meetings. d) These results should distinguish between existing emissions, ongoing emitters, and newly planned emission sites.	Existing Action: CN-1.10: Interagency Team. Establish an environmental quality interagency team to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas. Publish results and information on the City's website through a dedicated Santa Ana Environmental Quality webpage.	The designation of a census tract as an EJ area is the result of a cumulative analysis of all of the indicators that the CalEnviroScreen methodology uses. Additionally, as the numerous programs to address EJ are undertaken, tailored visualizations for topical area or geographic area will be provided as needed. Moreover, designation of census tracts as EJ and census tract scores will continue to change based on new data and updates to the CalEnviroScreen. As such, providing up to date maps with the latest data and designations on the City's Environmental Quality webpage is a more optimal solution to providing the community up to date information.	MPNA Attachment II, 2.18.22
135	Maps of Emitters: MPNA requests maps marking where the current permit-holders for emissions of any kind of pollution are located. Similarly, there should be separate map details for each EJ Community. a) Along with these maps, there should be explanations for how development will likely change the area over the next 25 years.	Existing Action: CN-1.10: Interagency Team. Establish an environmental quality interagency team to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas. Publish results and information on the City's website through a dedicated Santa Ana Environmental Quality webpage.	The California Department of Toxic Substances provides an interactive map viewer where members of the public can view location of permit holders, contaminated sites, and status of permits, with the option of only viewing permits in EJ tracts. https://dtsc.ca.gov/ Through the creation of the Environmental Quality webpage, this resource and others like it will be published on the City's webpage for ease of access and awareness.	MPNA Attachment II, 2.18.22
	EMISSION STUDIES / PLANNED REMEDIATION IN EJ COMMUNITIES			
136	The Plan should aim to reduce and eliminate existing emissions / toxic sites, and limit or avoid new sources of emissions and toxics. The current plan fails by not fully addressing remediation goal	A number of policies and actions address this comment.	The Draft Plan includes a number of policies and actions that directly seek to reduce and/or eliminate heavy industrial uses near residences through development standards, incentives and amortization programs, creation of new land use designations that, if adopted, will no longer permit heavy industrial (Industrial Flex--South Main Street Focus Area and West Santa Ana Blvd.), and examining the feasibility of implementing new laws to prohibit heavy industry near homes. In addition, there are a number of actions that if adopted will lead to the City working more closely with air pollution regulating agencies to reduce pollution emissions. To see related actions see draft actions LU-3.2, LU-3.3, LU-3.4, LU-3.15, LU-3.23, LU-4.6, CN-1.1, CN-1.4, CN-1.5, CN-1.6, CN-1.7,CN-1.9, CN-1.12, CN-1.17, S-2.1, S-2.2, M-5.8, and draft policies m-1.7, CN-1.1, CN-1.3, CN1.15, CN-1.16, CN-1.18, OS-2.5, LU-3.12, and LU-4.3.	MPNA Attachment II, 2.18.22

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137	Lead Action Plan. MPNA requests that the City create an aggressive action plan to address the soil-lead contamination in Santa Ana EJ Communities that is backed with clear, enforceable measures. a) While the City plans to address some aspects of lead-based paint contamination, it has neglected historical emissions of leaded gasoline. 2. Mitigation Measures. MPNA requests that the City analyze and provide mitigation measures for the increased soil-contamination that can occur from the demolition or removal of existing buildings that contain lead-based paint.	A number of policies and actions address this comment.	The Draft Plan includes numerous actions aimed at addressing lead based contamination in the community, which were developed in partnership with community stakeholders. Lead contamination from non stationary sources like automobiles is a statewide problem and especially acute in urban environments where vehicle traffic is heaviest. The plan includes actions to help identify the exact cause of the pollution and to then seek funds to assist with remediation. The plan also includes actions to provide education related to renovations and construction on buildings that may have lead based products to reduce risk of lead poisoning. Actions addressing lead contamination include S-2.4, LU-3.6, LU-3.17, LU-3.18, LU-3.19, LU-3.20, LU-3.21, LU-3.22, LU-3.24, LU-3.26, and LU-3.29.	MPNA Attachment II, 2.18.22
138	Mitigation Measures. MPNA requests that the City analyze and provide mitigation measures for the increased soil-contamination that can occur from the demolition or removal of existing buildings that contain lead-based paint.	Recommended Action Change: LU-3.26: Health Conditions. Work with <u>state agencies including Department of Toxic Substances Control and South Coast Air Quality Management District, Orange County Health Care Agency and local stakeholders including Orange County Environmental Justice and UC Irvine Public Health to identify baseline conditions for lead soil and air contamination in Santa Ana, routinely monitor indicators of lead such contamination, and measure positive outcomes. Collaborate with these organizations to secure grant funds for soil and air testing, remediation (e.g., bioremediation, covering, removing, air filtration), and prevention activities for residential properties in proximity to sites identified with high soil-lead levels of soil pollution (including sites identified with soil lead levels of 80 ppm or higher), and air pollution, with a focus on communities disproportionately affected by soil contamination.</u>	Action has been modified to address frequency of soil monitoring, examples of remediation and emphasis on communities disproportionately affected by soil contamination. Per March 28, 2022 roundtable, new revisions related to soil and air included in response to MPNA comments to broaden collection of baseline conditions. Reference to 80 ppm added in response to OCEJ comments in context of pursuing grant funding.	MPNA Attachment II, 2.18.22
139	Baseline Pollution studies and Progress Reports. MPNA requests that the City publish data establishing a clear baseline of pollution that exists today that affects communities, specifically EJ communities. 3 a) The data should be published yearly to track the effectiveness and weaknesses of the GPU and should be presented at EJ Community Meetings.	Existing Action: CN-3.3: Health Metrics. Engage with the Orange County Health Care Agency and other stakeholders to monitor key health indicators to measure the success of the outcome of General Plan policies and the implementation plan, including reduction in incidence in asthma and low birth weight of infants.	Once established through proposed Action CN-1.10, an interagency team focused on EJ issues can evaluate all existing studies, monitoring and reporting systems conducted by established hazardous material regulating agencies relevant to Santa Ana, and publish through proposed Environmental Quality webpage and start to evaluate health indicators to track effectiveness.	MPNA Attachment II, 2.18.22
140	1,000 Feet Minimum Buffer-Zones. MPNA requests that the City commit to creating buffer zones of at least 1,000 feet between industrial uses and sensitive receptors. a) Currently POLICY LU-3.11 states “Promote landscaping and other buffers to separate existing sensitive uses from rail lines, heavy industrial facilities, and other emissions sources. As feasible, apply more substantial buffers within environmental justice area boundaries.” However, the policy has no detailed, enforceable language. b) The GPU should explicitly require this 1,000 feet minimum buffer-zone.	Existing Action: LU-3.2: Design Guidelines and Standards. Update the zoning code's development and operational standards for industrial zones to address incompatibility with adjacent uses, including minimum distance requirements to buffer heavy industrial uses from sensitive receptors. Conduct a study to evaluate and establish appropriate minimum distances and landscape buffers between polluting industrial uses from sensitive receptors such as residences, schools, day care, and public facilities.	Further analysis is required to determine what the appropriate buffer should be. If adopted, Action LU-3.2 will establish a process by which to study relevant data and best practices, to arrive at an appropriate distance, not simply choosing an arbitrary distance.	MPNA Attachment II, 2.18.22
141	Air Quality Enforceability. MPNA requests that the City incorporate language into the GPU that: a) Prioritizes EJ Communities b) Commits to initiate/implement its actions c) Defines when these actions would be triggered d) Commits to address incompatible land uses with EJ Communities.	Existing Action: LU-3.3: Healthy Lifestyles. Collaborate with residents and industry stakeholders to create a program to incentivize and amortize the removal of existing heavy industrial uses adjacent to sensitive uses.	There are 75 actions directly addressing EJ issues in the Draft Plan. The action/program table states what the City is committing to and when the action/program is expected to be completed. The Draft Plan also commits to establishing a buffer between heavy industrial uses and residences, and exploring incentives/amortization program to reduce conflicts between the two uses.	MPNA Attachment II, 2.18.22
142	The City must ensure the implementation of the GPU reduces and eliminates air emissions in EJ Communities. a) These problems are described in more detail in “Attachment A – MPNA Comments on the GPU” from our letter submitted as public comment titled “Comments on the City of Santa Ana’s General Plan Update” from October 29, 2020.	A number of policies and actions address this comment.	As depicted in the CalEnviroScreen tool, air pollution is not contained within city borders, rather, is shaped by regional forces as well as topographical variations. As such, there are regional and state agencies tasked with tackling air pollution. There are numerous policies and actions in the Draft Plan to ensure Santa Ana is doing its part locally and regionally to reduce air pollution. To see related actions see draft actions LU-3.2, LU-3.3, LU-3.4, LU-3.15, LU-3.23, LU-4.6, CN-1.1, CN-1.4, CN-1.5, CN-1.6, CN-1.7,CN-1.9, CN-1.12, CN-1.17, S-2.1, S-2.2, M-5.8, and draft policies m-1.7, CN-1.1, CN-1.3, CN1.15, CN-1.16, CN-1.18, OS-2.5, LU-3.12, and LU-4.3.	MPNA Attachment II, 2.18.22

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	TRANSPARENCY AND ACCOUNTABILITY			
143	EJ Progress Reports: The City should stay up to date on recommendations of the California DOJ Bureau of Environmental Justice with regard to Environmental Justice Goals and Implementation strategies, then update the community with new information. a) At EJ Community Meetings, the City should explain how it plans to implement its recommendations as part of the requested progress reports.	Existing Action: LU-3.25: Engage EJ Communities. Work with community serving organizations, neighborhood leaders, and residents to form an <u>Environmental Justice Action Committee</u> Ad Hoc Committee to develop ongoing EJ Community Engagement programs for existing and new disadvantaged EJ communities, including multilingual communication protocols. Host biannual or quarterly Roundtable meetings with local stakeholders to guide and evaluate implementation of environmental justice policies.	The City has received communication from DOJ stating that the Draft Plan complies with SB 1000 requirements. As indicated in action CN-1.10, an interagency team will be formed to work with stakeholders to address EJ issues and determine most effective ways to communicate with community members. Additionally, action LU-3.25 will build on the robust engagement strategy implemented during the General Plan Update to continue engaging EJ communities after the plan is adopted. Biannual removed in response to OCEJ comment during March 28, 2022 roundtable.	MPNA Attachment II, 2.18.22
144	Identify pollution violations. MPNA requests a complete list of companies that require special permits related to pollution and their history of violations between 2011-2021	N/A	This is not a policy/program recommendation for the General Plan Update. Information related to permits and violations can be requested through pertinent regulating regional, state, or federal agencies.	MPNA Attachment II, 2.18.22
145	Collaborate on community information requests. MPNA requests the City be forthcoming on new permits and approvals for industrial activity by facilitating information and data requests pertaining to industrial land use	N/A	This is not a policy/program recommendation for the General Plan Update. The City maintains a transparent development review process, maintaining websites for development projects, a master development list online, requires all developers comply with noticing and meeting requirements in the Sunshine Ordinance, and responds to public records request in a timely manner.	MPNA Attachment II, 2.18.22
	GREENSPACE / LAND PRESERVATION			
146	MPNA requests that the City incorporate provisions using permits to incentivize developers to create or preserve greenspace.	Recommended Policy Change: OS-1.9: New Development. <u>Require all new development to 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</u> 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.	Policy has been modified to address community comments and to clarify and strengthen language.	MPNA Attachment II, 2.18.22
147	MPNA requests the ratio of parkland to resident be at least 4 acres per 1,000 residents, similar to neighboring communities. a) The GPU has a goal of only 2 acres of parkland per 1,000 residents. (1) Newport general plan: 5 acres per 1,000 residents (2) Irvine general plan: 5 acres per 1,000 residents (3) Fullerton general plan: 4 acres per 1,000 resident	Recommended Policy Change: OS-1.3: Park Standard. Establish and maintain public parks, open space, and recreation requirements for new residential and nonresidential development to provide sufficient opportunities for Santa Ana residents and visitors. Attain a minimum of <u>3</u> acres of land per 1,000 persons residing in the City of Santa Ana.	The community comment to increase the ratio in acres per 1,000 residents is in alignment with comments provided by members of City Council. This ratio has been increased to three (3) acres per 1,000 residents.	MPNA Attachment II, 2.18.22
148	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.	Recommended New Action: <u>CM-3.9: Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to guide the implementation of the environmental justice policies and actions including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City. Agency: CMO/PBA and Target Year: 2022.</u>	The community comment is in alignment with comments provided by members of the City Council. Staff has prepared a recommended action to identify funding and hire a full-time EJ staff person per Council's input. Action revised in response to OCEJ comment that implementation of EJ policies and actions should be a collaboration and guided by the community.	MPNA, Leonel Flores, February 10, 2022 letter

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149	<p>Santa Ana Suggests: Policy CN-1.1 Regional Planning Efforts “Coordinate air quality planning efforts with local and regional agencies to meet State and Federal ambient air quality standards in order to protect all residents from the health effects of air pollution.” Santa Ana Is Missing: A policy to test, measure, record, maintain, and reduce air pollution emissions. Santa Ana Could Adopt: A policy more like that of the City of San Pablo’s Policy OSC-I-17 Prepare a Greenhouse Gas Emissions Reduction Plan to include a “baseline inventory of all known or reasonably discoverable sources of greenhouse gases (GHGs) that currently exist in the city and sources that existed in 1990... [a] projected inventory of the GHGs that can reasonably be expected to be emitted in the city in the year 2030 in accordance with discretionary land use decisions pursuant to this General Plan update and foreseeable communitywide and municipal operations... [a] target for the reduction of emissions...from those identified sources reasonably attributed to the City's discretionary land use decisions and municipal operations... [and a] list of feasible GHG reduction measures...whose purpose shall be to meet the established local reduction target, including energy conservation and "green building" requirements in municipal buildings and private development” <i>(text in red added by City staff for context)</i></p>	<p>A number of policies and actions address this comment.</p>	<p>The GHG reduction plan in San Pablo's General Plan draws on baseline and projected inventories from the State and regional air quality boards and agencies. Taking a similar approach, the Santa Ana GP Update actions seeks to collaborate with air pollution regulators to gather local data and create strategies to address emissions at the local level. See actions CN-1.1, CN-1.3, CN-1.6, CN-1.12, CN-1.19, and policies CN-1.3, S-1.2, CN-1.13, CN-1.15, and LU-4.5.</p>	<p>MPNA Attachment IV, 2.18.22</p>
150	<p>Santa Ana Suggests: Action OS-1.1 Park Needs Assessment and Master Plan “Create, adopt, and implement a park needs assessment and master plan defining park service areas according to best practices, establishing a service area for each park facility, creating a tool to evaluate needs and prioritize improvements by quadrant or appropriate geographic subarea, and maintaining a list of priorities for the expansion and improvement of open space and recreational facilities in each quadrant or geographic subarea to attain a park land standard of 2 acres per 1,000 residents.” Santa Ana Is Missing: A policy that identifies more specific implementation plans Santa Ana Could Adopt: A policy more like that of the City of San Pablo’s Policy HEA-I-5 “Link park facility improvement priorities to a ranking system keyed to public health and recreational goals... a performance-based priority system establishes a ranking scale that measures each component (e.g. pool, court, bench, or trail) of its system against the scale related to public health. For example, it might be a one-to-three scale in which one is below expectations, two indicates that the component can meet its intended function for a given period of time, and three means that it exceeds expectations...”</p>	<p>Recommended Action Change: OS-1.1: Park Needs Assessment And Master Plan. Create, adopt, and implement a park needs assessment and master plan, <u>based on community input</u>, defining park service areas according to best practices, establishing a service area for each park facility, creating a tool to evaluate needs and prioritize improvements by quadrant or appropriate geographic subarea, and maintaining a list of priorities for the expansion and improvement of open space and recreational facilities in each quadrant or geographic subarea to attain a park land standard of <u>3</u> acres per 1,000 residents.</p>	<p>Draft General Plan Action 1.1 identifies a needs assessment, master plan and mechanisms to guide all future park development and establish a methodology to prioritize park improvements, evaluation of needs and measures of how those needs are met. Both the San Pablo example and the actions included in Santa Ana's Draft Plan achieve the same goal, establishing a system by which to rank or prioritize park improvements and developments. Moreover, the Action has been modified OS-1.1 to emphasize community input and increasing the park standard to three (3) acres per 1,000 residents.</p>	<p>MPNA Attachment IV, 2.18.22</p>

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
151	Santa Ana Suggests: Action CM-3.6 Fresh and healthy foods. “Pursue programs, incentives, and/or grants to encourage urban agriculture and small grocery or convenience stores to sell fresh foods in the city, especially those within environmental justice area boundaries. Examples include grants or loans to purchase updated equipment, publicity, or directories of healthy food outlets, or connecting stores to wholesale sources of healthy, local, or organic food.” Santa Ana Is Missing: A policy to measure and increase fresh and healthy food access for environmental justice communities Santa Ana Could Adopt: A policy more like that of the City of Chino’s Policy P4 “In areas identified as underserved with healthy food sources, the City shall consider financial incentives to attract grocery store-anchored retail centers” with Actions A2-A5 to “Conduct a study to identify areas of the City that are underserved by grocery stores... attract retail that is currently lacking, such as grocery stores, work with brokers and existing stores to identify sites that could be appropriate for a specific store... Monitor vacancy rates and sales tax performance for retail areas in the City... [and] Actively recruit retail stores by marketing available sites and devoting staff time to working with potential tenants”	Recommended New Action: <u>CM-3.6A: Food Deserts. Collaborate with Orange County Health Care Agency (OCHCA) to gather and map food desert data, and share publicly through the City's Environmental Quality webpage.</u>	Food deserts were researched as part of the development of the draft General Plan. That research revealed that no food desert areas currently exist in Santa Ana. To monitor and visualize this data, staff recommends adding a new action to collaborate with OCHCA to gather and map data and make it available to the public through the Environmental Quality webpage (webpage is proposed as part of Action CN-1.10). Once the data is gathered and mapped, funds and effort resulting from Action CM-3.6 to create a program to expand fresh and healthy food options in the City and can be tailored and targeted at any areas that may develop into food deserts over time.	MPNA Attachment IV, 2.18.22
152	Santa Ana Suggests: Policy CM-3.2 Healthy Neighborhoods “Continue to support the creation of healthy neighborhoods by addressing public safety, use conflicts, hazardous soil contamination, incompatible uses, and maintaining building code standards.” Santa Ana Is Missing: A policy that identifies how such public safety issues will be identified and addressed Santa Ana Could Adopt: A policy more like that of the City of Alameda’s Policy 4.2 “Stimulate neighborhood and community improvement by providing financial and technical assistance in the form of low interest loans, technical assistance and code enforcement,” Policy 4.9 “to support programs designed to rehabilitate deteriorated units and encourage the maintenance and minor repair of structurally sound housing units,” and Policy 4.13 “to provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program.”	A number of policies and actions address this comment.	Providing healthy neighborhoods, specifically safe and sanitary housing as referenced in the comment, is of great importance and is addressed in both the General Plan Update and the Housing Element Update. The General Plan Update provides actions to help build and strengthen community, while the Housing Element Update provides actions related funding for rehabilitation and maintenance, facilitating workshops for owners and renters to understand landlord-tenant responsibilities, and ensuring neighborhood safety and infrastructure are addressed through the Capital Improvement Plan. See actions CM-1.7, CM-1.8, OS-2.2, OS-3.2, LU-4.3, M-1.5, PS-1.6, HE-1, HE-2, HE-3, HE-4, HE-10, HE-11, and HE-12.	MPNA Attachment IV, 2.18.22
153	Santa Ana Suggests: Policy CM-3.3 Healthy Residential Programs “Invest in programs and public improvements that educate residents about opportunities to increase their physical activity and improve their health” Santa Ana Is Missing: A policy to educate the public on healthy residential programs Santa Ana Could Adopt: A policy more like that of the City of South Gate’s Policy P.3 “Information about community events should continue to be distributed to a wide range of community organizations including churches, senior facilities, schools, etc. using existing city-sponsored platforms such as the City website	A number of policies and actions address this comment.	Community engagement has been instrumental in the development of the General Plan Update and will continue to be instrumental to the decision making process moving forward. To that end, the Draft General Plan includes implementation actions to make community engagement and collaboration central to community education and decision making processes. See actions CM-1.1, CM-1.2, CM-1.3, LU-3.25.	MPNA Attachment IV, 2.18.22

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154	Santa Ana Suggests: Action S-2.4 Lead Contamination “Work with local and regional partners, such as Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health, to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with environmental justice stakeholders in proposing solutions to remove hazardous lead-contaminated soils in the city and with benchmarks to measure and track effectiveness of proposed programs.” Santa Ana Is Missing: A policy to test, measure, record, maintain, reduce, and eliminate existing lead contamination, especially in areas disproportionately impacted by existing lead contamination. Ensure contaminated sites are remediated before new development occurs Santa Ana Could Adopt: A policy more like that of the City of Richmond’s Policy HL-40 “Ensure that contaminated sites in the city are adequately remediated before allowing new development. Engage the community in overseeing remediation of toxic sites and the permitting and monitoring of potentially hazardous industrial uses. Develop a response plan to address existing contaminated sites in the city...” and Action HW9.K for “standards dealing with the safe management of hazardous substances... [that] should require soil testing at development sites where contamination is suspected...”	Existing Action: LU-3.29: Development Site History. Update the City’s Development Review application process to require developers to provide information regarding the prior use of the site and history of hazardous materials on the property, in order to identify potential for site contamination from hazardous materials or soil lead contamination to be remediated.	The Draft Plan includes numerous actions aimed at addressing lead based contamination in the community, which were developed in partnership with community stakeholders. Lead contamination from non stationary sources like automobiles is a statewide problem and especially acute in urban environments where vehicle traffic is heaviest. The Draft Plan includes actions to help identify the exact cause of the pollution and to then seek funds to assist with remediation. The Draft Plan also includes actions to provide education related to renovations and construction on buildings that may have lead based products. Actions addressing lead contamination include S-2.4, LU-3.6, LU-3.17, LU-3.18, LU-3.19, LU-3.20, LU-3.21, LU-3.22, LU-3.24, LU-3.26, and LU-3.29.	MPNA Attachment IV, 2.18.22
155	Santa Ana Suggests: Policy CM-1.2 Community Input “Engage residents and community facility users to provide input for facility improvements and programming.” Santa Ana Is Missing: A policy that effectively involves community members in the decision-making process Santa Ana Could Adopt: A policy more like that of the City of National City’s Goal HEJ-1 “Meaningful and effective participation, promotion of community capacity building, and fair treatment of all segments of the public in the process of creating a healthy environment and developing, adopting, implementing, and enforcing environmental laws, regulations, and policies” with Policy HEJ-1.1 “Facilitate the involvement of community residents, businesses, and organizations in the development, adoption, and implementation of community health initiatives and consider their input throughout the decision making process” Policy HEJ-1.2 to “Consider environmental justice issues as they are related to potential health impacts...” Policy HEJ-1.3 “Consider environmental justice issues as they are related to the equitable provision of desirable public amenities...” Policy HEJ-1.5 “Assure potentially affected community residents that they have opportunities to participate in decisions that affect their environment and health, and that the concerns of all participants involved will be considered in the decision-making process” and Policy HEJ-1.6 “Hold meetings and workshops at times and locations that are convenient for community members to attend, especially those that may be directly affected by a particular decision”	A number of policies and actions address this comment.	The Draft General Plan contains various policies and implementation actions related to increasing community engagement and participation, with a focus on increasing participation from community members that reside in environmental justice areas and historically marginalized groups. See actions OS-1.15, OS-2.8, CM-1.2, CN-1.3, CN-1.11, CN-1.14, CN-1.15, LU-3.25, and policies LU-3.2, and CM-1.2.	MPNA Attachment IV, 2.18.22

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#	Public Comments/Concerns	Draft Policies and Implementation Actions Addressing Comments/Concerns	City Response	Source of Comment
156	Santa Ana Suggests: Policy LU-3.11 Air Pollution Buffers “Promote landscaping and other buffers to separate existing sensitive uses from rail lines, heavy industrial facilities, and other emissions sources. As feasible, apply more substantial buffers within environmental justice area boundaries.” Santa Ana Is Missing: A policy to designate appropriate distances or standards for buffer zones Santa Ana Could Adopt: A policy more like that of the City of East Palo Alto’s Policy 10.3 “Plant landscape buffers between Highway 101 and residential areas...” which designates specific locations for buffer zones or CARB’s suggestion that sensitive land uses be separated from industrial uses by at least a distance of 1,000 feet.	Existing Action: LU-3.2: Design Guidelines and Standards. Update the zoning code's development and operational standards for industrial zones to address incompatibility with adjacent uses, including minimum distance requirements to buffer heavy industrial uses from sensitive receptors. Conduct a study to evaluate and establish appropriate minimum distances and landscape buffers between polluting industrial uses from sensitive receptors such as residences, schools, day care, and public facilities.	Further analysis is required to determine what the appropriate buffer should be. If adopted, Action LU-3.2 will establish a process by which to study relevant data and best practices, to arrive at an appropriate distance, not simply choosing an arbitrary distance.	MPNA Attachment IV, 2.18.22
157	South Bristol Street Land Use Focus Area: Redesignate the eastern block of Bristol Street between MacArthur and Alton Ave to UN-40 instead of DC-2. The designation is a better transition with the adjacent neighborhood to the east.	Amend General Plan Land Use Map	Map has been modified to reflect City Council.	City Council
158	Recommended Action: LU-2.15: Community Serving Commercial Retail & Service Diversity Impact Analysis. Implement a requirement for mixed-use projects or proposals to convert commercial and other non-residential uses to residential or mixed-use projects to complete a community serving commercial retail & service diversity impact analysis to inform the decision making process and to ensure availability and diversity of commercial retail and service uses as part of the development proposal.	Recommended Action: LU-2.15: <u>Community Serving Commercial Retail & Service Diversity Impact Analysis. Implement a requirement for mixed-use projects or proposals to convert commercial and other non-residential uses to residential or mixed-use projects to complete a community serving commercial retail & service diversity impact analysis to inform the decision making process and to ensure availability and diversity of commercial retail and service uses in Santa Ana as part of the development proposal.</u>	Staff is proposing the Action to maintain the availability and a balanced mix of community serving commercial retail and service uses within the City.	Staff