

Community Development Department

November 8, 2021

Melanie McCann, Principal Planner (MMcCann@santa-ana.org)
City of Santa Ana Planning and Building Agency
P.O. Box 1988 (M-20)
Santa Ana, CA 92702



Re: Request for Continuance of November 8, 2021 Santa Ana Planning Commission Item No. 3 – Final Recirculated Program Environmental Impact Report No. 2020-03 and General Plan Amendment No. 2020-06 for the Santa Ana General Plan Update (State Clearinghouse Number 2020029087)

Dear Ms. McCann:

On behalf of the City of Tustin, the purpose of this letter is to formally request a continuance of the Santa Ana Planning Commission hearing on the above referenced matter, currently set for November 8, 2021 at 5:30 p.m. until January 10th or 24th, 2022, to allow the City of Tustin adequate time to review the City of Santa Ana's Response to Comments.

On November 3, 2021, the City of Tustin received notification via email of the City of Santa Ana's Response to Comments. The email also provided notification that the Planning Commission will be considering a recommended action on the Draft General Plan Update and Recirculated PEIR at its regularly scheduled meeting on Monday, November 8, 2021. As summarized in the email correspondence, the City of Santa Ana has indicated that the City of Santa Ana addressed Tustin's comments with the following:

- Refinements to General Plan Policy Framework and new Recreation Mitigation Measure (REC-1) that has been added to the August 2021 General Plan Update Recirculated PEIR.
- In addition, page 2 of the Clarifications to August 2021 General Plan identifies refinements to the Draft Open Space Element.

The City of Tustin's 13-page comment letter, dated September 16, 2021, contained four (4) significant areas of concern and the three (3) business days provided to review the City of Santa Ana's Response to Comments does not provide the City of Tustin adequate time to conduct its due diligence on behalf of Tustin residents.

Given the limited time to review the revised documents, Tustin is only able to provide partial comments as listed below. This shall not preclude the City of Tustin from providing comprehensive comments at a future date.

City of Santa Ana
November 8, 2021
Page 2

- Comment 1: MM REC-01 should be revised as follows (add text in italicized red):

The City shall monitor new residential development within the 55 Freeway/Dyer Road focus area. Development proposals for projects including 100 or more residential units shall be required to prepare a public park utilization study to evaluate the project's potential impacts on existing City of Santa Ana, City of Tustin, and City of Irvine public parks within a one half (1/2) mile radius to the focus area. The evaluation shall include the population increase due to the project and the potential for the new resident population to impact existing and/or future public parks within the radius. Each study shall also consider the cumulative development as in the 55 Freeway/Dyer Road area and the potential for a cumulative impact on existing public parks within the radius. If the park utilization study determines significant impacts, mitigation required such as land dedication, and fair-share contribution to the impacted city(ies) shall be required of the project.

- Comment 2:

While it is recognized that transportation impacts under CEQA are no longer based on a Level of Service (LOS) analysis, the City of Santa Ana has adopted the use of the LOS analysis as part of their impact guidelines in addition to an analysis with Vehicle Miles Traveled (VMT). The results of which are the basis of our traffic concerns.

It is our understanding via a phone message on November 5, 2021, from City of Santa Ana Senior Civil Engineer, Zed Kekula, that Tustin's concerns regarding the results of the LOS-based traffic analysis as it relates to impacts in Tustin and mitigation responsibilities will be addressed at a later date.

We would greatly appreciate written confirmation once this matter is continued. Please feel free to contact me at jwillkom@tustinca.org with any questions or concerns.

Very truly yours,

DocuSigned by:

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Justina L. Willkom
Community Development Director