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September 14, 2020

Chairman McLoughlin and Planning Commissioners

City of Santa Ana

Santa Ana CA 92702

**Subject: Public and Agency Review of Draft Program Environmental Impact Report [DPEIR]
(45 days) August 3, 2020 to September 16, 2020**

Once again, the City of Santa Ana is requesting a commission to vote on an issue prior the end of the public review period. Why? **And more importantly, is this even legal?** The General Plan Elements lack an implementation plan in over 91 percent of the areas to be discussed. Again, making it difficult for the public to evaluate. Even though the City states *that “no changes are being proposed to the Housing Element, which is adopted under a separate process regulated by State housing law”*, it should still be included as a document for the comprehensive update. There are too many issues in the housing element that will conflict with the comprehensive update to ignore.

Any movement by the Planning Commission to move this item forward for City Council review/approval should be delayed until the public has been given their right to voice their concerns and the City in given time to produce all required documents prior to taking any action towards approval.

Given all this, I would like to address a few issues. I already know for the most, the answer will be either “that is not an environmental issue” or “its significant and unavoidable”. It is also interesting to note traffic and congestion are no longer a CEQA issue but is one of the major concerns of most residents since it impacts quality of life not only for current residents, but future residents as well. This can be addressed indirectly by limiting the population growth in the second densest city in the state of California.

The *Executive Summary* says a lot about the lack of concern for public comments. It states, ***“There are no specific areas of known controversy concerning the GPU”***.

The Notice of Preparation review cycle occurred in the Feb/March timeframe and the scoping meeting occurred on March 5, 2020. A timeframe when people were first realizing the threats of COVID-19. I realize business must move forward but the City is marching down the path as if COVID-19 was not changing anything.

Ten out of 64 impact areas are considered ***significant and unavoidable.***



The DPEIR states on page 2-18:

“The City will work closely with cities adjacent to [sic] General Plan Focus Areas when preparing the City of Santa Ana’s Parks and Recreation Master Plan to ensure that the Dyer/55 Focus Area and other growth areas of the City provide additional recreation, parks, and core services essential in making complete communities.

Yet the Bowery Project, which is almost approved, does not provide any park space and the concerns of the City of Tustin were ignored.

The Parks Master Plan will hopefully define and guide the City’s strategies and investments in the coming years. But where is it? Shouldn’t this be completed in conjunction with the **“comprehensive”** update to the General Plan and be included in the DPEIR? Without it we are just setting the City up for a piecemeal product.

5.15 RECREATION

There is a significant disconnect in open space analysis.

Table 5-15.2: Total Existing And Planned Parkland Acreage

Required Acreage	Existing Acreage from Table 5-15.2	Existing Deficiency	Acres per 1000 Residents
669.5 acres	354.36 acres	315.14	1.058

Table 5-15.3: Existing vs. Required Parkland Acreage

Required Acreage	Existing Acreage from Table 5-15.2	Existing Deficiency	Acres per 1000 Residents
669.5 acres	561.94 acres	107.56	1.68

Using the 116 acres of open space area in the Santa Ana River corridor, the 42.64 acres of SAUSD joint-use school park and the 36.89 acres of hiking trails and bike trails, and the 13.89 acres of sports facilities, to arrive at a total of 561.94 is cooking the books. You may as well include the 2.57 acres of publicly accessible open space listed in the Bowery project and any other future developments.

I believe the information in provided in Table 5-15.2 is correct when it addresses **Total Existing And Planned Parkland Acreage**. We are park poor and nothing is being done about it. Analysis needs to be redone to reflect how poorly Santa Ana is addressing this issue. The author put this information in the DPEIR so do not say it’s not relevant to the DPEIR. **Why isn’t there a significant reference to increasing open space over the next 25 years?**



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5.16 TRANSPORTATION

Section 5.16: Figure 5.16-4 -The Master Plan of Bikeways includes paths that travel thru private property. No analysis supports this.

I am also concerned about adding more high-density housing in the City and how the General Plan "Shared Vision" only addresses development versus quality of life initiatives. Housing element should be a part of this analysis whether that element is being revised or not. I realize this is not EIR stuff.

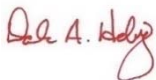
Too much emphasis is being placed on the focus areas and not enough on the rest of the City.

While I agree the City needs revenue, but we cannot continue down this path of constantly increasing the density of the City. The COVID pandemic highlights the negative effect high density has on the spreading of viruses. Where do you want the City to be when the next pandemic occurs?

In summary, the DPEIR is a document for development in Focus Areas. It is a document based on an incomplete General Plan, which in turn, does not reflect a "Shared Vision for the Future".

Thank you for your time. Stay safe, stay healthy.

Respectfully,



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