From:	Diane Fradkin
To:	eComment
Subject:	Fw: November 5th PC hearing - General Plan Update - Draft Program EIR Comments
Date:	Sunday, November 01, 2020 7:21:50 AM
Attachments:	ltr to verney gen plan update comments sept16 2020.pdf

Same here....can you please forward to Tom Morrisey....thanks! Diane

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From: Diane Fradkin
Sent: Saturday, October 31, 2020 4:32 PM
To: McLoughlin, Mark <mmcloughlin@santa-ana.org>; Contreras-Leo, Cynthia <ccontreras-leo@santa-ana.org>; Rivera, Felix <frivera@santa-ana.org>; knguyen@santa-ana.org <knguyen@santa-ana.org>; tmorrissey@santa-ana.org <tmorrissey@santa-ana.org>; Phan, V. Thai <vphan@santa-ana.org>; ngarcia10@santa-ana.org <ngarcia10@santa-ana.org>
Cc: ecomments@santa-ana.org <ecomments@santa-ana.org>
Subject: November 5th PC hearing - General Plan Update - Draft Program EIR Comments

Honorable Planning Chairman & Commissioners:

Attached is the letter I submitted to Planning regarding my comments to the Draft Program EIR.

Here are my general observations:

GENERAL COMMENTS
The future of Santa Ana is in your hands. A creative vision for each of the Focus Areas is needed, but there is also a practical side to how the areas are re-envisioned. A balance needs to be achieved so that the future planning requirements, what the current existing infrastructure can support and what can actually be implemented and developed, all align.

Right now, this document is not in alignment and is out of balance. I believe that a reduced project with less intensity and density would create a better balance between the Planning Department's goals and the needs of the Citizens of this community.

There are *2 items* that have not been considered as part of the overall methodology of developing the land use element and analysis for the Program EIR….

One is that the Citizens who participated in all the outreach meetings conducted by the City emphatically spoke out regarding their concerns for the intense density increase proposed in the 5 Focus Area zones and yet, their voices were not heard.

The City of Santa Ana is one of the densest Cities in the US and what has been proposed as part of the General Plan Update is an extensive density increase throughout most of the 5 zones. The City's infrastructure can handle some density increase, but certainly not what is currently proposed.

The *second item* is how we need to adapt our everyday living situation post-Corona Virus.

The overall philosophy of how we live, work and interact post-Corona Virus is changing our landscape. There has been more of a need to shelter in place and this has demonstrated a preference for single family homes. The high density - high rise buildings are not where people want to live if they have to shelter in place and social distance. These high density projects will likely become less desirable going forward. Planning more new construction of this type of housing is not what we need for the future.

Also, more people are working from home. Those working from home ideally work from a home office and so a designated office space is needed and desired in the home. If one is working from home, there is less need for Transit Oriented Development since they are not commuting on a daily basis.

Because more people are working from home successfully, companies are realizing they no longer need large amounts of office space to house all of their employees. Some companies will decide that they don't need any office space at all and others will lease a much less amount. There will likely be a glut of vacant office space in the near future.

One of the features which needs to be considered as part of the GPU Program EIR is the repurposing and adaptive reuse of existing office space. Some office buildings could be repurposed into residential housing and even affordable housing where applicable. There needs to be more of an in-depth study of this so that we aren't just focused on adding density and new construction to all 5 of the zones, but looking at where adaptive reuse for residential (and other appropriate uses) would work best.

If these items are not considered as part of the GPU Program EIR, you will have a GPU that is already out of date before its even approved.

In summary.....based on my review and comments, I would suggest the following recommendations for the Draft Program EIR for General Plan Update:

A. Prepare a "preferred" project that is a blend of the "Reduced Intensity Alternative" and the "2020 TRP Population/Housing Consistency Alternative". This would 1) create a less dense and intense GPU Preferred Project compared to the current GPU August 2020 project as presented in the Program EIR, 2) still achieve the goals of the Planning Department and 3) would likely be better embraced by the Community.

B. Redraft and reanalyze this GPU Program EIR so that it factors in the rethinking and methodology of the post-Corona Virus adapted way we now live, work and commute today and in the future.

C. Include a park acreage component for the City's deficit amount of park lands plus what each Focus Area will require based on the land uses and density in each zone. Add this acreage total to the land use maps and keys for each of the Focus Areas as well as in the GPU narrative for each of the

Focus Areas in order to incorporate, through the planning process and actually construct, the much needed park land throughout the City.

D. As good stewards of the City of Santa Ana and following best planning practices, strive to create a good balance of uses and benefits for the City and its Citizens, now and in the future.

E. Revise the Program EIR based on a new “preferred” project as well as incorporating the other comment items mentioned and recirculate for an additional 45-day public review.

Thank you for the opportunity to provide comments to this GPU Program EIR and thank you for your commitment to make the City a better place for the future.

Respectfully Submitted,

Diane Fradkin
28-year Santa Ana Resident
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September 16, 2020 *VIA EMAIL & US MAIL*

Verny Carvajal, Principal Planner
City of Santa Ana Planning & Building Agency
PO Box 1988 (M-20)
Santa Ana, CA 92702

RE: Comments to the Program EIR for the Santa Ana General Plan Update
State Clearinghouse Number: 2020029087

Dear Mr. Carvajal:

Thank you for your efforts, along with your team, in preparing the General Plan Update (GPU) Program EIR for the City of Santa Ana.

GENERAL COMMENTS
The future of Santa Ana is in your hands. A creative vision for each of the Focus Areas is needed, but there is also a practical side to how the areas are re-envisioned. A balance needs to be achieved so that the future planning requirements, what the current existing infrastructure can support and what can actually be implemented and developed, all align.

Right now this document is not in alignment and is out of balance. I believe that a reduced project with less intensity and density would create a better balance between the Planning Department's goals and the needs of the Citizens of this community.

There are 2 items that have not been considered as part of the overall methodology of developing the land use element and analysis for the Program EIR….

One is that the Citizens who participated in all the outreach meetings conducted by the City emphatically spoke out regarding their concerns for the intense density increase proposed in the 5 Focus Area zones and yet, their voices were not heard.

The City of Santa Ana is one of the densest Cities in the US and what has been proposed as part of the General Plan Update is an extensive density increase throughout most of the 5 zones. The City's infrastructure can handle some density increase, but certainly not what is currently proposed.

The second item is how we need to adapt our everyday living situation post-Corona Virus.

The overall philosophy of how we live, work and interact post-Corona Virus is changing our landscape. There has been more of a need to shelter in place and this has demonstrated a preference for single family homes. The high density - high rise buildings are not where people want to live if they have to shelter in place and social distance. These high density projects will likely become less desirable going forward. Planning more new construction of this type of housing is not what we need for the future.

Also, more people are working from home. Those working from home ideally work from a home office and so a designated office space is needed and desired in the home. If one is working from home, there is less need for Transit Oriented Development since they are not commuting on a daily basis.

Because more people are working from home successfully, companies are realizing they no longer need large amounts of office space to house all of their employees. Some companies will decide that they don't need any office space at all and others will lease a much less amount. There will likely be a glut of vacant office space in the near future.

One of the features which needs to be considered as part of the GPU Program EIR is the repurposing and adaptive reuse of existing office space. Some office buildings could be repurposed into residential housing and even affordable housing where applicable. There needs to be more of an in-depth study of this so that we aren't just focused on adding density and new construction to all 5 of the zones, but looking at where adaptive reuse for residential (and other appropriate uses) would work best.

If these items are not considered as part of the GPU Program EIR, you will have a GPU that is already out of date before its even approved.

GENERAL PLAN UPDATE PROGRAM EIR COMMENTS
The following are my comments to the Program EIR…..

1. Figure 3-13 Grand Ave/17th St Focus Area Existing vs. Proposed Land Use – *my comment has to do with the "Open Space" designation as show on the key for the Proposed section…..the actual open space you are calling out is part of the rail road easement which includes 2 railroad tracks, a decorative wall and some landscaping. This open space is not at all usable to the general public. I don't think this space should be included as open space for the proposed section because it's not useable to the public and so is misleading as it just appears that there is more open space then there really is. I would recommend that you call it out as Railroad ROW which is what it really is.*
2. Figure 3-15 55 Fwy/Dyer Rd Focus Area Existing vs Proposed Land Use – *my comment has to do with re-thinking the District Center land use area and*

consider a "repurposing/adaptive reuse" category for some of the area where applicable. Also, some of this area is under the flight path for John Wayne Airport and in some cases, the planes are only 700 feet above the building. Not sure if District Center is the appropriate use based on this information as the 2 recently approved projects, The Heritage/Broadstone/Arden and the Bowery both have roof top decks and makes it difficult to utilized this open space when planes are flying over in 4 minute increments. (See comment #23 for more details).

3. Page 3-51…..bullet points – *my comment is to add a bullet point that specifies "promote open space and park uses as a design feature of this area". The Grand Ave/17th St Focus Area should have a park use focal point, "Grand Park" and the exact acreage calculation should based on the proposed density and land uses plus the appropriated deficit amount for the deficient park lands. In fact, this bullet point and definition should be applied to all the Focus Areas.*
4. Page 3-51….last paragraph of Grand Ave/17th St Focus Area – *my comment is that language should be added which reflects that at a minimum, the overall planning of the Medical Arts and adjacent Shopping Center at the NWC of 17th St/Grand Ave shall be planned as a Specific Plan. Consideration should be made to also include, in the same Specific Plan, the entire corridor of Grand Ave (and adjacent lands) from the 22 Fwy to the 5 Fwy, if appropriate. Please revise.*
5. Page 3-53….3.3.2.4 Specific Plan/Special Zoning – *my comment is to include language to the first paragraph in this section regarding including a designation for a Specific Plan for the Medical Arts & adjacent Shopping Center at the NWC of 17thSt/Grand Ave (and entire corridor of Grand Ave and adjacent lands from the 22 Fwy to the 5 Fwy, if appropriate). But at a minimum, the Specific Plan shall encompass the Medical Arts & adjacent shopping center properties. Please update accordingly.*
6. Page 3-55…..after Transit Zoning Code Specific Development – *my comment is to add an additional paragraph which addresses a Specific Plan to be prepared for the future development of the Medical Arts & adjacent Shopping Center at the NWC of 17thSt/Grand Ave (and entire corridor of Grand Ave and adjacent lands from the 22 Fwy to the 5 Fwy if appropriate). But at a minimum, the Specific Plan shall encompass the Medical Arts & adjacent Shopping Center properties.*
7. Table 3-7 GPU Existing & Buildout Population – *my comment is to the percentage increase of the population due to the buildout of the proposed GPU….this increase is tremendous in a City that has a fixed and aged infrastructure and question how this would actually be implemented and supported. The intensity of the population increase and proposed GPU density increase is unsustainable and should be reduced to a level that the current existing infrastructure can support. Please revise.*
8. Table 3-8 Existing Conditions, Potential Growth and Buildout Conditions: Housing Units, Nonresidential Square Footage and Jobs – *my comment is that 3 of the 5 GPU Focus Areas under the Growth Scenario will be losing jobs in the amount of 4,473 for an increase of 15,839 housing units in the Buildout Scenario. Why does the City want to sacrifice all these jobs? This doesn't help with the jobs/housing balance….this puts the balance in an imbalance. Therefore, the proposed GPU density should be reduced and jobs kept so that there is more of an even jobs/housing balance.*

9. Table 3-9 Existing and Buildout Dwelling Unit Breakdown – *my comment is that the proposed GPU density is losing SFR during a time when there is more demand for SFR due to the Corona Virus and <u>doubles</u> the amount of Multi-family Units compounding the density of a City that is rank #4 in the US as one of the densest Cities. I understand that we have state mandated requirements but more than doubling the Multi-family Units is not sensible planning. Some increase is appropriate, but the proposed GPU density increase is at a level that can't be supported by the current infrastructure. Therefore, the proposed GPU density needs to be reduced.*
10. Page 4-3…Senate Bill 743 – *my comment is that what SB743 was trying to accomplish upon its establishment in 2013 needs to also factor in recent information as part of the GPU analysis given the Corona Virus and how our actions have changed due to Corona Virus along with more Electric Vehicles on the road in CA. For example, 1) more people are working from home, 2) the general population is not taking public transit as they had previously because of Corona Virus and the risks of being in close proximity of others and there is also a reduction of traffic trips due to the option of working from home and 3) there are more Electric Vehicles in CA and therefore, less gas cars. All of these additional items need to be factored into the methodology of thinking when evaluating Greenhouse Gas Emissions.*
11. Page 4-5…Grand Ave and 17th St Focus Area – *my comment for this paragraph has to do with the last sentence…..the USPS North Grand office and the Edison Substation should be designated as "Institutional" and "Utility" as this is what the existing uses are and should continue to be in order to serve the community, not Urban Neighborhood. I would recommend that this change be made to your land use designation maps and keys.*
12. Page 4-14 4.4.1 General Plan; bullet points – *my comment has to do with the first set of bullet points "Land Use Element" and "Open Space, Parks and Recreation Element"….these updated plans need to be available to review and comment on prior to the approval of the Program EIR. Please provide these as soon as possible for public comment.*
13. Page 4-14 4.4.1 General Plan; bullet points – *my comment has to do with the second set of bullet points….add a bullet point for "Future Grand Ave/17th Street Specific Plan".*
14. Table 5.1.1 Intensity and Height Comparison: Current General Plan vs GPU – *my comment has to do with the Grand Ave/17th St Section….the Urban Neighborhood designation shows 119.7 acres as part of the GPU and FAR of 1.5 or 40/DUA with a maximum height of 4 stories. As part of the community outreach conducted by the City, the citizens responded time and time again stating that additional intense density is not sustainable for our City. I have specifically stated to the Planning Department at the meeting on July 31, 2020 and again in an email dated August 6, 2020 that 40/DUA is too intense and believe that **20/DUA** would be more appropriate for a city that is already the 4th Densest City in the US. As it relates to the height, 3 stories for residential and <u>only 4 stories</u> when the bottom story is retail/commercial/office and then 3 stories of residential above for a total of 4 stories. This change needs to be made as the citizens of Santa Ana have spoken at the outreach meetings specifically about*

the unsustainability of additional density to our City. This is a more reasonable increase (20/DUA) which I believe the community can support.

15. Page 5.1-7…last paragraph of the Grand Ave and 17th St Focus Area – *my comment is to include language regarding preparing a Specific Plan for the Medical Arts & adjacent Shopping Center located at NWC of Grand Ave/17th St (and entire corridor of Grand Ave and adjacent lands from the 22 Fwy to the 5 Fwy if appropriate). But at a minimum, the Specific Plan shall encompass the Medical Arts & adjacent shopping center properties.*
16. Figure 5.1-2 – Artist Rendering of Urban Neighborhood Land Use Designation – *my comment is that this picture depicts a 4-story building adjacent to a single story SFR home. <u>This should not be allowed</u>. 4 story buildings under the Urban Neighborhood Land Use shall have one story of retail and three stories of residential. If all residential, then the maximum height shall be 3 stories.* ***But in no case shall a 4-story building abut a single story or two story SFR home****. This needs to be noted in this Program EIR and included in the zoning requirements. Lastly, this picture needs to be changed so that it does not depict a 4-story building adjacent to a SFR home.*
17. Page 5.1-30 Conclusion – *my comment has to do with the first paragraph here….the citizens of Santa Ana have spoken numerous times at the community outreach meetings stating that additional intense density is not sustainable for our City, but what is written here goes directly against what the citizens want. The GPU needs to reduce the proposed intensity and density for all 5 Focus Areas, my specific concern is the Focus Area of Grand Ave/17th St which definitely needs to be downgraded as to the density and intensity. What is proposed in the GPU is a significant impact and therefore, the proposed density needs to be reduced in order to reduce the impacts generated by this proposed GPU density. Please revise accordingly.*
18. Page 5.2-24 Land Use Element – Policy 1.6 Transit Oriented Development – *my comment is that post Corona Virus has us looking at public transit differently as most individuals don't want to be exposed to the risks of Corona Virus in close quarters such as public transit and so, there is now less demand for this. Also, more employees are working from home and therefore, are not having to commute. So, this policy doesn't apply today as it did at the beginning of the year. The methodology post-Corona Virus world needs to be incorporated in the re-thinking and revision of this policy.*
19. Page 5.4-18 Grand Ave/17th St – *my comment has to do with this paragraph, 3rd sentence….its states "3 lanes". This is incorrect. The section of Grand Ave between 22 fwy and 5 fwy is not entirely 3 lanes on both sides; there are many sections where there are only 2 lanes. So, the question I have is: in the areas where there are only 2 lanes on Grand Ave, is the City planning on making those sections 3 lanes as part of the GPU? If that's the case, it is not specified in this document. Please correct this statement with the analysis of actual facts and proposed implementation and update and recirculate.*
20. Page 5.4-27 Level of Significance Before Mitigation….Impact 5.4-1 would still be potentially significant – *my comment is that there needs to be language inserted in this document that states each individual new infill project shall address and appropriately mitigate to a less than significant level any impact to Historic Resources. It is important that we protect our historic resources, especially*

facades of old buildings, monuments and other appropriate historic items. The City's Historic Resources Committee needs to look at each infill project which is proposed to the Planning Department and provide findings to the developer so that nothing is passed over.

21. Page 5.10-14 Open Space Element Policy 1.5 Development Amenities – *my comment is that this policy has not been followed in the past and has no teeth. The most recent high-density projects approved such as The Mark, The Heritage and the Bowery, as well as the many projects along First Street between the 55 Fwy and 5 Fwy have not provided "open space" per this policy. I believe that there needs to be a mandated percentage of the project that equates to a specific amount of open space acreage (and sorry, balconies and sidewalks should not count!) on site for the residents to use along with the formulated number of park acres/park fee based on the density for an offsite park area in a nearby location. Otherwise, its nice to have a policy that says "Ensures all new development provides open space…", but it needs to be better defined for a city lacking of open space and park space and is already the 4th densest City in the US. I would recommend that you add specific language as outlined above to this policy so that there is not the continued deficit of park land for our City.*
22. Page 5.10-15 Land Use Element Policy 2.5 Benefits to Mixed Use – *my comment here is that under this policy it talks about "improve jobs/housing balance". I believe this is important, however, by way of the proposed GPU, it reduces the number of jobs and instead increases the density. Therefore, the GPU as proposed doesn't not support "improve jobs/housing balance" as outlined in Policy 2.5. Reducing the GPU density would allow for more compliance with Policy 2.5 and is recommended. Please revise accordingly.*
23. Page 5.10-19 Impact 5.10.2 The GPU would be consistent with the AELUP for the John Wayne Airport – *my comment is that I would completely disagree with the findings that this is less than significant. The Dyer/55 Fwy area has a lot of District Center shown. Also, the ALUC recently disapproved the Bowery project. The logistics of this area is that the planes descent for landing directly above and are approximately 700 feet from the top of this building. This occurs at a rate of approximately every 4 minutes during peak hours as noted in the ALUC hearing minutes from May of 2020. The constant noise level from the airplanes path for landing, even with double paned windows, may not provide a less than significant finding and certainly enjoying the roof top deck areas would be awful (same thing with the Heritage/Broadstone Arden). That is why industrial/office is a much more compatible use for flight path areas than residential. (Guess they got it right the first time?!) Why have review and recommendations from the ALUC if the City thumbs its nose and just does whatever they want to do? The role of the City and Planning Department is to provide safe and good planning principles…..this certainly is not either. Outside of the Heritage and the Bowery, it would be wise to change the District Center use to the same adjacent use of "Industrial/Flex" and "Live/Work" for the Dyer/55 Fwy zone.*
24. Page 5.10-22 Table 5.10-1 RTP/SCS G4 – Bullet Point 8 "…encourage transit oriented development….concentrated development of high quality transit corridors to reduce vehicle miles traveled" – *my first comment regarding this last bullet point is that due to the Corona Virus, the desirability of living in a high density high rise and the use of public transportation has lost its luster for the*

general population. The GPU needs to factor this into the methodology and thinking of this document. More people are working from home and when sheltering in place, desire to be in a SFR. Because they are working from home, the need to commute is lessen, the need to use public transportation to commute to work is lessen. Therefore, the need to do more transit oriented development has now lessen (this is the old way of thinking). Instead, there should be more of a focus to do repurposing and adaptive reuse of current and future vacant office buildings due to Corona Virus and more companies having people working from home, therefore needing less office space. I think that it would better serve the community to make this exchange in your document as it is a much more reasonable thought based on the current situation and facts.

The second comment has to do with the sentence that states: "…and concentrated development of high quality transit corridors to reduce vehicle miles traveled." I'm unfamiliar with the term "high quality transit corridors" and so not sure exactly what this means or what you want to achieve? Please provide clarification of what this land use policy means and some examples to better understand this statement and how it applies and the relevancy.

25. Page 5.10-24 Table 5.10-1 RTP/SCS G9 Bullet Point 2 – *my comment has to do with the definition of "high quality transit"…what exactly is this? Also, this again is an old way of thinking given where we are with the Corona Virus and how people are living, working from home and not commuting to the office as they did in the past. The use of public transportation has lost its luster to the general population due to the risks associated with the Corona Virus. The GPU needs to factor this into the methodology and thinking of this document. More people are working from home and when sheltering in place, desire to be in a SFR. Because they are working from home, the need to commute is lessen, the need to use public transportation to commute to work is lessen. Instead, there should be more of a focus to do repurposing and adaptive reuse of now vacant office buildings due to Corona Virus and more companies having people working from home and needing less office space.*

    On a side note: the repurposing and adaptive reuse of office space, certainly in downtown areas, is ideal for low income/affordable housing units and policy should be included to accommodate this.

26. Page 5.10-26 Table 5.10-2 LOS analysis for CMP Intersections – *my comment regarding this table is why it only shows the CMP intersections? What is the LOS of Grand Ave/17th Street intersection current and buildout per the GPU? What about the LOS for 17th Street/Lincoln Street intersection with the railroad tracks (and proposed future grade separation) current and buildout per the GPU? What is the LOS for Grand Ave/Santa Clara intersection current and buildout per the GPU? Please provide this information and analysis and recirculate.*
27. Page 5.12-13 Aircraft Noise – *my comment is that you have significant noise in the Dyer/55 Fwy area due to the path of the airplane's decent for landing which is approximately 700 feet above the Bowery building and roof top decks. There is no mention of this specific flight path in this section even though most decent paths lead to this location in order to line up with the runway at John Wayne Airport. Please revise to include this important information.*
28. Page 5.12-13 Railroad Noise – *my comment is that there is no indication in this section of the railroad noise directly affecting the Grand Ave/17th Street zone*

given the proposed GPU land use for this area of Urban Neighborhood. There is a section of this zone area (Medical Arts property) that is directly adjacent and shares a boundary with the 2 railroad tracks. Significant noise is generated by the Metrolink and Amtrak trains running these lines all day, every day and especially the freight trains that come through during the night-time. Please revise to include this important information.

29. Page 5.12-30 to 45…Impact 5.12-2: Buildout of the plan area would cause a substantial traffic noise increase on local roadways and could locate sensitive receptors in areas that exceed established noise standards….Level of Significance Before Mitigation: The proposed project would result in significant traffic noise increases – *my comment is that this can be mitigated by decreasing the proposed GPU density. Less density would generate less traffic trips. Again, the proposed GPU density is too intense and dense for the fixed infrastructure of our City which is ranked the 4th densest in the US. Re-analyze this section with less overall density of the 5 zones and incorporate the post-Corona Virus facts for living and commuting methodology to this GPU….this should help with creating a less than significant finding.*
30. Page 5.12-51 Impact 5.12.- 2….this paragraph states: "…Thus, traffic noise would remain a **significant and unavoidable** impact in the plan area…" – *my comment is that this can be mitigated by decreasing the proposed GPU density. Less density would generate less traffic trips. Again, the proposed GPU density is too intense and dense for the fixed infrastructure of our City which is ranked the 4th densest in the US. Re-analyze this section with less overall density of the 5 zones and incorporate the post-Corona Virus facts for living and commuting methodology to this GPU….this should help with creating a less than significant finding.*
31. Page 5.13-7 Regional Housing Needs Assessment & Table 5.13-4 City of Santa Ana 2014-2021 Regional Housing Needs Assessment – *my comment has to do with how the "carryover" of 201 lower-income units are divided into "very low" and "low" categories. How is this decided? Please advise. Also, since it appears that the City will be able to achieve the build out of the remaining 204 units for the planning period 2014-2021 and then some, I'm not sure what this information is trying to portray? It would be best to understand the next 7-year period requirement as it relates to the GPU proposed density. My limited knowledge is that our next 7-year requirement is a lot less than then GPU density proposed. Please explain why this information is not included and analyzed in this GPU?*
32. Page 5.13-13 Jobs-Housing Ratio & Table 5.13-9 Comparison of Orange County COG 2045 and GPU Buildout Projections - *this information is interesting but it does not factor in the current existing jobs-housing info vs. proposed GPU jobs-housing info (should compare apples to apples). Instead it looks at OC COG 2045 projection and compares that to the GPU buildout. Since the OC COG 2045 is just a projection, its not a very valid analysis. I believe it would be more meaningful to compare the existing jobs-housing ratio for Santa Ana to the proposed GPU jobs-housing ratio. Please redraft and reanalyze to include this information.*
33. Page 5.13-14 Table 5.13-10 Existing and Proposed Land Use Designations – *again, proposed GPU density and intensity increase is unsustainable for the City's fixed and antiquated infrastructure. The City of Santa Ana is rank 4th*

densest in the US. Also, this table is incorrect. The zone for 55 Fwy/Dyer Road shows 0 existing residential acreage and then 0 for GPU residential….however, the GPU land use map shows a change for some of this zone to District Center which includes a high-density residential component. So, in fact the category for GPU Residential Acreage for 55 Fwy/Dyer Rd is not zero and should be accurately calculated. Also, the increase should be noted in the last column [titled: Increase (Acres)] as its not "0". Please redraft and update accordingly and recirculate.

34. Page 5.13-15 5.13.6 Mitigation Measures Impact 5.13-1 – *again, I'm not sure this comparison is sufficient (see comment #32). Also, why would the GPU propose a population growth (and therefore corresponding density) 20% greater than the OC COG's 2045 projections? Reduce the density for the GPU so that it is more inline with the OC COG's 2045 projections….this City is already too dense and the infrastructure cannot sustain this type of density increase the GPU proposes!*
35. Page 5.13-15 5.13.7 Level of Significance and After Mitigation Impacts 5.13-1 "Impacts would be significant and unavoidable at full buildout" – *well, this is simple, reduce the proposed density of the GPU until its less than significant. This entire section needs to be redrafted and reanalyzed with less density along with the post-Corona Virus methodology of how we live now….work from home, reduced commuting, repurpose and adaptive reuse of vacant existing office buildings. Please provide a more updated analysis based on this information.*
36. Page 5.14.28 Impact 5.14-2: The GPU would introduce new structures, residents and workers into the Santa Ana Police Department Service Boundaries, thereby increasing the requirement for police protection facilities and personnel – *According to the City Council, our Police Dept is under staffed based on the population of the City. The proposed GPU density increase (stated in the GPU as 36,261 housing units) will require additional Police Officers. Does the City have the ability to financially support this increase in Police based on the GPU density increase? It appears that this is not adequately analyzed in this document. Also, based on the current social unrest of protestors, riots and general mayhem, we need all the Police Officers that the City can currently support….more GPU density will only exacerbate this.*
    I also believe that the City has a formula for how many Police Officers are needed for the generation of new residential projects based on the approximate occupancy rate based on the proposed density (GPU says 36,261 housing units but only 22,361 additional residents….this number definitely appears to be low and in no way corresponds to 32,261 housing units?) Therefore it would be more meaningful to do a redraft that would include this analysis (actual number for the population based on the 36,261 housing units) along with the cost of the Police Officers based on the proposed GPU density increase. Once that is formulated, this information would provide more worthwhile analysis and financial information. Please research, reanalyze and redraft this section regarding Police Service.
37. Page 5.14-41 Impact 5.14-3: The GPU would generate additional students who would impact the school enrollment capacities of the Santa Ana Unified School District, Garden Grove Unified School District and Orange Unified School District – Table 5.14-13 GPU Updated Buildout Student Generation – *my comment is*

that based on the information, an additional Intermediate School appears to be needed. Also, some of the zones in the GPU which are being proposed as residential development (and were previously industrial, commercial and office uses) don't have schools in close proximity. This was not addressed adequately in this Program EIR. I would like to see further research and analysis regarding this information in order for it to be truly meaningful and more of a worthwhile analysis.

38. Page 5.14-46 Impact 5.14-4: The GPU would allow for up to 22,361 additional residents in the GPU plan area increasing the service needs for the Main Library and the Newhope Library Learning Center – *my comment is that since the City is under served by Library locations, it should be part of the GPU to designate several annex locations, especially since the proposed density of the GPU is so large. Ideally, one of those annex locations should be in the Grand Ave/17th St zone, especially since there should be a Specific Plan for this area between the 22 Fwy & 5 Fwy or at a minimum, the Medical Arts property and adjacent shopping center properties at the NWC of 17th St/Grand Ave. There should probably be another annex location in the southern section of the City, perhaps the South Bristol zone would also be ideal. Given that you are in the process of drafting this GPU and Program EIR, it seems shortsighted that you wouldn't designate which zones Library Annexes should be located in. Please revised this document to include this information.*
39. Page 5.15-5 Parks and Open Space by Focus Area – Grand Ave/17th St….this section states: "…There are parcels designated as open space in this focus area, however, there are no parks in this focus area." – *my comments are as follows….first this "open space" that is shown on the Land Use Map for this zone is actually the Railroad ROW which contains 2 railroad tracks, a decorative fence and some landscaping plants. It is in no way "useable" open space. It should be redesignated as Railroad ROW….this is just plain deceptive. The second part of my comment has to do with the statement that no parks are in this zone. I would like to recommend that for all 5 zones you apply the actual overall acreage for parks to be developed based on the residential density requirements for park space plus the requirements for all other land uses and combine along with an appropriation of the existing park lands deficit to come up with a per zone park acreage number. Calling this out at the beginning is the only way to plan for and build the parks. If you don't do it this way, the requirement park space will never be located and built, and the park land deficit will continue to grow. <u>This is an excellent opportunity to fix the overall lack of parks in our City.</u>*
    In the case of the 17th St/Grand Ave zone, I would recommend that as part of the Specific Plan for the Medical Arts property and adjacent Shopping Center at the NWC of 17th/Grand Ave, a park component be calculated and included in the Specific Plan based on the same methodology as above. If the Specific Plan encompasses all the of the zone property between the 22 Fwy and 5 Fwy, then all those additional properties will make the same contribution based on their land use designation. Ideally, the Specific Plan could be planned to have a centralize park feature in the center of the Medical Arts & adjacent Shopping Center properties, it could be called "Grand Park" with lush grass and shade trees, walking/biking trails, gardens, fountains, a real focal point for this overall development. You could have most of the commercial/office/medical/retail along

Grand Ave and 17th street where you have lots of visual frontage and then the next layer of residential.....Medium Density, Condos/Town Homes and SFR making rings around the park and then a splattering of unique retail along the park perimeter.....such as cafes for dinning and other supportive retail for the park. It's a vison for a better City, which could use a bit more imaginative thinking for the planning of the future (and incorporated into the GPU) along with shoring up the park land deficit in the City. Please incorporate this kind of thinking in your reanalysis of creating and implementing actual park acreage for all 5 zones in the GPU.

40. Page 5.15-10 Table 5.15-3 Existing vs Required Parkland Acreage – *this table shows that currently, the City of Santa Ana is* ***short about 108 park acres*** *throughout the City. That's before the GPU density numbers are factored in! I would like to know what the actual total park acreage is after you analyze what additional park acreage is generated based on the proposed density and land uses of the GPU and add that to the 108 park acre deficit. Please research and analyze this and revise the document accordingly. This information is very important in how each zone is going to be able to provide the necessary park acreage going forward. Because the City is operating at a .32 acre shortage per 1,000 residents, its important to rectify this in the GPU and make sure the zones provide the require amount of 2.0 acres per every 1,000 residents and include additional park acreage to fix the 108 acre deficit as well, which is doable given that all 5 zones are spread out throughout the entire city and not just concentrated in one area. Thus, these zones should be able to serve all of Santa Ana proper with an even disbursement of additional park acreage. Please revise based on this information.*

41. Page 5.15-12 Land Use Element Policy 1.3 Equitable Distribution of Open Space – *my comment is that the City Planning Department needs to adhere to Goal 1 Policy 1.3! Therefore, this document should include on a separate exhibit that has a calculation of the exact acreage for each zone for park acreage plus the existing deficit of the 108 acres shared accordingly for each of the 5 zones. Please provide this information.*

42. Page 5.15-12 Land Use Element Goal 1; Policy 1.9 Public Facilities and Infrastructure – *this document needs to ensure that based on the 5 zones these proposed land use designations need to "ensure that they do not compound existing public facility and service deficiencies." Please provide research and analysis on this and incorporate in the GPU so that its verified that these zones are able to meet Goal 1 Policy 1.9. This will make the GPU a better document.*

43. Page 5.15-13 Land Use Element Goal 4; Policy 4.9 – *my comment here is that you need to ensure that you adhere to "encourage public and commercial recreational facilities in areas that are park and open space deficient." Particularly with the Grand Ave/17th St zone where I envision a Specific Plan that ideally encompasses the "Grand Park" component. Also, this Policy should be included in all of the other Focus Areas as well. I would like to see research and analysis that supports Goal 4; Policy 4.9. Please redraft and recirculate with the updated information.*

44. Page 5.15-13 Open Space Element Goal 1; Policy 1.3 Park Standard – *my comment here is that all 5 zones of the GPU should adhere to this Policy which is "achieve a minimum park standard of two (2) acres per 1,000 residents in the*

City." This should be analyzed in the GPU for all the zones. The calculations should be incorporated into the GPU land use map and key so that its noticed what the requirements are and thus achieved instead of operating in a 108 acre deficit! Please update accordingly and recirculate for an additional 45-day public review.

45. Page 5.15-14 Open Space Element Goal 2; Policy 2.2 Neighborhood Engagement, Policy 2.4 Urban Forest, Policy 2.6 Facility Maintenance - *my comment is that all of these Policies should be included in the 5 zones for the GPU and show how these Policies are being accomplished for each of the zones. Please incorporate in this document with the specifics and recirculate the Program EIR for an additional 45-day public review.*
46. Page 5.15-15 Goal 4 Create nodes and urban hubs throughout the City to foster community, education, arts and culture, business activities, entertainment and establish Santa Ana s a vibrant center – Policy 4.3 and Policy 4.5 – *my comment is that Goal 4 and Policies 4.3 and 4.5 need to be incorporated into the GPU and show how they will be implemented in each of the zones. Specifically as it relates to the properties of the Medical Arts and adjacent Shopping Center at the NWC of 17th St/Grand Ave so that in the future Specific Plan for this area, it addresses the Grand Park and linkage components in order to achieve Goal 4 and Policies 4.3 & 4.5. It should also be addressed in the other 4 zones. Please revise the GPU to address this Goal and Policies. Please research and include this information and recirculate the document*.
47. Page 5.15-16 Table 5.15-4 Existing and Proposed Parkland – *my comment about this Table is that it shows how the City of Santa Ana is under parked! In order to overcome this extreme deficit, the GPU needs to incorporate this deficit of parklands in the amount of 108 acres and incorporate it into the 5 zones along with the calculated appropriate park acreage requirement for the GPU zone areas based on the GPU density and land uses. This GPU should factor in the old and the new and implement an accurate Park Land acreage for the City of Santa Ana. This needs to be factored into the document, researched and analyzed so that there no longer is a deficit and the new GPU incorporates this much needed park acreage increase. Please update and recirculate.*
48. Page 5.15-17 Paragraph starting with "Furthermore…" This paragraph talks about the Dyer/55 Fwy Focus Area and other growth areas of the City provide additional recreation, parks and core services essential to making complete communities – *my comments are that there are 2 major projects: the Heritage/Broadstone/Arden (approx. 1400 units) and the Bowery at 1100 units and no park space was include in the Bowery and only 1 acre was included in the Heritage/Broadstone/Arden with 1,400 units?! This does not satisfy the General Plan requirement at all. Why would the City's Planning Department allow this to slip? It just shows that the Planning Dept is not looking out for the citizens of Santa Ana and have even contributed to the increase of the park lands deficit of the City! This is unacceptable and the people in charge should be fired for not following the General Plan policy!!! Now, this zone needs to make up for the deficit which the Planning Department created when they approved these projects in the 55 Fwy/Dyer Rd zone. Going forward the deficit parklands need to be appropriated in this area to make up for the deficit from the Heritage/Broadstone/Arden and the Bowery. Also, the City now needs to*

incorporate proportionately the park acreage shortfall into the other zones and incorporate the mandated park requirement generated by the GPU into this document. Please reanalyze and redraft these requirements and recirculate the Program EIR for an additional 45-day public review period.

49. Page 5.16-24 Impact 5.16-1: The GPU is consistent with adopted programs, plans and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities – *my comment is a general comment as to the existing roadways….the City's roadways are a set factor, and more roadways cannot be added to a City which is built out. However, the GPU proposes to add more density, and even if some of those new residents use public transit, bike or walk, there will still be a vast majority that will travel by car and the current roadway system will be hard pressed to operate smoothly with additional traffic and congestion generated from the additional density. Because the roadways are set, the density increase and traffic generated will add to the air pollution from more idling on congested roadways and freeways and this will never be able to be mitigated to a level of less than significant. All the more reason to decrease the proposed GPU density and create more mid-level jobs for our City so its possible for people to actually "live/work" in Santa Ana.*
50. Page 5.16-33 Conclusion – *my comment in this section is regarding the sentence "…implementation of the GPU will increase demand for public transit, bicycle and pedestrian facilities, which will require the improvement and expansion of the circulation system." How can a built-out City with a fixed roadway system provide "expansion of the circulations system"? Please explain how this is to be achieved.*
51. Page 5.16-34 Impact 5.16-2: GPU implementation would result in a reduction of vehicle miles travels per service population (VMT/SP) in comparison to existing City conditions and would achieve a VMT/SP at least 15 percent lower than the countywide VMT/SP – *not sure how this can happen? The only way this would be a true statement is that all the additional density proposed by the GPU and all the additional people that are going to living in the City would not travel in cars. I believe that further analysis and discussion is necessary to understand how you are able to arrive at this conclusion because from a common sense standpoint, it can't happen.*
52. Page 5.16-35 The paragraph below Table 5.16-3 which starts with "Furthermore…" – *my first comment has to do with the sentence "concentrate development along high-quality transit corridors." First, I believe that it would be beneficial to better understand the meaning of "high-quality transit corridors" and how they are used and how this will be implemented in the GPU zones. My second comment is in this same paragraph where it states "nonmotorized transportation as alternatives to augmenting roadway capacity." Please provide more specific examples of "nonmotorized transportation" so that this statement can be more understandable and does actually provide a realistic alternative in augmenting roadway capacity as well as demonstrating how this would be implemented in the GPU zones. Please update accordingly.*
53. Page 5.18-7 Table 5.18-2 Existing Average Daily Sewer Flows – *my comment is a general comment which I believe needs to be further expanded on and better explained in this section….in general, non-residential uses generate less sewer need and capacity compared to residential uses. So, by adding more residential*

land uses as proposed by the GPU, especially where non-residential uses currently exist, there will be a net increase for sewer capacity. This needs to be further evaluated and documented in the Program EIR, please revise accordingly.

54. Page 5.18-13 Table 5.18-3 Average Sewer Flows – GPU Buildout – *my comment is specific to the Focus Area of Grand Ave/17th St showing a change of sewer flow by 140% for this area or an additional 262,947/gpd. This increase in sewer capacity is a concern for an infrastructure that is older. Also, this Table shows that overall, GPU will provide and net increase of sewer flow of 3,091,195/gpd! Also, there are 2 zones (S. Bristol St. & 55 Fwy/Dyer Rd) which have an exorbitant increase of sewer flow due to the GPU of 1,132,067/gpd (existing is 125,918/gpd) and 1,581,821/gpd (existing 538,450/gpd) respectively. This is concerning given the antiquated infrastructure in our City. Please provide information regarding the actual durability of the sewer system to handle this increase.*
55. Page 5.18-15 Bullet Point Grand Ave/17th St Focus Area – *my comment has to do with the statement "…will not exacerbate existing adjacent upstream capacity issues within the 15" and 18" trunk lines." I would like to see more technical data that supports this statement. These sewer lines are older and that should be a concern with the increase of capacity due to the GPU which could cause potential strain on old sewer lines and significant damage. Please provide more information as to the condition of the durability of these sewer lines.*
56. Page 5.18-25 Table 5.18-6 Existing Average Daily Water Flows – *my comment is a general comment that has to do with water usage. In general, Residential uses have a higher demand of water usage compared to Non-residential uses. So the GPU proposed increase of residential and the decrease on non-residential uses with generate a higher demand for water usage. I think this information should be included in this section for a baseline. Also, there is a typo in your Table…the far right column should stated "water flows" instead it reads "sewer flows".*
57. Page 5.18-36 Table 5.18-12 Average Water Demand – Existing Compared to GPU – *my comment is that 2 of the 5 Focus Areas of the GPU are creating major changes in water demands….the S. Bristol St zone has a demand increase of 1,198,226/gpd or an 857% increase! And the 55 Fwy/Dyer Rd zone has a demand increase of 1,660,558/gpd or an 666% increase! These are huge increases. Overall the GPU will generate an increase of water demand by 3,244,498/gpd…this seems too excessive and would be best to revise the GPU so that the residential density increase proposed is a much more reasonable increase so that there is not such a huge increase in demand for water especially since the water lines of the City are older which is a cause for concern. Please update accordingly.*
58. Page 5.18-37 First paragraph starting with "Full GPU….." – *my comment is in this paragraph it states that the water increase is "representing approximately 75% of the projected city-wide increase in water demand"…this again is huge! Therefore, the GPU proposed density should be reduced to a more manageable level as it relates to water demand. (Water supply is always a concern here in CA). Please update accordingly.*

59. Page 5.18-37 Water Distribution System – *my comment is directed at the 4 bullet points discussing water main replacement projects…it would probably be ideal to have these replacement projects underway prior to redevelopment and building of these 4 Focus Areas so that there isn't a strain on the system by allowing close to the buildout of these Focus Areas before replacing these water mains. I would recommend creating a schedule and requirement that before a certain number of units in the Focus Areas are built, the replacement projects are in place. I would like to see a schedule and cost estimate for these replacement projects included in the GPU. Please research and revise accordingly.*
60. Page 5.18-37 Table 5.18-13 Water Flow changes, Current General Plan to Proposed GPU – *my comment is that you have a typo in the far right column…it should be "Change in Water Flows" not "Sewer".*
61. Page 5.18-39 Table 5.18-15 Water Demand – Existing compared to GPU – *my comment here has to do with the increase of 36,851 Multi-family units as proposed by the GPU….this is a major increase which equates to a water demand of 6,761/AFY. A reduction in the proposed increase number of Multi-family units for the GPU should be considered so the demand for water can be better managed by the City for our future water needs. Please look at adding new residential units, just not at the density you've drafted in the GPU.*
62. Page 5.18-47 Safety Element Policy 1.7 Surface Water Infiltration – *my comment pertains to the section in this Policy that says "Encourage site drainage features that reduce impermeable surface areas…" In order to achieve this Policy of the reduction of impermeable surface areas, there needs to be included in the land use planning of the 5 Focus Areas, designated park and open space acreage in order to create more permeable surfaces to capture ground water and to lessen the burden on the City's older storm drain systems. Please incorporate this into the Land Use Element in order to fulfill this Policy.*
63. Page 5.18-52 Forecast Solid Waste Generation by General Plan Buildout – *my comment has to do with the statement "…The net increase in estimated solid waste generation compared to existing conditions is approximately 401,408 pounds per day." This is a big amount of solid waste being generated per day due to the GPU increase of residential density and decrease of commercial, office and industrial uses. Based on this information, it would be best for the City and the planet if we lessen the GPU residential increase to a level that is much more manageable for our City and our landfills…this would provide a reasonable balance. Please revise accordingly.*
64. Page 5.18-63 Impact 5.18-7: Development pursuant to the GPU would require or result in the relocation or construction of new or expanded electric power and natural gas – *my comment here is that the net increase for Electricity Demand based on the current existing vs the GPU buildout is an increase of 260,755,497 kWh per year! The net increase for Natural Gas Demand based on the current existing vs the GPU buildout is an increase of 119,734,406 therms per year! In light of these huge demands on energy, it would be best for the City and the planet if we lessen the GPU residential increase to a level that is much more manageable for our City, the power grid and the harvesting of natural gas…this would provide a reasonable balance. Please revise accordingly.*
65. Page 6-1 Air Quality Impact 5.2-1 Inconsistency with Air Quality Management Plan – *my comment is whether there is an scenario of reduced construction*

and/or scheduling that would satisfy SCAQMD (AQMP) threshold? When was the last time the AQMP was updated? What type of projections did they make? Is the GPU proposing too much density and intensity that is not supported by the AQMP projections? Just saying that the impact remains significant and unavoidable unless the AQMP includes an update that incorporates the GUP is an unreasonable request. Please provide more information and analysis.

66. Page 6-1 Air Quality Impact 5.2-3 Long-term Emissions – *my comment is that it states here that the buildout of the GPU would generate long-term emissions that exceed South Coast AQMD's regional significant thresholds…..at what decrease of the proposed density of the GPU would there be less than significant impacts? In order to decrease the emissions, I believe that the City needs to look at what revisions need to be made to the GPU to achieve a level that is within the SC AQMD threshold. Please provide more research and analysis on this subject.*
67. Page 6-2 Air Quality Impact 5.2-4 Exposure of Sensitive Receptors to Toxic Air Contaminants & Impact 5.2-5 Exceeding Localized Significance Thresholds – *my comment here has to do with what reductions to the GPU density and intensity needs to occur in order to make Toxic Air Contaminants health risks less than significant? Is this achievable in any way? Please advise.*
68. Page 6-2 Cultural Resources Impact 5.4-1 Historic Resources – *my comment is that the City needs to look at how to avoid impacts to Historic Resources so that we can create a balance in preserving the City's history in hand with new infill development. A harvesting of historic items should be done for all projects and placed in the City's museum, if applicable. All attempts to preserve historic architecture need to be supervised by the Historic Resource Committee so that all involved are working together to preserve all that can be preserved of the City's history in order to achieve a balance during the redevelopment process.*
69. Page 6-3 Greenhouse Gas Emissions Impact 5.7-1 Greenhouse Gas Emissions – *my comment here is that if you change to meeting a 2030/2040 goal as well as reducing the proposed density and intensity of the GPU, would this then reduce the impact to a less than significant level? I believe that at this time, the 2050 goal my be unrealistic in projecting out this far as so many things can change just like what has happened with Corona Virus and more people working from home and therefore less commuters on the road creating Greenhouse Gas Emissions. Please advise.*
70. Page 6-3 Noise Impact 5.12-1 Traffic Noise – *my general comment here is that if you reduce the proposed density and intensity of the GPU, then there will be a corresponding decrease in trip traffic….would this help in achieving a less than significant level?*
71. Page 6-4 Population and Housing Impact 5.13-1 Population and Housing Growth – *my comment is if the GPU proposed density and intensity were reduced to create a population increase that meets the 2045 OC COG projections, at what proposed density increase would it be a less than significant level? I believe that this should be researched and analyzed.*
72. Page 7-2 7.1.2 Project Objectives Item #2 Optimize high density residential and mixed use development that maximizes potential use of mass transit – *my comment here is again, not sure this old style of thinking is necessary as we once thought due to the living adjustments post-Corona Virus. There is more desire to live in SFR as opposed to high density, especially while sheltering at*

home, more people working from home, less people commuting to work, more risks in taking public transportation due to the Corona Virus, more vacant office space because companies have their employees working from home, likely less office space needed for companies since they can save costs on leasing office space with employees working from home. This then creates a repurposing and adaptive reuse for the vacant office buildings potentially lessening the need for a density increase and new construction. Need to factor in the rethinking and methodology of the new way of living and working post-Corona Virus.

73. Item #4 Facilitate new development at intensities sufficient to generate community benefits and attract economic activity – *my comment has to do with fully understanding what exactly this means by "intensities sufficient to generate community benefits…". Providing some examples would be helpful to better understand the intent of this sentence. I'm all for generating "economic activity" but unsure how this is achieved by way of this sentence. The economic activity that should be generated is the recruiting of mid-level jobs to our City.*
74. Item #5 Provide housing and employment opportunities at an urban level of intensity at the City's edge – *again, I'm not sure exactly what this sentence means or what it is trying to accomplish. Why do we want this at the City's edge? Not all housing has to be at an urban level…..not everyone wants to live in a high density high rise. A variety of residential is always best…..balance is good. This GUP is definitely unbalanced on so many levels especially between the high density uses and lack of generating jobs. For example, why not try to recruit a Costco for the 17th St/Grand Ave zone? That would be worthwhile. Just adding high density housing makes our City much more undesirable since we are already the 4th densest City in the US.*
75. Item #6 Introduce mixed-use urban villages and encourage experiential commercial uses that are more walkable, bike-friendly and transit-oriented – *my comment again here is what exactly is "experiential commercial uses"? What are some examples? This sentence may sound good but is it actually achievable? In order to be successful, people have to want to live in an "urban village" first. Also, the commercial uses need to serve the urban resident on a variety of levels and it takes the right product mix to achieve a desirable affect so people want to be there and enjoy the experience. DTSA has started to do this and it has the building foundation (literally!) to actually pull it off in my opinion. Creating a new "urban village" from scratch is a bit harder for a City like Santa Ana and the income level of a majority of the population here is lower compared to other cities in Orange County.*
76. 7.2.1 Alternative Circulation Element – Roadway Classifications – *my first comment has to do with the first paragraph and the statement "…a reduction in the number of existing or planned travel lanes." The reduction of existing travel lanes or planned travel lanes should not at all be considered. Here in Southern California we still embrace the car culture and as hard as the State and City try to break us from this, it likely will not happen so making everyone miserable by reducing lanes is just insane! My second comment is to the next paragraph which states "…potential to reduce VMT (by reducing the number travel lanes for some roadways)…" – again, not sure why reducing travel lanes for some roadways is even being discussed and how you can calculate a reduction of VTM when the GPU alternative increases both the residential density uses and*

population….this is not sensible thinking. Please reanalyze and revise based on this comment.

77. Page 7-6 7.2.2 Reduced Traffic Noise Alternative – *my comment on this section is whether there is any planning scenario that would mitigate traffic noise to a less than significant level? I would like to know if there is as to whether this is even achievable…please advise.*
78. Page 7-9 7.3 Alternatives Selected For Further Analysis – bullet point Reduced Intensity Alternative – *my comment here is by creating a reduced density and intensity alternative, is it possible for Air Quality, GHG Emissions, Noise and Population & Housing impacts to be reduced to a level of less than significant? It would be interesting to find out how this could be achievable. I would like to see some analysis for this as I believe overall, it would be very helpful in creating an Alternative that would be less dense and therefore, less impacting.*
79. Page 7-10 bullet point 2020 RTP/SCS Consistency Alternative – *my comment regarding this alternative is if you revise the GPU to mirror the Connect So Cal and RTP/SCS projections, would this alternative create a less that significant impacts for Air Quality, GHG Emissions, Population & Housing and Noise? It would be interesting to know what this alternative looks like.*
80. Page 7-12 7.3.1 Alternative Comparison Table 7-3 Project Alternatives – Socioeconomic Comparison – *this is a very interesting table….I would like to see a blended alternative prepared which melds the best of the "Reduced Intensity Alternative" and the best of the "2020 RTP Population/Housing Consistency Alternative". I believe that this combined alternative may be the* ***win/win/win scenario*** *for the City, its citizens and future generations. I would highly recommend that the Planning Department create this alternative and provide the same level of analysis and make this the GPU "preferred" project for the Program EIR.*

Based on the above comments, I would suggest the following recommendations:

A. Prepare a "preferred" project that is a blend of the "Reduced Intensity Alternative" and the "2020 TRP Population/Housing Consistency Alternative". This would 1) create a less dense and intense GPU Preferred Project compared to the current GPU August 2020 project as presented in the Program EIR, 2) still achieve the goals of the Planning Department and 3) would likely be better embraced by the Community.

B. Redraft and reanalyze this GPU Program EIR so that it factors in the rethinking and methodology of the post-Corona Virus adapted way we now live, work and commute today and in the future.

C. Include a park acreage component for the City's deficit amount of park lands plus what each Focus Area will require based on the land uses and density in each zone. Add this acreage total to the land use maps and keys for each of the Focus Areas as well as in the GPU narrative for each of the Focus Areas in order to incorporate, through the planning process and actually construct, the much needed park land throughout the City.

D. As good stewards of the City of Santa Ana and following best planning practices, strive to create a good balance of uses and benefits for the City and its citizens, now and in the future.

E. Revise the Program EIR based on a new “preferred” project as well as incorporating the other comment items mentioned and recirculate for an additional 45-day public review.

Thank you for the opportunity to provide comments to this GPU Program EIR and thank you for your commitment to make the City a better place for the future.

Respectfully Submitted,

Diane Fradkin
Diane Fradkin
28-year Santa Ana Resident