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November 9, 2020

Chairman McLoughlin and Planning Commissioners

City of Santa Ana

Santa Ana CA 92702

**Subject: COMMENTS ON GENERAL PLAN UPDATE**

I would like to start off by thanking the City for identifying environmental justice policies/implementation actions in the eleven elements being updated. It helps. Along that line it would have been helpful if change bars were included in the new drafts of the General Plan Update, dated October 29, 2020. Lacking those change bars requires the public, and the Planning Commission to read the entire document once again and, leaving the ready to guess as to what changed. This is not an effective way to review. The public and the Planning Commission should not be left in the dark as to what needs to be addressed when looking for any changes that were made to the newest version as compared to what was used for the Program Environmental Impact Report (PEIR).

In addition, a small sampling of these changes revealed that errors now exist between the Final PEIR and the General Plan Update. For me personally, I don't know which document to believe. This must be corrected so the Planning Commission, the public and eventually the City Council understand what is correct. **Example:**

Language in Draft Open Space Element PUBLIC HEARING DRAFT, OCTOBER 29, 2020

**OS-1.8 Development fees. Development fees.**

*Consider updating the City's Acquisition and Development Ordinance to better reflect current costs and needs by increasing the parkland dedication requirement, and require that fees collected in place of parkland dedication for specific development projects be utilized to acquire, expand, or improve facilities within the same quadrant or geographic subarea (as defined in the Parks Master Plan) as the project for which the fee was collected.*

Language in Volume 1\_FEIR

**OS-1.8 Development fees.**

*Conduct a nexus study and update the City's Acquisition and Development Ordinance every periodically to require new development projects to pay fair share to cover the cost of parkland acquisition and improvement if the project is unable to provide adequate parkland within the project. Require that fees collected in place of parkland dedication for specific development projects be utilized to acquire, expand, or improve facilities within the same quadrant or geographic sub-area to be defined in the Parks Master Plan as the project for which the fee was collected. [Agency: Planning and Building Agency (PBA)/Parks, Recreation and Community Services Agency (PRCSA); Timeline: 2022]*

**Does the PEIR need to be updated to address the new General Plan Update or visa-versa?**

Furthermore, having implementation actions that say “consider” or “evaluate” are weak actions that do not hold the City accountable. One can “consider it” and do nothing, therefore the objective could be met without performing any concrete action.

From the Cities website<sup>1</sup>:

*“Santa Ana’s “Golden City Beyond: A Shared Vision” General Plan will guide the City’s development and conservation for the next 25 years through 2045. The update will provide long-term policy direction and communicate the vision, values, and goals for Santa Ana’s physical development, fiscal and environmental sustainability, and overall quality of life.”*

Keep this thought in mind, I’ll get back to it.

### **General Plan Update Program Environmental Impact Report PEIR**

General Plan Update PEIR Sections 5 and Section 6 [pages 5.13-15 and 6-4], states:

*“Full buildout of the GPU would result in a population of 431,629 and the City’s 2045 population growth would be approximately 20 percent greater than the Orange County COG’s 2045 projections. Furthermore, the City’s housing units at buildout would be 115,053, which exceeds the Orange County COG’s projection by 38 percent. There are no feasible mitigation measures to mitigate the population and housing growth at buildout, and impacts would be **significant and unavoidable**.”*

What is not said is this impact could be made **avoidable**. What further compounds this **“significant and unavoidable”** impact is the omission of open space to accommodate the increase of almost 100,000 residents. The current general plan and the proposed General Plan both reference the need for open space at a ratio of two (2) acres per 1,000 residents (a ratio that currently is only half met). This means we should see a growth in parkland space of approximately 200 acres.

The addition of almost 100,000 residents with zero additional parkland space, and ignoring issues related to quality of life is not acceptable. The final PEIR dances around this by saying:

*“For new residential development in Focus Areas, **prioritize the creation and dedication of new public parkland over the collection of impact fees**.” [bold for emphasis]<sup>2</sup>*

**Prioritize** is not **ensure**. For a city that is 98% built out, this does not work well when most available land is being used for development.

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<sup>1</sup> <https://www.santa-ana.org/draft-general-plan-meeting-08-24-2020>

<sup>2</sup> General Plan Update Final Program EIR, Open Space Element Policy, page 23 of 514.

Furthermore, open space land use should not be confused with areas added by developers that they identify as “open space” within their developments. This fallacy must be rejected and clearly stated in the General Plan.

**OPEN SPACE ELEMENT INTRODUCTION:** “Open space is so important that its presence (or absence) can profoundly shape physical, social, mental, and economic health and well-being of our communities.” **So why do we brush this aside?**

Developers idea of opens space is nothing more than common areas added to a development that is not available to the general public. **Onsite open space is not parkland.** Recent project approvals have added **“residential onsite open space”** or as the project before you tonight...**“publicly accessible open space.”** This is nothing more than fitness trails & plazas (sidewalks within the development), fire lanes, courtyards, private decks and roof terraces. Parkland is meant for all the city’s residents. Again, **“residential onsite open space”** should not be confused open space land use and it should be clearly defined in the General Plan.

**POLICY OS-1.3, PARK STANDARD** states:

*Achieve a minimum park standard of two acres per 1,000 residents in the city.”*

This means we should be planning on adding approximately 200 acres of parkland. The Open Space Element also states: **“space is so important that its presence (or absence) can profoundly shape physical, social, mental, and economic health and well-being of our communities.** (GP OS-02)

**From Volume 2 of the Final EIR page 1684 of 1700:**

*“In coordination with a General Plan Advisory Group, the City identified five areas suited for new growth and development: South Main Street, Grand Avenue/17th Street, West Santa Ana Boulevard, 55 Freeway/Dyer Road, and South Bristol Street. These five areas are located along major travel corridors, the future OC Streetcar line, and/or linked to the Downtown. In general, many areas currently designated for General Commercial and Professional Office are expanding opportunities for residential development through a proposed change to the Urban Neighborhood or District Center General Plan land use designations.”*

**From Volume 2 of the Final EIR page 1686 of 1700:**

Santa Ana General Plan Buildout Methodology dated September 2020:

- MainPlace Specific Plan
  - District Center, up to 90 du/ac, up to 2.1 FAR
    - 2700 N Main, 71 du/ac
    - Magnolia at the Park, 58 du/ac

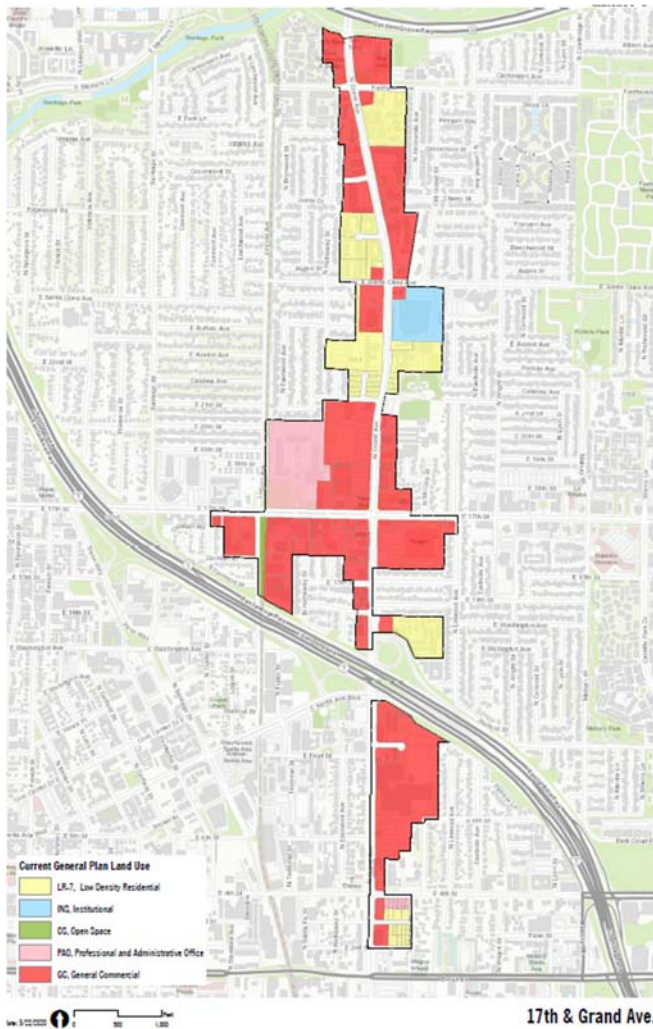
**Why is “Magnolia at the Park, 58 du/ac” even listed? This project is dead.**



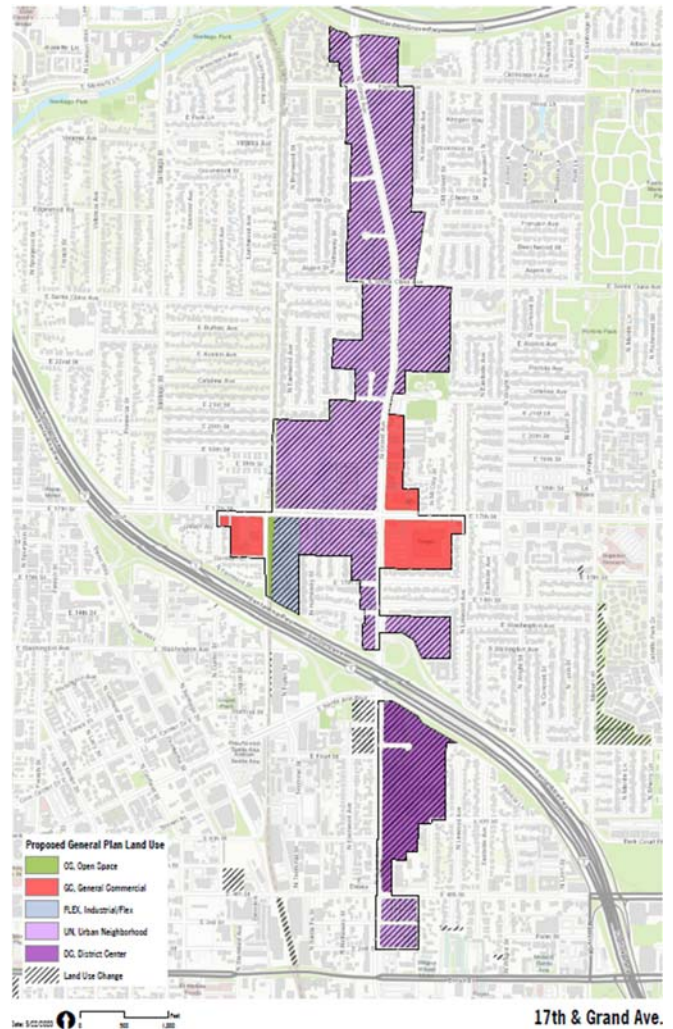
I said I would get back to the *Golden City Beyond: A Shared Vision* and here it is. The five focus areas do nothing but replace **General Commercial** and **Professional / Administrative Office** zoning with District Centers. I think it is safe to say this is one step closer to adding high-density housing to Santa Ana. For a vision of the City it lacks the vision necessary to ensure the City of Santa Ana receives the necessary development **AND** open space the residents of Santa Ana deserve.

**GRAND/17<sup>TH</sup> STREET FOCUS AREA**

**BEFORE:**



**AFTER:**



While I agree Grand Avenue needs some attention the desire by the City to designate the land use to **Urban Neighborhood** or **District Center** is unacceptable. It removes current land use designations that support churches, government offices, schools, single family homes and multi-family homes. I guess it's just easier [for a developer] to change the land use to something that supports high density living. The other Focus areas are in the same situation.





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We are already the densest City in Orange County and second densest city in the state. Let's not exacerbate the problem by adding more high-density areas to the city over the next 25 years

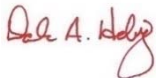
California Rank in Density	National Rank in Population [Density]	Name	State	2019 Population	2010 Census	Change	2019 Density [mi <sup>2</sup> ]	Area (mi <sup>2</sup> )	Latitude/Longitude
	1 [1]	<a href="#">New York</a>	<a href="#">NY</a>	8,601,186	8,175,133	0.25%	29,093	2015	<a href="#">40.66/-73.94</a>
1	14 [2]	<a href="#">San Francisco</a>	<a href="#">CA</a>	897,536	805,235	1.00%	19,520	313.4	<a href="#">37.73/-123.03</a>
	80 [3]	<a href="#">Jersey City</a>	<a href="#">NJ</a>	265,004	247,597	0.11%	18,352	98.42	<a href="#">40.71/-74.06</a>
	175 [4]	<a href="#">Paterson</a>	<a href="#">NJ</a>	146,919	146,199	-0.02%	17,574	56.98	<a href="#">40.91/-74.16</a>
	22 [5]	<a href="#">Boston</a>	<a href="#">MA</a>	694,784	617,594	1.05%	14,627	323.8	<a href="#">42.34/-71.02</a>
	40 [6]	<a href="#">Miami</a>	<a href="#">FL</a>	491,724	399,457	2.65%	13,914	240.9	<a href="#">25.78/-80.21</a>
2	58 [7]	<a href="#">Santa Ana</a>	<a href="#">CA</a>	334,811	324,528	0.06%	12,587	181.3	<a href="#">33.74/-117.88</a>

In summary, the PEIR does not address the ***absence of 200 acres of parkland and the profound impact this will have on the physical, social, mental, and economic health and well-being of Santa Ana.***

As it is written right now the General Plan Update is nothing more than a developer's handbook. It clearly is not a "Shared Vision" for Santa Ana

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

Respectfully,



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Resident, Santa Ana

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