



November 4, 2020

Via Email

Planning Commissioners
ecomments@santa-ana.org
City of Santa Ana
20 Civic Center Plaza
Santa Ana, CA 92701

Re: City of Santa Ana, General Plan Update – Comments

Esteemed Commissioners,

I write you on behalf of our partnership which owns 1212 E. 4th Street, a vacant property in Santa Ana that we hope to develop someday soon.

My personal background is Planning and Development including a fair amount of entitlement work in many jurisdictions throughout Southern California. I currently offer Development Services to my clients through IMG Construction Management, including acquisition due diligence, underwriting, cost estimates, etc. I was also the chair of the Urban Land Institute (ULI) Technical Assistance Panel (TAP) program for many years.

In short, I hope that I can offer my experience, unique perspective, and be helpful as you aim to update the General Plan, a significant undertaking. Below are my comments and questions for your consideration.

Conflicts with Disposition of Properties and Surplus Land Act

The City is in the process of disposing of several properties, including the one next to ours at the corner of 4th and Grand. It is referred to as the “C7” property. Our partnership has been in a holding pattern, waiting for the City process to unfold so that we may finally offer to purchase it. Please note that there are several other properties to our south that are also going through the surplus lands act process.

The proposed General Plan update reduces the intensity of both our property and those that are being processed through the Surplus Land Act for disposition. The City has had a lengthy and somewhat painful history with the disposition of those properties. It has been ongoing for many years. Reducing the density and FAR now will only further complicate things and reduce their sale value for the City.

Mobility Element

Widening

In Figure M-1, 4th Street along our frontage is proposed to be designated as a Divided Collector (Green), with a typically ROW of 84' and 64' curb to curb.



Unfortunately, the existing ROW is only 80' and ~55' from curb to curb. I support the creation of pedestrian opportunity zones including wider sidewalks, bike lanes, more landscape opportunities in the parkway, etc. but widening is not advisable. Here is why:

- 4th street is a constrained built environment, and it is highly unlikely that all of the properties will redevelop, dedicate right of way and provide the necessary width that this element envisions.
- The widening seems to afford a raised median which represents maintenance cost for the City.
- SB743 (aka the Vehicle Miles Traveled bill) and modern good planning principals discourage more pavement.
- Lastly, the Transit Zoning Code includes minimum lot depths which will be compromised by widening.

I highly discourage widening. It will only burden small infill projects, which the city should encourage. Widening is costly but offers minimal benefit.

Bike Lanes

Figure M-2 implies that only the north side of the street is planned for a Class III Bike Route / Boulevard but if sharrows are proposed, which don't require widening, then it seems that the bike lanes should be on both sides of the street (east and west). Please clarify.

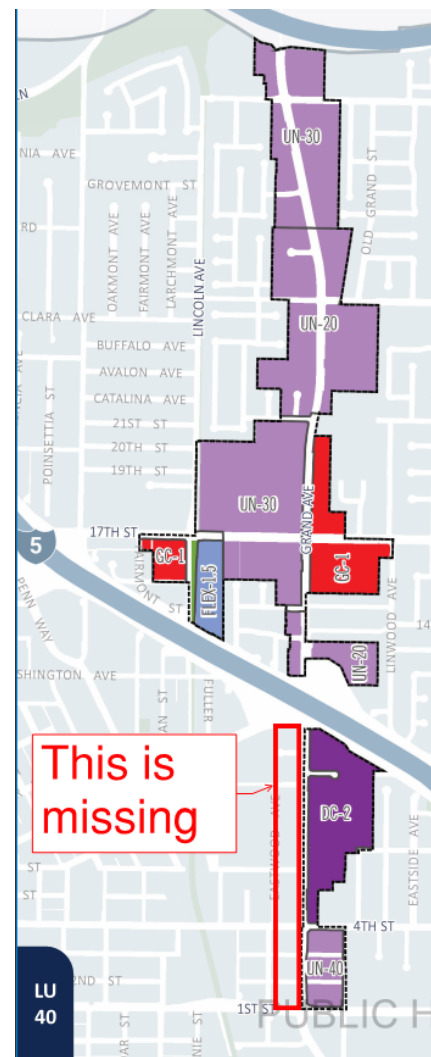
Land Use Element

A significant portion of Focus Area 2 – Grand and 17th, relates to a soon to be proposed redevelopment of the old Church site which is the east side of Grand (DC-2 Area) but this falls short of recognizing the larger opportunity to develop both sides of Grand in a cohesive way. Again, the City is in the process of selling its properties (west side of Grand), so why not set forth a plan for this major street that provides for a cohesive look and feel. I recommend that the land use designations proposed for the east of Grand match the west side of Grand. In addition, this will add value to the city properties.

Page 14 of the Land Use Element speaks to measuring Residential Density and NonResidential Intensity (FAR) but does not provide clarity for mixed use projects. Table LA-3 indicates maximums as FAR OR Density. Page 23 under UN-20 also shows "OR". It is not clear if one standard "OR" the other should apply.

I support the approach with footnote 2. Many of these properties which are proposed to be updated are also contained within the Transit Zoning Code (TZC) which has very detailed development standards. Putting more development standards into the General Plan only creates conflicts and inconsistencies and also reduces the ability to use concessions or waivers that otherwise encourage development.

The TZC allows for a maximum of 40 DU/AC for our property (assuming Flex Block) but the proposed General Plan update would reduce that to 20 DU /AC via the UN-20 designation. It is incredibly



Unison Real Estate Group, LLC



challenging to redevelop small infill sites. Downzoning our property and others like it will only hamper our ability to invest in Santa Ana.

Thank you once again for your consideration in these matters.

Sincerely,

Oscar Uranga, PMP
On Behalf of Unison Real Estate Group, LLC

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