

From: [Diane Fradkin](#)
To: [McLoughlin, Mark](#); [Contreras-Leo, Cynthia](#); [Nguyen, Kenny](#); [Rivera, Felix](#); [Phan, V. Thai](#); [Garcia, Norma](#); tmorrissey@santa-ana.org
Cc: [eComment](#)
Subject: November 5th PC Hearing - General Plan Update - Land Use Map Comments
Date: Saturday, October 31, 2020 5:01:34 PM
Attachments: [ltr to minh thai GPU land use and definitions oct 2020.pdf](#)

Honorable Planning Chairman & Commissioners:

Attached is my comment letter regarding the proposed Land Uses for the 5 Zones in the GPU.

Here are my general comments to the Land Use Map and Definitions:

GENERAL OVERVIEW

1. The Citizens of Santa Ana have voiced their opposition to unrestrained density increases in our City. Each Community Meeting conducted by the Planning Department, and which I've participated, the general and *overwhelming comments are that the City is already too dense, too intense and too congested to support more intense uses and densities*. And yet, here we are.....unrestrained proposed densities throughout the City.
2. The way we live now post-Corona Virus is much different than when Planning embarked on this GPU journey a few years ago. It appears that this has not been factored into the Land Use Densities.
3. I'm surprised that there still is "N/A" in the Park/Open Space component in your Table LU-3 "Density and Intensity Standards". **This needs to be rectified.**
4. The proposed new land uses and densities overall are way too intense....is there really a need for the DC-5 category of 125/DUA and 25 stories in height?? Do we really need the UN-50 category of 50/DUA and 6 stories?? Do we really need CR-30 with 30/DUA and call that "Medium Density"?? This one especially is false advertising if you want to say its Medium Density but has 30/DUA.....its like saying Jumbo Shrimp!

Here are my overview comments to the Land Use Designations & Map (see attached letter for more detail). **I am particularly concerned with the missing Park/Open Space component and request the following:**

1. I strongly recommend that the Planning Department provide a breakdown table of what each land use category is required to dedicate as Park acreage. This is a glaring hole in the Table LU – 3 Density and Intensity Standards. Planning could provide a note to see "Table ____" for Park Acreage Requirements. In the

subsequent Table, there needs to be a footnote discussing the City's deficit Park acreage which also should be added to the mix.

2. I strongly recommend that in Figure LU-11 Land Use Map – Grand Avenue & 17th Street, that based on the proposed and my revised Land Use Designations for this zone (see attached letter for specific details to my revised Land Use Designations), add a category for “Required Park Space” and give the acreage number based on the zone's proposed and revised land use designations. This will be called out, but not specifically assigning it to a particular property which has always been a concern of the Planning Department. This absolutely needs to be included to avoid falling into a greater Park space deficit which is an injustice to the Citizens of Santa Ana as well as bad planning practices.

Thank you for the opportunity to provide comments. We all want what is best for our City. I hope that you will consider having the Planning Department continue to fine tune the GPU....Draft Program EIR and most importantly, the Land Use Definitions and Map based on the comments provided by the Citizens of Santa Ana.

Respectfully Submitted,

Diane Fradkin
28-year resident of Santa Ana
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Sent from [Mail](#) for Windows 10

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October 6, 2020

VIA EMAIL & US MAIL

Minh Thai
Planning Director
City of Santa Ana Planning & Building Agency
PO Box 1988 (M-20)
Santa Ana, CA 92702

RE: Comments to the Santa Ana General Plan Update Land Uses and Definitions

Dear Minh:

Thank you for the time you and the Planning Department have invested and for the opportunity to comment on the GPU Land Uses and Definitions.

GENERAL OVERVIEW

1. The Citizens of Santa Ana have voiced their opposition to unrestrained density increases in our City. Each Community Meeting you've conducted and which I've participated, the general and overwhelming comments are that the City is already too dense, too intense and too congested to support more intense uses and densities. And yet, here we are.....
2. The way we live now post-Corona Virus is much different then when you embarked on this GPU journey a few years ago. It appears that this has not been factored into the Land Use Densities.
3. I'm surprised that there still is "N/A" in the Park/Open Space component in your Table LU-3 "Density and Intensity Standards". This needs to be rectified.
4. The proposed new land uses and densities overall are way too intense....is there really a need for the DC-5 category of 125/DUA and 25 stories in height?? Do we really need the UN-50 category of 50/DUA and 6 stories?? Do we really need CR-30 with 30/DUA and call that "Medium Density"?? This one especially is false advertising if you want to say its Medium Density but has 30/DUA.....its like saying Jumbo Shrimp!

Figure LU-11 Land Use Map – Grand Ave & 17th Street

My comments are as follows...

1. The UN-40 designation at 4th and Grand is too high. I recommend that this be changed to UN-30 for this area. With everything else proposed, this will just provide more intensity to an already busy area.
2. The UN-30 designation at 17th & Grand is still too high. Yes, you've lowered it from UN-40, but it really needs to be UN-20 as I stated previously because of the proximity adjacent to SFR, constraints with access on 17th Street and the Railroad and proposed future Railroad grade separation for the undercrossing.
3. The UN-30 designation along Grand closest to the 22 Fwy is adjacent to SFR in some areas and this is just to intense along with 4 stories being too high adjacent to single story SFR.
4. I see in your "Notes" that you have clarified the open space here as part of the Railroad Operations. Again, I think you need to change the color to yellow or orange and not green as green implies usable park or open space. Please change the color to anything but green.
5. Change the Edison Substation and Post Office at Grand and Santa Clara to "Institutional".
6. For this section key, you need to provide a Park calculation based on these proposed and revised (based on my recommendations) land uses to actually have an acreage category for Park Space. You will also need to proportionally add the known deficit Park acreage to this area so that this can be incorporated into the 17th & Grand Park area of the proposed GPU.
7. Item 6 should be applied to all of the GPU zones with a proportional share of the known Park deficit for each zone along with the Park acreage based on the proposed land uses.

Table LU-3 Density and Intensity Standards

My comments are as follows....

1. Remove Medium Density Residential (CR-30)...as mentioned above, this is not Medium Density! 30/DUA is too dense to be called Medium Density.
2. It is very misleading to the Citizens of Santa Ana to show "N/A" next to Open Space. You already have a Park deficit because of bad planning practices, this just fans the flames! Please include a calculation which shows what the actual Park requirements are here for each of the land use categories...this absolutely needs to be called out.
3. Professional & Administrative Office POA and POA-1 should be 2 stories, not 3 stories. You have other categories in this section that allows 3 stories. POA and POA-1 need to be revised back to 2 stories.
4. Remove Urban Neighborhood – Medium High (UN-50)...this is not necessary. UN should only be up to 40/DUA. You have other DC zoning that accommodates a higher DUA which is where it belongs. Delete UN-50.
5. Change District Center – Medium Low (DC-1.5) to maximum of 8 stories...not 10.
6. Delete District Center – High (DC-5). This is just unrealistic and not at all warranted for our City at this time. Please remove.

I would be happy to sit down with you to further discuss my comments. I am particularly concerned with the missing Park/Open Space component and request the following:

- A. I strongly recommend that you provide a breakdown table of what each land use category is required to dedicate as Park acreage. This is a glaring hole in your Table LU – 3 Density and Intensity Standards. You could provide a note to see “Table ___” for Park Acreage Requirements. In the subsequent Table, you will need a footnote discussing the City’s deficit Park acreage which also should be added to the mix.
- B. I strongly recommend that in Figure LU-11 Land Use Map – Grand Avenue & 17th Street, that based on the proposed and my revised Land Use Designations for this zone, you add a category for “Required Park Space” and give the acreage number based on the zone’s proposed and revised land use designations. You will be calling it out but not specifically assigning it to a particular property which has always been your concern. This absolutely needs to be included to avoid falling into a greater Park space deficit which is an injustice to the Citizens of Santa Ana as well as bad planning practices.

Respectfully Submitted,

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28-year Santa Ana Resident