

**Appendix A-a NOP, NOP Comment Letters, and Scoping Meeting Sign-In Sheet and Comments**

## Appendices

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California Environmental Quality Act  
**NOTICE OF PREPARATION AND SCOPING  
MEETING**

Date: February 26, 2020  
To: Responsible Agencies and Interested Parties  
Subject: Notice of Preparation and Scoping Meeting for the Santa Ana  
General Plan Program Environmental Impact Report

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To: Reviewing Agencies and Other Interested Parties

Project Title: Santa Ana General Plan

Project Applicant: City of Santa Ana

Notice of Preparation Review Period: 2/26/20 through 3/27/2020 (30 days)

Scoping Meeting: Thursday, March 5, 2020, Santa Ana Police Community Room

NOTICE IS HEREBY GIVEN that the City of Santa Ana (City) will prepare a program environmental impact report (EIR) for the Santa Ana General Plan. The City is the lead agency for the project. The purpose of this notice is (1) to serve as a Notice of Preparation of an EIR pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082, (2) to advise and solicit comments and suggestions regarding the scope and content of the EIR to be prepared for the proposed project, and (3) to notice the public scoping meeting.

The City determined that the proposed project would require preparation of a full-scope EIR; thus, an Initial Study was not prepared in conjunction with this Notice of Preparation.

## 1. Introduction

The City's General Plan was last comprehensively updated in 1982. Various updates to the City's Land Use Element, Circulation Element, Urban Design Element and Economic Development were completed in 1998. In March 2014 the City Council adopted the Santa Ana Strategic Plan. The Strategic Plan was the result of an extensive community outreach process and established specific goals, objectives and strategies to guide the City's major efforts. One of the key strategies identified is to complete a comprehensive update of the City's Existing General Plan. The updated General Plan will provide long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the Santa Ana community through 2045. The updated General Plan will address the eight topics required by state law as well as five optional topics. The topic of housing will also be addressed as a separate effort in late 2021 in accordance with state law.

## 2. Environmental Setting

### Project Location

The City of Santa Ana encompasses roughly 27 square miles of land in central Orange County. The cities of Orange and Costa Mesa border Santa Ana to the north and south, respectively. Santa Ana's western border connects with the cities of Garden Grove, Westminster, and Fountain Valley, while Santa Ana's eastern border touches the cities of Irvine and Tustin. Regional connectivity to the City of Santa Ana is provided by interstates 15 and 405 and by State Routes 22 and 55. The City of Santa Ana is the second largest city in Orange County in terms of both population (approximately 340,000 residents as of 2019) and workers (approximately 160,000 jobs as of 2019).

### 3. Project Description

The City of Santa Ana is in the process of preparing a comprehensive update to its existing General Plan. Santa Ana's "Golden City Beyond: A Shared Vision" General Plan is expected to be completed in 2020 and 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 the City's physical development, fiscal and environmental sustainability, and overall quality of life. The new Santa Ana General Plan will serve to identify areas of opportunity and provide options to enhance development potential in key areas of the city while bringing the City into compliance with recent state laws and reflect updates to current conditions and input from the general public, city staff, and other stakeholders.

Santa Ana's General Plan is based on a vision statement and core values established as part of an extensive multi-year community outreach effort, a Technical Advisory Committee, and a General Plan Advisory Group.

#### Vision Statement

"Santa Ana is a city that promotes the physical, social, and economic health and wellness of our people and our community. We celebrate our past, embrace the power of diversity, and work together to create economic and educational opportunities for the next generation, leading to a more sustainable and prosperous future."

#### Core Values

- » **Health.** The people of Santa Ana value a physical environment that encourages healthy lifestyles, a planning process that ensures that health impacts are considered, and a community that actively pursues policies and practices that improve the health of our residents.
- » **Equity.** Our residents value taking all necessary steps to ensure equitable outcomes, expanding access to the tools and resources that residents need, and to balance competing interests in an open and democratic manner.
- » **Sustainability.** Santa Ana values land use decisions that benefit future generations, plans for the impacts of climate change, and incorporates sustainable design practices at all level of the planning process.
- » **Culture.** Our community values efforts that celebrate our differences as a source of strength, preserve and build upon existing cultural resources, and nurture a citywide culture of empowered residents.
- » **Education.** We are a city that values the creation of lifelong learners, the importance of opening up educational opportunities to all residents and investing in educational programs that advance our residents' economic wellbeing.

#### General Plan Topics

State law requires that a general plan address eight specific topics, which each topic commonly presented as an element of the general plan. State law gives jurisdictions the discretion to incorporate optional topics and to address any of these topics in a single element or across multiple elements of the general plan. Santa Ana's General Plan will address the following eight mandatory and five optional topics:

##### Mandatory Topics

- Land Use
- Circulation
- Housing\*
- Environmental Justice\*\*
- Open Space
- Conservation
- Safety
- Noise

##### Optional Topics

- Health and Wellness
- Historic Preservation
- Urban Design
- Economic Prosperity
- Community Services

\* The updated General Plan will incorporate the current 2014–2021 Housing Element and no substantive changes are anticipated as part of the comprehensive general plan update. The topic of housing will be addressed as a separate effort in late 2021 in accordance with state law.

\*\* The topic of environmental justice will be incorporated throughout the General Plan, with goals and policies incorporated into multiple elements.

## Project Buildout

In coordination with the 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. Industrial Flex would be introduced where Industrial land use designations currently exist within each of the five focus areas in order to allow for cleaner industrial and commercial uses with live-work opportunities.

There are seven other planning areas that represent specific plans and other special zoning areas that were previously adopted: Adaptive Reuse Overlay (2014), Bristol Street Corridor Specific Plan (1991/2018), Harbor Mixed Use Corridor Specific Plan (2014), MainPlace Specific Plan (2019), Metro East Overlay Zone (2007/2018), Midtown Specific Plan (1996), and Transit Zoning Code Specific Development (2010). The potential for new development in these areas is based on the forecasted buildout at the time of the respective zoning document's adoption, minus the amount of new development built between their adoption date and 2019. The most recent adoption/amendment date for each zoning document is noted in parentheses.

Growth outside of the focus areas and special planning areas is expected to be incremental and limited. Some growth was projected for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan. Some growth was also projected for the commercial and retail area south of the West Santa Ana Boulevard focus area. Finally, some additional residential development is expected to occur on a small portion (five percent) of single-family and multi-family lots through the construction of second units.

Table 1 provides a statistical summary of the buildout potential associated with the General Plan compared to existing conditions. Figure 1 displays the draft General Plan Land Use Map while Figure 2 illustrates the boundaries of the five focus areas and special planning areas.

## 4. Probable Environmental Effects

The City has determined that a Program EIR will be prepared for the proposed General Plan. Section 15168 of the CEQA Guidelines states that a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways.

The Program EIR will be prepared in accordance with the requirements of CEQA Statute and Guidelines, as amended. Pursuant to Section 15146 of the CEQA Guidelines, the degree of specificity in the Program EIR will correspond to the degree of specificity involved in the proposed General Plan. The EIR will focus on the primary effects that can be expected to follow from adoption of the proposed project and will not be as detailed as an EIR on the specific development or construction projects that may follow. Based on the City's preliminary analysis of the project, the following environmental impact categories and their associated impact thresholds will be examined in the Program EIR:

Aesthetics	Greenhouse Gas Emissions	Public Services
Agricultural/Forest Resources	Hazards/Hazardous Materials	Recreation
Air Quality	Hydrology/Water Quality	Transportation
Biological Resources	Land Use/Planning	Tribal Cultural Resources
Cultural Resources	Mineral Resources	Utilities/Service Systems
Energy	Noise	Wildfire
Geology and Soils	Population/Housing	

The Draft EIR will address the short- and long-term effects of the General Plan on the environment. Mitigation measures will be proposed for impacts that are determined to be significant. A mitigation monitoring program will also be developed as required by Section 15150 of the CEQA Guidelines.

**5. Public Review Period**

This NOP will be available for a 30-day public review period from **February 26, 2020**, to **March 27, 2020**, on the City's website at <https://www.santa-ana.org/general-plan>. Hard copies will also be available at:

City of Santa Ana, Planning Division  
20 Civic Center Plaza, M-20  
Santa Ana, CA 92701

City of Santa Ana Public Library  
26 Civic Center Plaza  
Santa Ana, CA 92701

The City is seeking input from both agencies and members of the public on the scope and content of the environmental information and analysis in the EIR. Due to the time limits mandated by state law, written comments must be sent via mail, e-mail, or fax no later than 5:00 PM on **Thursday March 27, 2020**. Please send your comments at the earliest possible date to:

Verny Carvajal, Principal Planner  
City of Santa Ana Planning and Building Agency  
PO BOX 1988 (M-20)  
Santa Ana, CA 92702  
Email: [VCarvajal@santa-ana.org](mailto:VCarvajal@santa-ana.org)

**6. Public Scoping Meeting**

Pursuant to the California Public Resources Code Section 21083.9, the City will conduct a public scoping meeting. This meeting will provide a public forum for information dissemination and dialogue regarding the components of the proposed project and the environmental review process. Please note the main purpose of the public scoping meeting is to provide a project description and solicit comments to refine and/or expand the scope of the EIR. **Although staff will summarize the issues raised at these meetings, anyone wishing to make formal comments on the scope of the EIR must do so in writing.** The public scoping meeting will be held on:

**Date:** Thursday, March 5, 2020  
**Time:** from 6:00 to 7:30 PM  
**Location:** Santa Ana Police Community Room, 60 Civic Center Plaza, Santa Ana, CA 92701

**Table 1 Existing Conditions, Potential Growth, and Buildout Conditions in Santa Ana, 2020 to 2045**

PLANNING AREA	EXISTING <sup>1</sup>			GROWTH <sup>2</sup>			BUILDOUT		
	Housing Units	Bldg. Sq. Ft. <sup>3</sup>	Jobs	Housing Units	Bldg. Sq. Ft. <sup>3</sup>	Jobs	Housing Units	Bldg. Sq. Ft. <sup>3</sup>	Jobs
<b>FOCUS AREAS</b>	<b>6,380</b>	<b>12,849,259</b>	<b>29,931</b>	<b>17,481</b>	<b>3,233,332</b>	<b>9,542</b>	<b>23,861</b>	<b>16,082,591</b>	<b>39,473</b>
55 Freeway/Dyer Road	1,221	5,094,557	10,401	8,731	1,434,665	3,849	9,952	6,529,222	14,250
Grand Avenue/17 <sup>th</sup> Street	561	1,400,741	3,568	1,667	-689,325	-1,929	2,228	711,416	1,639
South Bristol Street	220	1,577,511	3,337	5,233	3,508,975	11,319	5,453	5,086,486	14,656
South Main Street	1,720	1,685,978	3,455	588	-739,316	-1,304	2,308	946,662	2,151
West Santa Ana Boulevard	2,658	3,090,472	9,170	1,262	-281,667	-2,393	3,920	2,808,805	6,777
<b>SPECIFIC PLAN / SPECIAL ZONING</b>	<b>4,685</b>	<b>13,924,891</b>	<b>38,548</b>	<b>15,839</b>	<b>3,033,554</b>	<b>1,154</b>	<b>20,524</b>	<b>16,958,445</b>	<b>39,702</b>
Adaptive Reuse Overlay Zone <sup>4</sup>	260	976,935	3,043	1,000	0	-476	1,260	976,935	2,567
Bristol Street Corridor Specific Plan	136	140,348	294	-1	2,791	-12	135	143,139	282
Harbor Corridor Specific Plan	1,324	1,767,937	3,286	3,298	200,045	-1,708	4,622	1,967,982	1,578
Main Place Specific Plan	0	1,108,080	2,216	1,900	1,318,843	3,164	1,900	2,426,923	5,380
Metro East Overlay Zone	844	2,516,056	7,524	4,707	2,169,891	4,734	5,551	4,685,947	12,258
Midtown Specific Plan	607	1,885,065	4,824	0	-66,812	-209	607	1,818,253	4,615
Transit Zoning Code	1,514	5,530,470	17,361	4,935	-591,204	-4,339	6,449	4,939,266	13,022
<b>ALL OTHER AREAS OF THE CITY <sup>5</sup></b>	<b>67,727</b>	<b>39,772,550</b>	<b>92,004</b>	<b>2,847</b>	<b>552,536</b>	<b>3,666</b>	<b>70,574</b>	<b>40,325,086</b>	<b>95,670</b>
<b>CITYWIDE TOTAL</b>	<b>78,792</b>	<b>66,546,700</b>	<b>160,483</b>	<b>36,167</b>	<b>6,819,422</b>	<b>14,362</b>	<b>114,959</b>	<b>73,366,122</b>	<b>174,845</b>

Source: City of Santa Ana, 2020.

1. Existing represents conditions as of December 2019 as derived from the City of Santa Ana Planning Information Network and projects already under construction per the January 2020 monthly development project report.

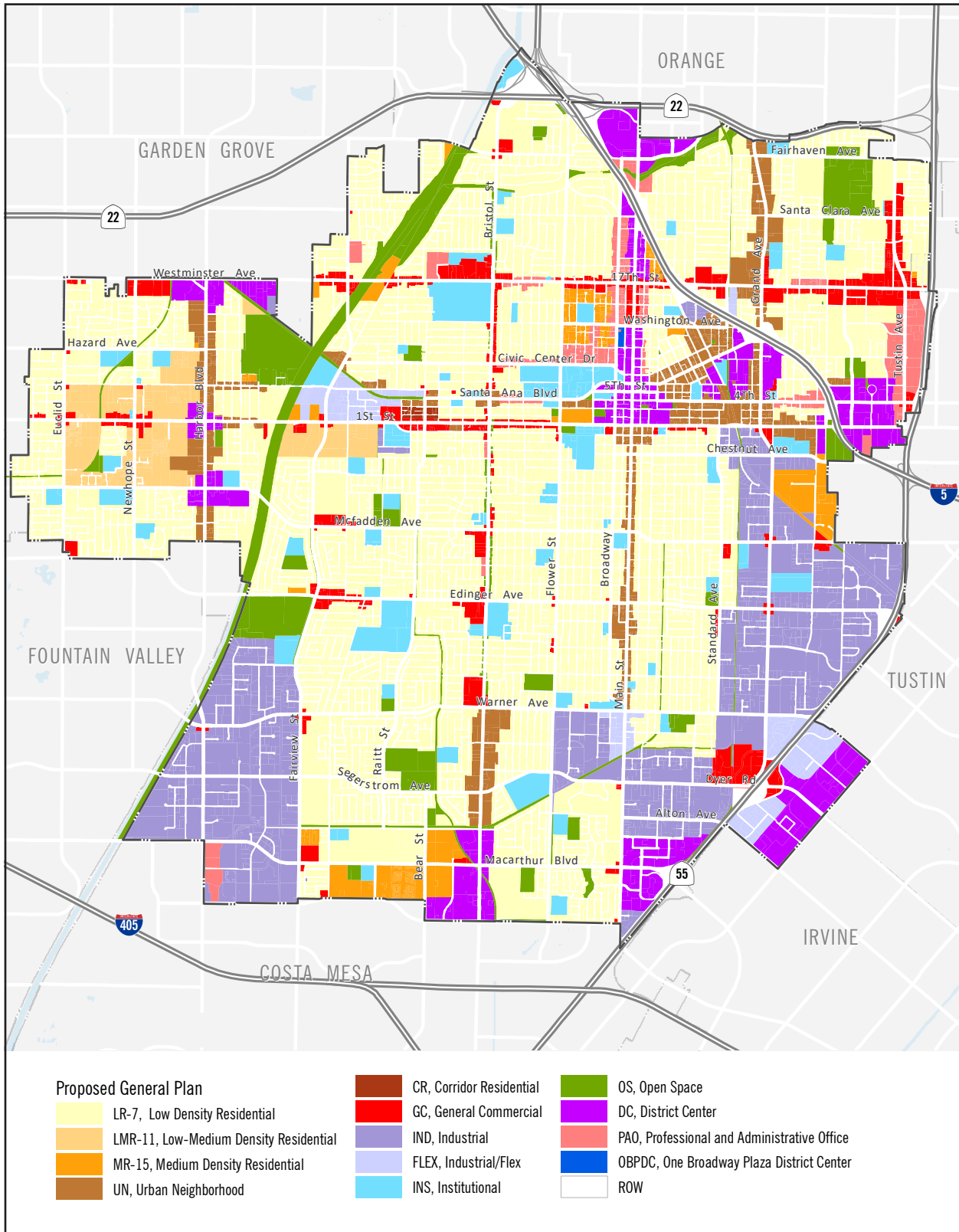
2. The potential growth for new development in specific plan/special zoning area is based on the forecasted buildout at the time of the respective zoning document's adoption, minus the amount of new development built between its adoption date and 2019.

3. Only includes nonresidential building square footage.

4. The figures shown on the row for the Adaptive Reuse Overlay represents parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.

5. The City has included an assumption for growth on a small portion (five percent) of residential parcels through the construction of second units, which is distributed throughout the City and is not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline and an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan, as well as the commercial and retail area south of the West Santa Ana Boulevard focus area.

Figure 1 - Proposed General Plan Land Use

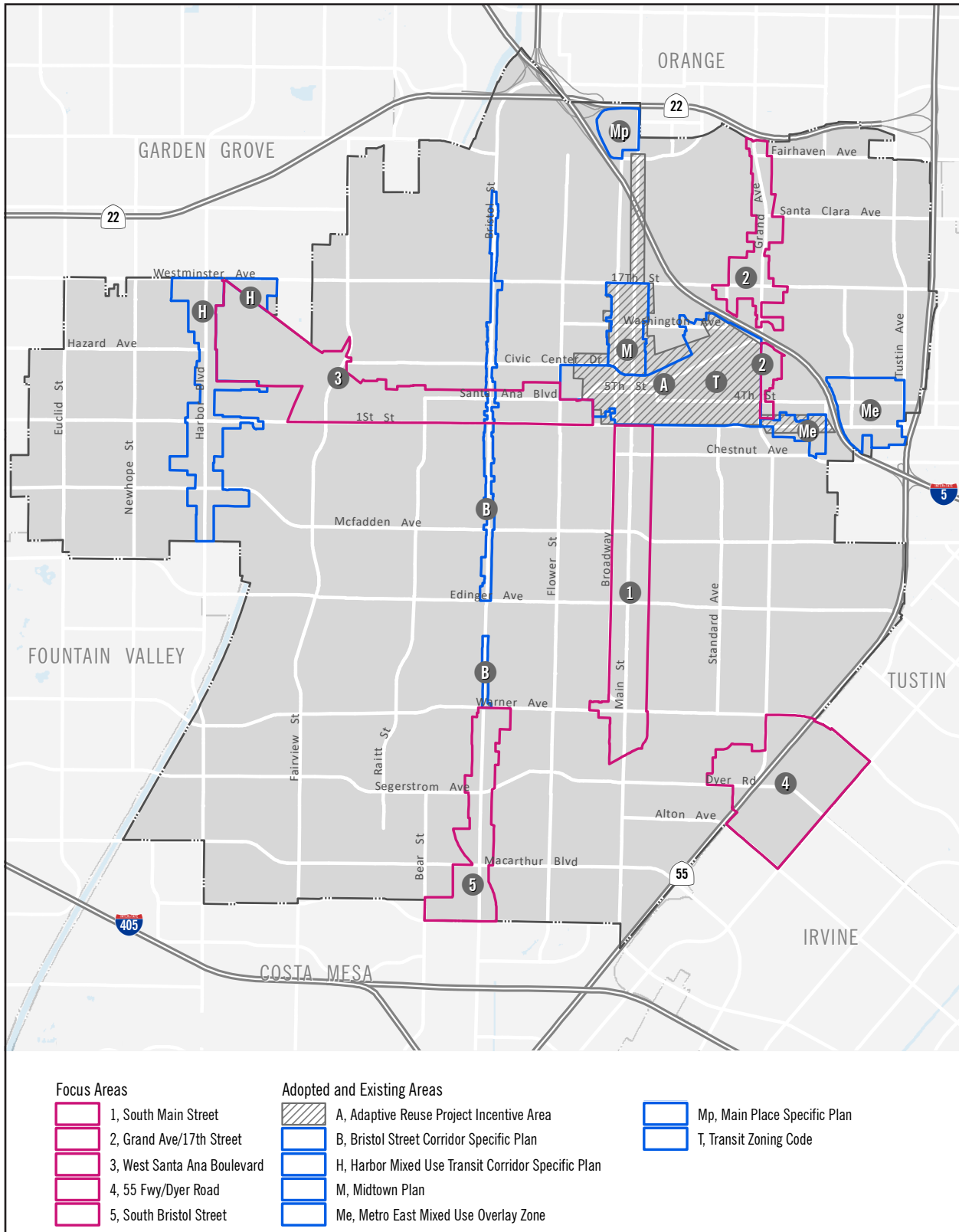


0 1  
Scale (Miles)





Figure 2 - Proposed General Plan Focus Areas and Other Special Planning Areas





THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

March 16, 2020

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

Via E-mail

Dear Mr. Carvajal:

Notice of Preparation  
for the City of Santa Ana General Plan Environmental Impact Report

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Preparation for the City of Santa Ana General Plan Environmental Impact Report (Plan). The proposed General Plan update will reflect goals set in the 2014 Santa Ana Strategic Plan, state law, and provide guidance on long-term policy regarding physical development, quality of life, economic health, and sustainability through 2045. The City of Santa Ana is the CEQA Lead Agency. This letter contains Metropolitan's comments as a potentially affected public agency.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies, serving approximately 19 million people in portions of six counties in Southern California, including Riverside County. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Metropolitan owns and operates the Orange County Feeder, East Orange County Feeder 2 and Santa Ana Cross Feeder pipelines in the plan area. The Orange County Feeder and East Orange County Feeder pipelines vary from 36-79 inches-inside-diameter and run north-south through the plan area. Santa Ana Cross Feeder is 18-20 inches-inside-diameter and runs east-west through the center of the plan area. The pipelines distribute treated water (drinking water) to Orange County member agencies. See attached map for locations of Metropolitan infrastructure, referenced above.

Metropolitan is concerned with indirect effects to Metropolitan's facilities that may result. Future development and land use conditions associated with the proposed plan must not restrict any of Metropolitan's day-to-day operations, access or repair to these facilities. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities

Verny Carvajal, Principal Planner

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March 16, 2020

and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipeline to excessive vehicle, impact or vibratory loads.

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-7663. To assist applicants in preparing plans that are compatible with Metropolitan's facilities and easements, we have attached the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. Please contact Ms. Jolene Ditmar at (213) 217-6184 or [jditmar@mwdh2o.com](mailto:jditmar@mwdh2o.com) if you require further assistance.

Very truly yours,



Sean Carlson

Team Manager, Environmental Planning Section

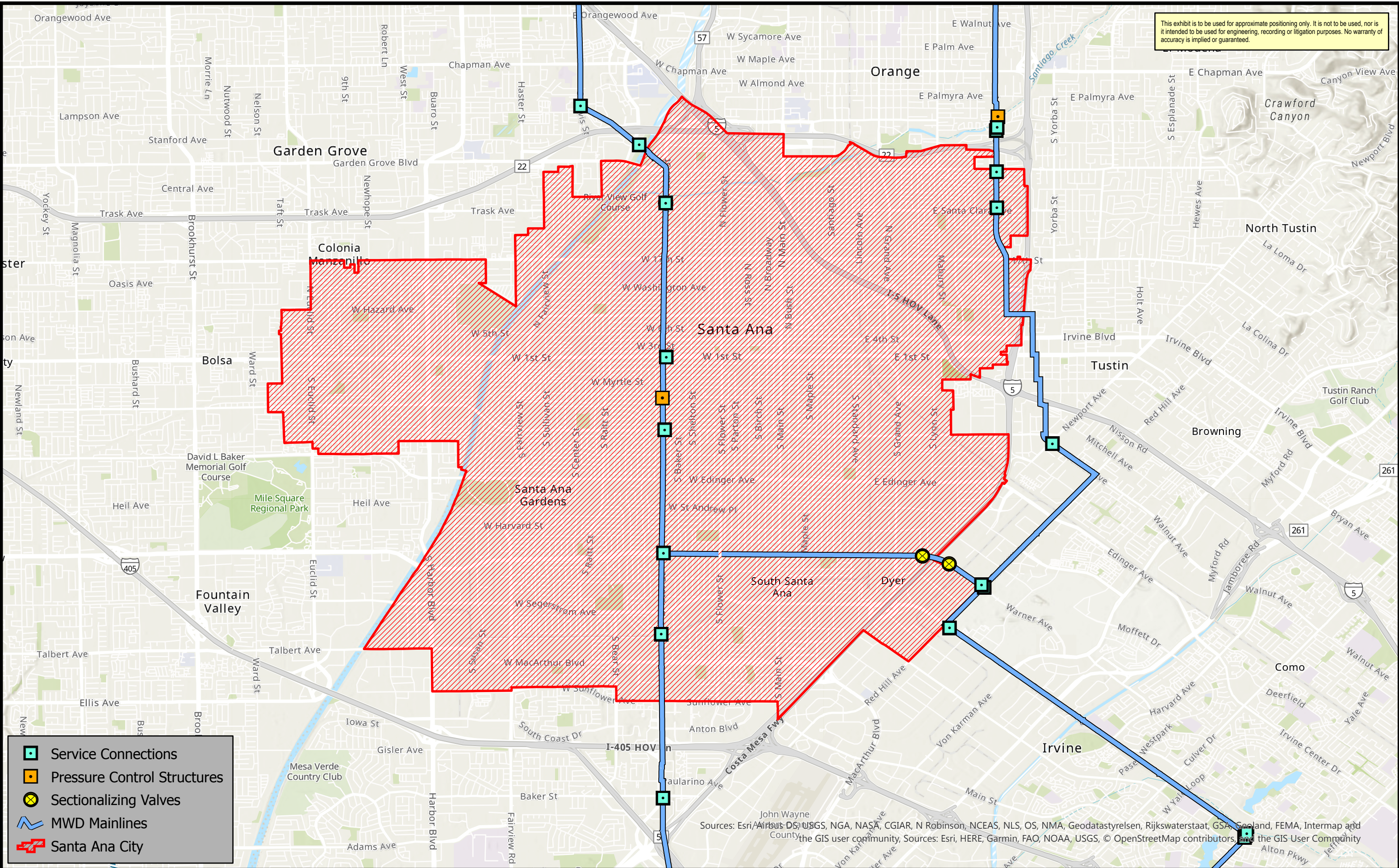
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Enclosures:

- (1) Map
- (2) Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way

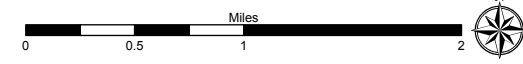
This exhibit is to be used for approximate positioning only. It is not to be used, nor is it intended to be used for engineering, recording or litigation purposes. No warranty of accuracy is implied or guaranteed.



ZIPProjects\Special\_Requests\Jolene\_Dilmar\GIS\General\_Plans\General\_Plans.aprx. [Printed 3/11/2020] Photography Date: Bing Prepared by: Tom Bleicher (Geodetics & Mapping Team) Checked by: Jolene Dilmar Job#: GIS20-03-13

-  Service Connections
-  Pressure Control Structures
-  Sectionalizing Valves
-  MWD Mainlines
-  Santa Ana City

### City of Santa Ana General Plan Update MWD Distribution System



**Guidelines for  
Improvements and Construction Projects Proposed  
in the Area of  
Metropolitan's Facilities and Rights-of-Way**



**July 2018**

Prepared By:  
The Metropolitan Water District of Southern California  
Substructures Team, Engineering Services  
700 North Alameda Street  
Los Angeles, California 90012

**Additional Copies:** To obtain a copy of this document, please contact the Engineering Services Group, Substructures Team.

**Disclaimer**

*Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as deemed prudent, to assure that project plans are correct. The appropriate representative from Metropolitan must be contacted at least two working days, before any work activity in proximity to Metropolitan's facilities.*

*It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.*

*PUBLICATION HISTORY:*

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*Initial Release*

*July 2018*

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## 1.0 GENERAL INFORMATION

**Note: Underground Service Alert at 811 must be notified at least two working days before excavating in proximity to Metropolitan's facilities.**

### 1.1 Introduction

These guidelines provide minimum design and construction requirements for any utilities, facilities, developments, and improvements, or any other projects or activities, proposed in or near Metropolitan Water District of Southern California (Metropolitan) facilities and rights-of-way. Additional conditions and stipulations may also be required depending on project and site specific conditions. Any adverse impacts to Metropolitan's conveyance system, as determined by Metropolitan, will need to be mitigated to its satisfaction.

All improvements and activities must be designed so as to allow for removal or relocation at builder or developer expense, as set forth in the paramount rights provisions of Section 20.0. Metropolitan shall not be responsible for repair or replacement of improvements, landscaping or vegetation in the event Metropolitan exercises its paramount rights powers.

### 1.2 Submittal and Review of Project Plans/Utilities and Maps

Metropolitan requires project plans/utilities be submitted for all proposed activities that may impact Metropolitan's facilities or rights-of-way. Project plans shall include copies of all pertinent utilities, sewer line, storm drain, street improvement, grading, site development, landscaping, irrigation and other plans, all tract and parcel maps, and all necessary state and federal environmental documentation. Metropolitan will review the project plans and provide written approval, as it pertains to Metropolitan's facilities and rights-of-way. Written approval from Metropolitan must be obtained, prior to the start of any activity or construction in the area of Metropolitan's facilities or rights-of-way. Once complete project plans and supporting documents are submitted to Metropolitan, it generally takes 30 days to review and to prepare a detailed written response. Complex engineering plans that have the potential for significant impacts on Metropolitan's facilities or rights-of-way may require a longer review time.

Project plans, maps, or any other information should be submitted to Metropolitan's Substructures Team at the following mailing address:

**Attn: Substructures Team  
The Metropolitan Water District of Southern California  
700 North Alameda St.  
Los Angeles, CA 90012**

**General Mailing Address: P.O. Box 54153  
Los Angeles, CA 90054-0153**

**Email: [EngineeringSubstructures@mwdh2o.com](mailto:EngineeringSubstructures@mwdh2o.com)**

For additional information, or to request prints of detailed drawings for Metropolitan's facilities and rights-of-way, please contact Metropolitan's Substructures Team at 213-217-7663 or [EngineeringSubstructures@mwdh2o.com](mailto:EngineeringSubstructures@mwdh2o.com).

### **1.3 Identification of Metropolitan's Facilities and Rights-of-Way**

Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's, with official recording data, on the following:

- A. All applicable plans
- B. All applicable tract and parcel maps

Metropolitan's rights-of-ways and existing survey monuments must be tied dimensionally to the tract or parcel boundaries. Metropolitan's Records of Survey must be referenced on the tract and parcel maps with the appropriate Book and Page.

## **2.0 General Requirements**

### **2.1 Vehicular Access**

Metropolitan must have vehicular access along its rights-of-way at all times for routine inspection, patrolling, operations, and maintenance of its facilities and construction activities. All proposed improvements and activities must be designed so as to accommodate such vehicular access.

### **2.2 Fences**

Fences installed across Metropolitan's rights-of-way must include a 16-foot-wide gate to accommodate vehicular access by Metropolitan. Additionally, gates may be required at other specified locations to prevent unauthorized entry into Metropolitan's rights-of-way.

All gates must accommodate a Metropolitan lock or Knox-Box with override switch to allow Metropolitan unrestricted access. There should be a minimum 20-foot setback for gates from the street at the driveway approach. The setback is necessary to allow Metropolitan vehicles to safely pull off the road prior to opening the gate.

### **2.3 Driveways and Ramps**

Construction of 16-foot-wide commercial-type driveway approaches is required on both sides of all streets that cross Metropolitan's rights-of-way. Access ramps, if necessary, must be a minimum of 16 feet wide.

There should be a minimum 20-foot setback for gates from the street at the driveway approach. Grades of ramps and access roads must not exceed 10 percent; if the slope of an access ramp or road must exceed 10 percent due to topography, then the ramp or road must be paved.

### **2.4 Walks, Bike Paths, and Trails**

All walkways, bike paths, and trails along Metropolitan's rights-of-way must be a minimum 12-foot wide and have a 50-foot or greater radius on all horizontal curves if also used as Metropolitan's access roads. Metropolitan's access routes, including all walks and drainage facilities crossing the access routes, must be constructed to American Association of State Highway and Transportation Officials (AASHTO) H-20 loading standards (see Figure 1). Additional requirements will be placed on equestrian trails to protect the water quality of Metropolitan's pipelines and facilities.

## **2.5 Clear Zones**

A 20-foot-wide clear zone is required to be maintained around Metropolitan's manholes and other above-ground facilities to accommodate vehicular access and maintenance. The clear zone should slope away from Metropolitan's facilities on a grade not to exceed 2 percent.

## **2.6 Slopes**

Cut or fill slopes proposed within Metropolitan's rights-of-way must not exceed 10 percent. The proposed grade must not worsen the existing condition. This restriction is required to facilitate Metropolitan use of construction and maintenance equipment and allow uninhibited access to above-ground and below-ground facilities.

## **2.7 Structures**

Construction of structures of any type is not allowed within the limits of Metropolitan's rights-of-way to avoid interference with the operation and maintenance of Metropolitan's facilities and possible construction of future facilities.

Footings and roof eaves of any proposed buildings adjacent to Metropolitan's rights-of-way must meet the following criteria:

- A. Footings and roof eaves must not encroach onto Metropolitan's rights-of-way.
- B. Footings must not impose any additional loading on Metropolitan's facilities.
- C. Roof eaves must not overhang onto Metropolitan's rights-of-way.

Detailed plans of footings and roof eaves adjacent to Metropolitan's rights-of-way must be submitted for Metropolitan's review and written approval, as pertains to Metropolitan's facilities.

## **2.8 Protection of Metropolitan Facilities**

Metropolitan facilities within its rights-of-way, including pipelines, structures, manholes, survey monuments, etc., must be protected from damage by the project proponent or property owner, at no expense to Metropolitan. The exact location, description and method of protection must be shown on the project plans.

## **2.9 Potholing of Metropolitan Pipelines**

Metropolitan's pipelines must be potholed in advance, if the vertical clearance between a proposed utility and Metropolitan's pipeline is indicated to be 4 feet or less. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipeline. Notice is required, a minimum of three working days, prior to any potholing activity.

## **2.10 Jacked Casings or Tunnels**

### **A. General Requirements**

Utility crossings installed by jacking, or in a jacked casing or tunnel under/over a Metropolitan pipeline, must have at least 3 feet of vertical clearance between the outside diameter of the pipelines and the jacked pipe, casing, or tunnel. The actual

cover over Metropolitan's pipeline shall be determined by potholing, under Metropolitan's supervision.

Utilities installed in a jacked casing or tunnel must have the annular space between the utility and the jacked casing or tunnel filled with grout. Provisions must be made for grouting any voids around the exterior of the jacked pipe, casing, or tunnel.

#### B. Jacking or Tunneling Procedures

Detailed jacking, tunneling, or directional boring procedures must be submitted to Metropolitan for review and approval. The procedures must cover all aspects of operation, including, but not limited to, dewatering, ground control, alignment control, and grouting pressure. The submittal must also include procedures to be used to control sloughing, running, or wet ground, if encountered. A minimum 10-foot clearance must be maintained between the face of the tunneling or receiving pits and outside edges of Metropolitan's facility.

#### C. Shoring

Detailed drawings of shoring for jacking or receiving pits must be submitted to Metropolitan for review and written-approval. (See Section 10 for shoring requirements).

#### D. Temporary Support

Temporary support of Metropolitan's pipelines may be required when a utility crosses under a Metropolitan pipeline and is installed by means of an open trench. Plans for temporary support must be reviewed and approved in writing by Metropolitan. (See Section 11, Supports of Metropolitan Facilities).

### **3.0 Landscaping**

#### **3.1 Plans**

All landscape plans must show the location and limits of Metropolitan's right-of-way and the location and size of Metropolitan's pipeline and related facilities therein. All landscaping and vegetation shall be subject to removal without notice, as may be required by Metropolitan for ongoing maintenance, access, repair, and construction activities. Metropolitan will not be financially responsible for the removal of any landscaping and vegetation.

#### **3.2 Drought-Tolerant Native and California Friendly Plants**

Metropolitan recommends use of drought-tolerant native and California Friendly® plants (excluding sensitive plants) on proposed projects. For more information regarding California Friendly® plants refer to [www.bewaterwise.com](http://www.bewaterwise.com).

#### **3.3 Trees**

Trees are generally prohibited within Metropolitan's rights-of-way as they restrict Metropolitan's ability to operate, maintain and/or install new pipeline(s) located within these rights-of-way. Metropolitan will not be financially responsible for the removal and replacement of any existing trees should they interfere with access and any current or future Metropolitan project located within the right-of-way.

### **3.4 Other Vegetation**

Shrubs, bushes, vines, and groundcover are generally allowed within Metropolitan's rights-of-way. Larger shrubs are not allowed on Metropolitan fee properties; however, they may be allowed within its easements if planted no closer than 15 feet from the outside edges of existing or future Metropolitan facilities. Only groundcover is allowed to be planted directly over Metropolitan pipeline, turf blocks or similar is recommended to accommodate our utility vehicle access. Metropolitan will not be financially responsible for the removal and replacement of the vegetation should it interfere with access and any current or future Metropolitan project.

### **3.5 Irrigation**

Irrigation systems are acceptable within Metropolitan's rights-of-way, provided valves and controllers are located near the edges of the right-of-way and do not interfere with Metropolitan vehicular access. A shutoff valve should also be located along the edge of the right-of-way that will allow the shutdown of the system within the right-of-way should Metropolitan need to do any excavation. No pooling or saturation of water above Metropolitan's pipeline and right-of-way is allowed. Additional restrictions apply to non-potable water such as Recycled Water and are covered on Table 3 of Page 20.

### **3.6 Metropolitan Vehicular Access**

Landscape plans must show Metropolitan vehicular access to Metropolitan's facilities and rights-of-way and must be maintained by the property owner or manager or homeowners association at all times. Walkways, bike paths, and trails within Metropolitan's rights-of-way may be used as Metropolitan access routes. (See Section 2.4, Walks, Bike Paths, and Trails).

## **4.0 General Utilities**

Note: For non-potable piping like sewer, hazardous fluid, storm drain, disinfected tertiary recycled water and recycled water irrigation see Table 1 through Table 3.

### **4.1 Utility Structures**

Permanent utility structures (e.g., manholes, power poles, pull boxes, electrical vaults, etc.) are not allowed within Metropolitan's rights-of-way. Metropolitan requests that all permanent utility structures within public streets be placed as far from its pipelines and facilities as practical, but not closer than 5 feet from the outside edges of Metropolitan facilities.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation.

### **4.2 Utility Crossings**

Metropolitan requests a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and any utility crossing the pipeline. Utility lines crossing Metropolitan's pipelines must be as perpendicular to the pipeline as possible. Cross-section drawings, showing proposed locations and elevations of utility lines and locations of Metropolitan's pipelines and limits of rights-of-way, must be submitted with utility plans, for all



crossings. Metropolitan's pipeline must be potholed under Metropolitan's supervision at the crossings (See Section 2.9).

#### **4.3 Longitudinal Utilities**

Installation of longitudinal utilities is generally not allowed along Metropolitan's rights-of-way. Within public streets, Metropolitan requests that all utilities parallel to Metropolitan's pipelines and appurtenant structures (facilities) be located as far from the facilities as possible, with a minimum clearance of 5 feet from the outside edges of the pipeline.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation (for more information See Table 1 on Page 18).

#### **4.4 Underground Electrical Lines**

Underground electrical conduits (110 volts or greater) which cross a Metropolitan's pipeline must have a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and the electrical lines. Longitudinal electrical lines, including pull boxes and vaults, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipeline or structures.

#### **4.5 Fiber Optic Lines**

Fiber optic lines installed by directional boring require a minimum of 3 feet of vertical clearance when boring is over Metropolitan's pipelines and a minimum of 5 feet of vertical clearance when boring is under Metropolitan's pipelines. Longitudinal fiber optic lines, including pull boxes, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipelines or structures. Potholing must be performed, under Metropolitan's supervision, to verify the vertical clearances are maintained.

#### **4.6 Overhead Electrical and Telephone Lines**

Overhead electrical and telephone lines, where they cross Metropolitan's rights-of-way, must have a minimum 35 feet of clearance, as measured from the ground to the lowest point of the overhead line. Overhead electrical lines poles must be located at least 30 feet laterally from the edges of Metropolitan's facilities or outside Metropolitan's right-of-way, whichever is greater.

Longitudinal overhead electrical and or telephone lines in public streets should have a minimum separation of 10 feet from the edge of a Metropolitan pipelines or structures where possible.

#### **4.7 Sewage Disposal Systems**

Sewage disposal systems, including leach lines and septic tanks, must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or the edge of its facilities, whichever is greater. If soil conditions are poor, or other adverse site-specific conditions exist, a minimum distance of 150 feet is required. They must also comply with local and state health code requirements as they relate to sewage disposal systems in proximity to major drinking water supply pipelines.

#### **4.8 Underground Tanks**

Underground tanks containing hazardous materials must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or edge of its facilities, whichever is greater. In addition, groundwater flow should be considered with the placement of underground tanks down-gradient of Metropolitan's facilities.

### **5.0 Specific Utilities: Non-Potable Utility Pipelines**

In addition to Metropolitan's general requirements, installation of non-potable utility pipelines (e.g., storm drains, sewers, and hazardous fluids pipelines) in Metropolitan's rights-of-way and public street rights-of-way must also conform to the State Water Resources Control Board's Division of Drinking Water (DDW) regulation (Waterworks Standards) and guidance for separation of water mains and non-potable pipelines and to applicable local county health code requirements. Written approval is required from DDW for the implementation of alternatives to the Waterworks Standards and, effective December 14, 2017, requests for alternatives to the Waterworks Standards must include information consistent with: DDW's [Waterworks Standards Main Separation Alternative Request Checklist](#).

**In addition to the following general guidelines, further review of the proposed project must be evaluated by Metropolitan and requirements may vary based on site specific conditions.**

- A. Sanitary Sewer and Hazardous Fluids (General Guideline See Table 1 on Page 18)
- B. Storm Drain and Recycled Water (General Guideline See Table 2 on Page 19)
- C. Irrigation with Recycled Water (General Guideline See Table 3 on Page 20)
- D. Metropolitan generally does not allow Irrigation with recycled water to be applied directly above its treated water pipelines
- E. Metropolitan requests copies of project correspondence with regulating agencies (e.g., Regional Water Quality Control Board, DDW); regarding the application of recycled water for all projects located on Metropolitan's rights-of-way

### **6.0 Cathodic Protection/Electrolysis Test Stations**

#### **6.1 Metropolitan Cathodic Protection**

Metropolitan's existing cathodic protection facilities in the vicinity of any proposed work must be identified prior to any grading or excavation. The exact location, description, and type of protection must be shown on all project plans. Please contact Metropolitan for the location of its cathodic protection stations.

#### **6.2 Review of Cathodic Protection Systems**

Metropolitan must review any proposed installation of impressed-current cathodic protection systems on pipelines crossing or paralleling Metropolitan's pipelines to determine any potential conflicts with Metropolitan's existing cathodic protection system.

## **7.0 Drainage**

### **7.1 Drainage Changes Affecting Metropolitan Rights-of-Way**

Changes to existing drainage that could affect Metropolitan's rights-of-way require Metropolitan's approval. The project proponent must provide acceptable solutions to ensure Metropolitan's rights-of-way are not negatively affected by changes in the drainage conditions. Plans showing the changes, with a copy of a supporting hydrology report and hydraulic calculations, must be submitted to Metropolitan for review and approval. Long term maintenance of any proposed drainage facilities must be the responsibility of the project proponent, City, County, homeowner's association, etc., with a clear understanding of where this responsibility lies. If drainage must be discharged across Metropolitan's rights-of-way, it must be carried across by closed conduit or lined open channel and must be shown on the plans.

### **7.2 Metropolitan's Blowoff and Pumpwell Structures**

Any changes to the existing local watercourse systems will need to be designed to accommodate Metropolitan's blowoff and pumpwell structures, which periodically convey discharged water from Metropolitan's blowoff and pumping well structures during pipeline dewatering. The project proponents' plans should include details of how these discharges are accommodated within the proposed development and must be submitted to Metropolitan for review and approval. Any blowoff discharge lines impacted must be modified accordingly at the expense of the project proponent.

## **8.0 Grading and Settlement**

### **8.1 Changes in Cover over Metropolitan Pipelines**

The existing cover over Metropolitan's pipelines must be maintained unless Metropolitan determines that proposed changes in grade and cover do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance capability. Load and settlement or rebound due to change in cover over a Metropolitan pipeline or ground in the area of Metropolitan's rights-of-way will be factors considered by Metropolitan during project review.

In general, the minimum cover over a Metropolitan pipeline is 4 feet and the maximum cover varies per different pipeline. Any changes to the existing grade may require that Metropolitan's pipeline be potholed under Metropolitan's supervision to verify the existing cover.

### **8.2 Settlement**

Any changes to the existing topography in the area of Metropolitan's pipeline or right-of-way that result in significant settlement or lateral displacement of Metropolitan's pipelines are not acceptable. Metropolitan may require submittal of a soils report showing the predicted settlement of the pipeline at 10-foot intervals for review. The data must be carried past the point of zero change in each direction and the actual size and varying depth of the fill must be considered when determining the settlement. Possible settlement due to soil collapse, rebound and lateral displacement must also be included.

In general, the typical maximum allowed deflection for Metropolitan's pipelines must not exceed a deflection of 1/4-inch for every 100 feet of pipe length. Metropolitan may require additional information per its Geotechnical Guidelines. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

## **9.0 Construction Equipment**

### **9.1 Review of Proposed Equipment**

Use of equipment across or adjacent to Metropolitan's facilities is subject to prior review and written approval by Metropolitan. Excavation, backfill, and other work in the vicinity of Metropolitan's facilities must be performed only by methods and with equipment approved by Metropolitan. A list of all equipment to be used must be submitted to Metropolitan a minimum of 30 days before the start of work.

- A. For equipment operating within paved public roadways, equipment that imposes loads not greater than that of an AASHTO H-20 vehicle (see Figure 1 on Page 21) may operate across or adjacent to Metropolitan's pipelines provided the equipment operates in non-vibratory mode and the road remains continuously paved.
- B. For equipment operating within unpaved public roadways, when the total cover over Metropolitan's pipeline is 10 feet or greater, equipment imposing loads no greater than those imposed by an AASHTO H-20 vehicle may operate over or adjacent to the pipeline provided the equipment is operated in non-vibratory mode. For crossings, vehicle path shall be maintained in a smooth condition, with no breaks in grade for 3 vehicle lengths on each side of the pipeline.

### **9.2 Equipment Restrictions**

In general, no equipment may be used closer than 20 feet from all Metropolitan above-ground structures. The area around the structures should be flagged to prevent equipment encroaching into this zone.

### **9.3 Vibratory Compaction Equipment**

Vibratory compaction equipment may not be used in vibratory mode within 20 feet of the edge of Metropolitan's pipelines.

### **9.4 Equipment Descriptions**

The following information/specifications for each piece of equipment should be included on the list:

- A. A description of the equipment, including the type, manufacturer, model year, and model number. For example, wheel tractor-scraper, 1990 Caterpillar 627E.
- B. The empty and loaded total weight and the corresponding weight distribution. If equipment will be used empty only, it should be clearly stated.
- C. The wheel base (for each axle), tread width (for each axle), and tire footprint (width and length) or the track ground contact (width and length), and track gauge (center to center of track).

## **10.0 Excavations Close to Metropolitan Facilities**

### **10.1 Shoring Design Submittal**

Excavation that impacts Metropolitan's facilities requires that the contractor submit an engineered shoring design to Metropolitan for review and acceptance a minimum of 30 days before the scheduled start of excavation. Excavation may not begin until the shoring design is accepted in writing by Metropolitan.

Shoring design submittals must include all required trenches, pits, and tunnel or jacking operations and related calculations. Before starting the shoring design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements, particularly as to any special procedures that may be required.

### **10.2 Shoring Design Requirements**

Shoring design submittals must be stamped and signed by a California registered civil or structural engineer. The following requirements apply:

- A. The submitted shoring must provide appropriate support for soil adjacent to and under Metropolitan's facilities.
- B. Shoring submittals must include detailed procedures for the installation and removal of the shoring.
- C. Design calculations must follow the Title 8, Chapter 4, Article 6 of the California Code of Regulations (CCR) guidelines. Accepted methods of analysis must be used.
- D. Loads must be in accordance with the CCR guidelines or a soils report by a geotechnical consultant.
- E. All members must be secured to prevent sliding, falling, or kickouts.

Metropolitan's pipelines must be located by potholing under Metropolitan's supervision before the beginning construction. Use of driven piles within 20 feet of the centerline of Metropolitan's pipeline is not allowed. Piles installed in drilled holes must have a minimum 2-foot clearance between Metropolitan's pipeline and the edge of the drilled hole, and a minimum of 1-foot clearance between any part of the shoring and Metropolitan's pipeline.

## **11.0 Support of Metropolitan Facilities**

### **11.1 Support Design Submittal**

If temporary support of a Metropolitan facility is required, the contractor shall submit a support design plan to Metropolitan for review and approval a minimum of 30 days before the scheduled start of work. Work may not begin until the support design is approved in writing by Metropolitan. Before starting design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements.

### **11.2 Support Design Requirements**

Support design submittals must be prepared, stamped, and signed by a California registered civil or structural engineer. The following requirements apply:

- A. Support drawings must include detailed procedures for the installation and removal of the support system.
- B. Design calculations must follow accepted practices, and accepted methods of analysis must be used.
- C. Support designs must show uniform support of Metropolitan's facilities with minimal deflection.
- D. The total weight of the facility must be transferred to the support system before supporting soil is fully excavated.
- E. All members must be secured to prevent sliding, falling, or kickouts.

## **12.0 Backfill**

### **12.1 Metropolitan Pipeline Not Supported**

In areas where a portion of Metropolitan pipeline is not supported during construction, the backfill under and to an elevation of 6 inches above the top of the pipeline must be one-sack minimum cement sand slurry. To prevent adhesion of the slurry to Metropolitan's pipeline, a minimum 6-mil-thick layer of polyethylene sheeting or similar approved sheeting must be placed between the concrete support and the pipeline.

### **12.2 Metropolitan Pipeline Partially Exposed**

In areas where a Metropolitan pipeline is partially exposed during construction, the backfill must be a minimum of 6 inches above the top of the pipeline with sand compacted to minimum 90 percent compaction.

### **12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA)**

In areas where a Metropolitan cut and cover conduit is exposed, the following guidelines apply:

- A. No vehicle or equipment shall operate over or cross the conduit when the cover is less than 3 feet.
- B. Track-type dozer with a gross vehicle weight of 12,000 lbs or less may be used over the conduit when the cover is a minimum of 3 feet.
- C. Wheeled vehicles with a gross vehicle weight of 8,000 lbs or less may operate over the conduit when the cover is a minimum of 4 feet.
- D. Tracked dozer or wheeled vehicle should be used to push material over the conduit from the side.
- E. Tracked dozer or wheeled vehicle should gradually increase cover on one side of the conduit and then cross the conduit and increase cover on the other side of the conduit. The cover should be increased on one side of the conduit until a maximum of 2 feet of fill has been placed. The cover over the conduit is not allowed to be more than 2 feet higher on one side of the conduit than on the other side.
- F. The cover should be gradually increased over the conduit until the grade elevations have been restored.

## **13.0 Piles**

### **13.1 Impacts on Metropolitan Pipelines**

Pile support for structures could impose lateral, vertical and seismic loads on Metropolitan's pipelines. Since the installation of piles could also cause settlement of Metropolitan pipelines, a settlement and/or lateral deformation study may be required for pile installations within 50 feet of Metropolitan's pipelines. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

### **13.2 Permanent Cast-in-place Piles**

Permanent cast-in-place piles must be constructed so that down drag forces of the pile do not act on Metropolitan's pipeline. The pile must be designed so that down drag forces are not developed from the ground surface to springline of Metropolitan's pipeline.

Permanent cast-in-place piles shall not be placed closer than 5 feet from the edge of Metropolitan's pipeline. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

## **14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines**

Protective slabs must be permanent cast-in-place concrete protective slabs configured in accordance with Drawing SK-1 (See Figure 2 on Page 22).

The moments and shear for the protective slab may be derived from the American Association of State Highway and Transportation Officials (AASHTO). The following requirements apply:

- A. The concrete must be designed to meet the requirements of AASHTO
- B. Load and impact factors must be in accordance with AASHTO. Accepted methods of analysis must be used.
- C. The protective slab design must be stamped and signed by a California registered civil or structural engineer and submitted to Metropolitan with supporting calculations for review and approval.

Existing protective slabs that need to be lengthened can be lengthened without modification, provided the cover and other loading have not been increased.

## **15.0 Blasting**

At least 90 days prior to the start of any drilling for rock excavation blasting, or any blasting in the vicinity of Metropolitan's facilities, a site-specific blasting plan must be submitted to Metropolitan for review and approval. The plan must consist of, but not be limited to, hole diameters, timing sequences, explosive weights, peak particle velocities (PPV) at Metropolitan pipelines/structures, and their distances to blast locations. The PPV must be estimated based on a site-specific power law equation. The power law equation provides the peak particle velocity versus the scaled distance and must be calibrated based on measured values at the site.

## **16.0 Metropolitan Plan Review Costs, Construction Costs and Billing**

### **16.1 Plan Review Costs**

Metropolitan plan reviews requiring 8 labor hours or less are generally performed at no cost to the project proponent. Metropolitan plan reviews requiring more than 8 labor hours must be paid by the project proponent, unless the project proponent has superior rights at the project area. The plan review will include a written response detailing Metropolitan's comments, requirements, and/or approval.

A deposit of funds in the amount of the estimated cost and a signed letter agreement will be required from the project proponent before Metropolitan begins or continues a detailed engineering plan review that exceeds 8 labor hours.

### **16.2 Cost of Modification of Facilities Performed by Metropolitan**

Cost of modification work conducted by Metropolitan will be borne by the project proponent, when Metropolitan has paramount/prior rights at the subject location.

Metropolitan will transmit a cost estimate for the modification work to be performed (when it has paramount/prior rights) and will require that a deposit, in the amount of the estimate, be received before the work will be performed.

### **16.3 Final Billing**

Final billing will be based on the actual costs incurred, including engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the total cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice for the additional amount will be forwarded for payment.

## **17.0 Street Vacations and Reservation of Easements for Metropolitan**

A reservation of an easement is required when all or a portion of a public street where Metropolitan facilities are located is to be vacated. The easement must be equal to the street width being vacated or a minimum 40 feet. The reservation must identify Metropolitan as a "public entity" and not a "public utility," prior to recordation of the vacation or tract map. The reservation of an easement must be submitted to Metropolitan for review prior to final approval.

## **18.0 Metropolitan Land Use Guidelines**

If you are interested in obtaining permission to use Metropolitan land (temporary or long term), a Land Use Form must be completed and submitted to Metropolitan for review and consideration. A nonrefundable processing fee is required to cover Metropolitan's costs for reviewing your request. Land Use Request Forms can be found at:

[http://mwdh2o.com/PDF\\_Doing\\_Your\\_Business/4.7.1\\_Land\\_Use\\_Request\\_form\\_revised.pdf](http://mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Land_Use_Request_form_revised.pdf)

The request should be emailed to [RealEstateServices@mwdh2o.com](mailto:RealEstateServices@mwdh2o.com), or contact the Real Property Development and Management (RPDM) Group at (213) 217-7750.



After the initial application form has been submitted, Metropolitan may require the following in order to process your request:

- A. A map indicating the location(s) where access is needed, and the location & size (height, width and depth) of any invasive subsurface activity (boreholes, trenches, etc.).
- B. The California Environmental Quality Act (CEQA) document(s) or studies that have been prepared for the project (e.g., initial study, notice of exemption, Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), etc.).
- C. A copy of an ACORD insurance certification naming Metropolitan as an additional insured, or a current copy of a statement of self-insurance.
- D. Confirmation of the legal name of the person(s) or entity(ies) that are to be named as the permittee(s) in the entry permit.
- E. Confirmation of the purpose of the land use.
- F. The name of the person(s) with the authority to sign the documents and any specific signature title block requirements for that person or any other persons required to sign the document (i.e., legal counsel, Board Secretary/Clerk, etc.).
- G. A description of any vehicles that will have access to the property. The exact make or model information is not necessary; however, the general vehicle type, expected maximum dimensions (height, length, width), and a specific maximum weight must be provided.

Land use applications and proposed use of the property must be compatible with Metropolitan's present and/or future use of the property. Any preliminary review of your request by Metropolitan shall not be construed as a promise to grant any property rights for the use of Metropolitan's property.

## **19.0 Compliance with Environmental Laws and Regulations**

As a public agency, Metropolitan is required to comply with all applicable environmental laws and regulations related to the activities it carries out or approves. Consequently, project plans, maps, and other information must be reviewed to determine Metropolitan's obligations pursuant to state and federal environmental laws and regulations, including, but not limited to:

- A. California Environmental Quality Act (CEQA) (Public Resources Code 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500-15387)
- B. Federal Endangered Species Act (ESA) of 1973, 16 U.S.C. §§ 1531, et seq.
- C. California Fish and Game Code Sections 2050-2069 (California ESA)
- D. California Fish and Game Code Section 1602
- E. California Fish and Game Code Sections 3511, 4700, 5050 and 5515 (California fully protected species)
- F. Federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§ 703-712
- G. Federal Clean Water Act (including but not limited to Sections 404 and 401) 33 U.S.C. §§ 1342, 1344)

- H. Porter Cologne Water Quality Control Act of 1969, California Water Code §§ 13000-14076.
- I. Title 22, California Code of Regulations, Chapter 16 (California Waterworks Standards), Section 64572 (Water Main Separation)

Metropolitan may require the project applicant to pay for any environmental review, compliance and/or mitigation costs incurred to satisfy such legal obligations.

## **20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way**

Facilities constructed within Metropolitan's rights-of-way shall be subject to the paramount right of Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove or relocate any facilities from its rights-of-way, such removal and replacement or relocation shall be at the expense of the owner of the facility.

## **21.0 Disclaimer and Information Accuracy**

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as you may deem prudent, to assure that your project plans are correct. The relevant representative from Metropolitan must be called at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

**Table 1: General Guidelines for Pipeline Separation between Metropolitan’s Pipeline<sup>1</sup> and Sanitary Sewer<sup>2</sup> or Hazardous Fluid Pipeline<sup>3</sup>**

<p><u>Pipeline Crossings</u></p>	<p>Metropolitan requires that sanitary sewer and hazardous fluid pipelines that cross Metropolitan’s pipelines have special pipe construction (no joints) <b>and</b> secondary containment<sup>4</sup>. This is required for the full width of Metropolitan’s rights-of-way or within 10 feet tangent to the outer edges of Metropolitan’s pipeline within public streets. Additionally, sanitary sewer and hazardous fluid pipelines crossing Metropolitan’s pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance between the top and the bottom of Metropolitan’s pipeline and the pipe casing.</p> <p>These requirements apply to all sanitary sewer crossings regardless if the sanitary sewer main is located below or above Metropolitan’s pipeline.</p>
<p><u>Parallel Pipeline</u></p>	<p>Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requires that all parallel sanitary sewer, hazardous fluid pipelines and/or non-potable utilities be located a minimum of 10 feet from the outside edges of Metropolitan’s pipelines. When 10-foot horizontal separation criteria cannot be met, longitudinal pipelines require special pipe construction (no joints) <b>and</b> secondary containment<sup>4</sup>.</p>
<p><u>Sewer Manhole</u></p>	<p>Sanitary sewer manholes are not allowed within Metropolitan’s rights-of-way. Within public streets, Metropolitan requests manholes parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment<sup>5</sup>.</p>

Notes:

<sup>1</sup> Separation distances are measured from the outer edges of each pipe.

<sup>2</sup> Sanitary sewer requirements apply to all recycled water treated to less than disinfected tertiary recycled water (disinfected secondary recycled water or less). Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

<sup>3</sup> Hazardous fluids include e.g., oil, fuels, chemicals, industrial wastes, wastewater sludge, etc.

<sup>4</sup> Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

<sup>5</sup> Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.

**Table 2: General Guidelines for Pipeline Separation between Metropolitan’s Pipeline<sup>1</sup> and Storm Drain and/or Disinfected Tertiary Recycled Water<sup>2</sup>**

<p><b><u>Pipeline Crossings</u></b></p>	<p>Metropolitan requires crossing pipelines to be special pipe construction (no joints) or have secondary containment<sup>3</sup> within 10-feet tangent to the outer edges of Metropolitan’s pipeline. Additionally, pipelines crossing Metropolitan’s pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance.</p>
<p><b><u>Parallel Pipeline</u></b></p>	<p>Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requests that all parallel pipelines be located a minimum of 10 feet from the outside edges of Metropolitan’s pipelines. When 10-foot horizontal separation criteria cannot be met, special pipe construction (no joints) or secondary containment<sup>3</sup> are required.</p>
<p><b><u>Storm Drain Manhole</u></b></p>	<p>Permanent utility structures (e.g., manhole, catch basin, inlets) are not allowed within Metropolitan’s rights-of-way. Within public streets, Metropolitan requests all structures parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment<sup>4</sup>.</p>

**Notes:**

<sup>1</sup> Separation distances are measured from the outer edges of each pipe.

<sup>2</sup> Disinfected tertiary recycled water as defined in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

<sup>3</sup> Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

<sup>4</sup> Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.

**Table 3: General Guidelines for Pipeline Separation<sup>1</sup> between Metropolitan’s Pipeline and Recycled Water<sup>2,4</sup> Irrigations**

<p>Pressurized recycled irrigation mainlines</p>	<ul style="list-style-type: none"> <li>• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing pressurized recycled irrigation mainlines must be special pipe construction (no joints) or have secondary containment<sup>3</sup> within 10-feet tangent to the outer edges of Metropolitan’s pipeline.</li> <li>• Longitudinal - must maintain a minimum 10-foot horizontal separation and route along the perimeter of Metropolitan’s rights-of-way where possible.</li> </ul>
<p>Intermittently Energized Recycled Water Irrigation System Components</p>	<ul style="list-style-type: none"> <li>• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing irrigation laterals within 5-feet tangent to the outer edges of Metropolitan’s pipeline must be special pipe construction (no joints) or have secondary containment<sup>3</sup>.</li> <li>• Longitudinal – must maintain a minimum 5-foot horizontal separation between all intermittently energized recycled water irrigation system components (e.g. irrigation lateral lines, control valves, rotors) and the outer edges of Metropolitan’s pipeline. Longitudinal irrigation laterals within 5-feet tangent to the outer edges of Metropolitan’s pipeline must be special pipe construction (no joints) or have secondary containment<sup>3</sup>.</li> </ul>
<p>Irrigation Structures</p>	<p>Irrigation structures such as meters, pumps, control valves, etc. must be located outside of Metropolitan’s rights-of-way.</p>
<p>Irrigation spray rotors near Metropolitan’s aboveground facilities</p>	<p>Irrigation spray rotors must be located a minimum of 20-foot from any Metropolitan above ground structures with the spray direction away from these structures. These rotors should be routinely maintained and adjusted as necessary to ensure no over-spray into 20-foot clear zones.</p>
<p>Irrigations near open canals and aqueducts</p>	<p>Irrigation with recycled water near open canals and aqueducts will require a setback distance to be determined based on site-specific conditions. Runoff of recycled water must be contained within an approved use area and not impact Metropolitan facilities. Appropriate setbacks must also be in place to prevent overspray of recycled water impacting Metropolitan’s facilities.</p>

**Notes:**

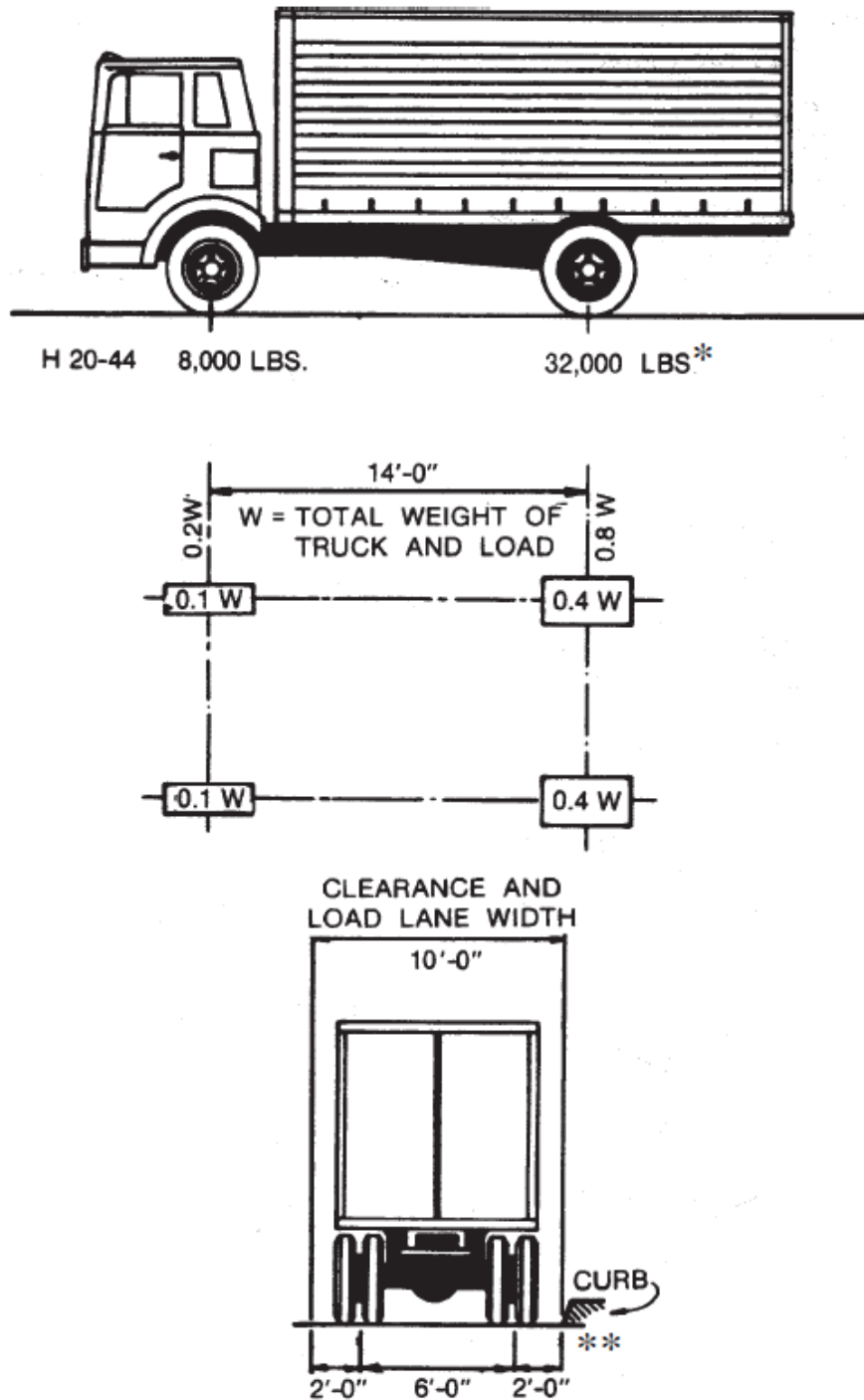
<sup>1</sup> Separation distances are measured from the outer edges of each pipe.

<sup>2</sup> Requirements for recycled water irrigation apply to all levels of treatment of recycled water for non-potable uses. Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

<sup>3</sup> Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

<sup>4</sup> Irrigation with recycled water shall not be applied directly above Metropolitan’s treated water pipelines.

Figure 1: AASHTO H-20 Loading



Note: The H loadings consist of a two-axle truck or the corresponding lane loadings as illustrated above. The H loadings are designated "H" followed by a number indicating the gross weight in tons of the standard truck.





SENT VIA E-MAIL:

March 17, 2020

[VCarvajal@santa-ana.org](mailto:VCarvajal@santa-ana.org)

Verny Carvajal, Principal Planner  
City of Santa Ana, Planning and Building Agency  
P.O. Box 1988 (M-20)  
Santa Ana, CA 92702

**Notice of Preparation of a Program Environmental Impact Report for the Proposed  
Santa Ana General Plan**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Program Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Program EIR upon its completion and public release. Note that copies of the Program EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Program EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the Program EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

On March 3, 2017, the South Coast AQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on March 23, 2017.

<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO<sub>x</sub>) emissions in 2023 and an additional 55 percent NO<sub>x</sub> reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on South Coast AQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005<sup>2</sup>. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. South Coast AQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance<sup>3</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

South Coast AQMD has also developed both regional and localized air quality significance thresholds. South Coast AQMD staff requests that the Lead Agency compare the emissions to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources,

<sup>2</sup> South Coast AQMD. 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

<sup>3</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operational activities, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

### **Mobile Source Health Risk Assessment**

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways and other sources of air pollution, South Coast AQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

Based on review of Figure 1 enclosed in the Notice of Preparation, South Coast AQMD staff found that sensitive land uses (e.g., residential uses) may be located within close proximity to Interstate 5 and State Route 22. Sensitive receptors would be exposed to diesel particulate matter (DPM) emitted from heavy-duty, diesel-fueled on-road vehicles. DPM is a toxic air contaminant and a carcinogen. Since sensitive receptors would be exposed to toxic emissions, South Coast AQMD staff recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)<sup>4</sup> in the Program EIR to disclose the potential health risks<sup>5</sup>. The HRA will facilitate the purpose and goal of CEQA on public disclosure and enable decision-makers with meaningful information to make an informed decision on project approval. This will also foster informed public participation by providing the public with useful information that is needed to understand the potential health risks from living and working within close proximity to freeways.

### **Mitigation Measures**

If the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD's *CEQA Air Quality Handbook*
- South Coast AQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

<sup>4</sup> South Coast AQMD. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>5</sup> South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- California Air Pollution Control Officers Association's (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **Health Risks Reduction Strategies**

As stated above, the Proposed Project is located within close proximity to freeways. Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

Enhanced filtration systems have limitations. South Coast AQMD staff recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that South Coast AQMD conducted to investigate filters<sup>6</sup>, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the sensitive receptors (e.g., residents). It is typically assumed that the filters operate 100 percent of the time while sensitive receptors at the Proposed Project are indoors, and the environmental analysis does not generally account for the times when sensitive receptors have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

Because of the limitations, to ensure that enhanced filters are enforceable throughout the lifetime of the Proposed Project as well as effective in reducing exposures to DPM emissions, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular maintenance and monitoring of filters in the environmental analysis. To facilitate a good faith effort at full disclosure and provide useful information to people who will live at the Proposed Project, the environmental analysis should include the following information, at a minimum:

- Disclose the potential health impacts to sensitive receptors from living in close proximity of sources of air pollution and the reduced effectiveness of air filtration system when windows are open and/or when receptors are outdoor (e.g., in the common and open space areas);
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are inspected regularly;
- Provide information to sensitive receptors on where the MERV filters can be purchased;
- Disclose the potential increase in energy costs for running the HVAC system to sensitive receptors;
- Provide recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units to sensitive receptors;

<sup>6</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

- Identify the responsible entity such as sensitive receptors themselves (e.g., residents), Homeowner's Association, or property management for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if sensitive receptors should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose any ongoing cost sharing strategies, if any, for the purchase and replacement of the enhanced filtration units;
- Set City-wide or Project-specific criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Develop a City-wide or Project-specific process for evaluating the effectiveness of the enhanced filtration units at the Proposed Project.

### **Alternatives**

If the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Program EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits**

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Program EIR. For more information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

### **Data Sources**

South Coast AQMD rules and relevant air quality reports and data are available by calling the South Coast AQMD's Public Information Center at (909) 396-2001. Much of the information available through the Public Information Center is also available via the South Coast AQMD's webpage (<http://www.aqmd.gov>).

South Coast AQMD staff is available to work with the Lead Agency to ensure that project's air quality impacts are accurately evaluated and mitigated where feasible. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov), should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

ORC200303-03

Control Number



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION  
Historically known as The San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

March 20, 2020

Project Name: Santa Ana General Plan

Dear Verny Carvajal,

Thank you for your letter dated February 26, 2020 regarding AB52 consultation. The above proposed project location is within our Ancestral Tribal Territory; therefore, our Tribal Government requests to schedule a consultation with you as the lead agency, to discuss the project and the surrounding location in further detail.

Please contact us at your earliest convenience. ***Please Note: AB 52, "consultation" shall have the same meaning as provided in SB 18 (Govt. Code Section 65352.4).***

Thank you for your time,

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation  
1(844)390-0787



# AIRPORT LAND USE COMMISSION

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FOR ORANGE COUNTY

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3160 Airway Avenue • Costa Mesa, California 92626 • 949.252.5170 fax: 949.252.6012

March 26, 2020

Verny Carvajal, Principal Planner  
City of Santa Ana Planning and Building Agency  
P.O. Box 1988, M-20  
Santa Ana, CA 92702

**Subject: Comments on the Notice of Preparation of Program Environmental Impact Report (EIR) for Santa Ana General Plan**

Dear Mr. Carvajal:

Thank you for the opportunity to review the Notice of Preparation (NOP) for the City of Santa Ana General Plan in the context of the *Airport Environs Land Use Plan (AELUP) for John Wayne Airport (JWA)*. We wish to offer the following comments and respectfully request consideration of these comments as you proceed with your DEIR and General Plan Update.

The City of Santa Ana is located within the AELUP Notification Area for JWA. The DEIR and General Plan should address height restrictions and imaginary surfaces by discussing Federal Aviation Administration (FAA) Federal Aviation Regulation (FAR) Part 77 as the criteria for determining height restrictions for projects located within the airport planning area. To ensure the safe operation of aircraft activity at JWA, structures anywhere in the JWA airport planning area should not exceed the applicable elevations defined in FAR Part 77 (Objects Affecting Navigable Air Space). The General Plan should include height policy language and a mitigation measure in the EIR that states that no buildings will be allowed to penetrate the FAR Part 77 imaginary surfaces for JWA to ensure the protection of its airspace.

Development proposals within the City, which include the construction or alteration of structures more than 200 feet above ground level, require filing with the FAA and Airport Land Use Commission (ALUC) notification. Projects meeting this threshold must comply with procedures provided by Federal and State law, and with all conditions of approval imposed or recommended by FAA and ALUC including filing a Notice of Proposed Construction or Alteration (FAA Form 7460-1). Depending on the maximum building heights that will be allowed within the General Plan, the City may wish to consider a mitigation and condition of approval specifying this 200 feet above ground level height

threshold. In addition, any project that penetrates the Notification Surface for JWA is required to file FAA Form 7460-1.

Portions of the City of Santa Ana fall within the 60 and 65 dB CNEL noise contours for JWA including a portion of the 55 Freeway/Dyer Road planning area. The DEIR and General Plan Update should include policies and mitigations for development within these contours, especially if mixed-use/residential development would be permitted. Per the *AELUP for JWA*, all residential units within the 65 dB CNEL contour are typically inconsistent in this area unless it can be shown conclusively that such units are sufficiently sound attenuated for present and projected noise exposure so as not to exceed an interior standard of 45 dB CNEL. However, the ALUC recommends that residential uses not be permitted within the 65 dB CNEL contour. As for residential development within the 60 dB CNEL contour, the ALUC may not find residential units incompatible in this area, but would strongly recommend that residential units be limited or excluded from this area unless sufficiently sound attenuated not to exceed an interior level of 45 dB.

We also recommend that the DEIR and the General Plan Update identify if the development of heliports will be allowed within your jurisdiction. Should the development of heliports occur within your jurisdiction, proposals to develop new heliports may be submitted through the City to the ALUC for review and action pursuant to Public Utilities Code Section 21661.5. Proposed heliport projects must comply fully with the state permit procedure provided by law and with all conditions of approval imposed or recommended by FAA, by the ALUC for Orange County and by Caltrans/Division of Aeronautics.

To address consistency with the *AELUP for Heliports* we suggest adding the following language to your General Plan Update and inclusion as a mitigation measure in the EIR:

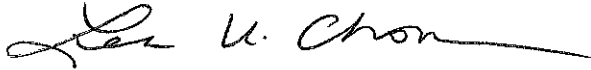
“The City will ensure that development proposals including the construction or operation of a heliport or helistop comply fully with permit procedures under State law, including referral of the project to the ALUC by the applicant, and with all conditions of approval imposed or recommended by the Federal Aviation Administration (FAA), ALUC, and Caltrans, including the filing of a Form 7480-1 (Notice of Landing Area Proposal) with the FAA. This requirement shall be in addition to all other City development requirements.”

Section 21676 of the PUC requires that prior to the adoption or amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the Airport Land Use Commission pursuant to Section 21675, the local agency shall first refer the proposed action to the ALUC. We recommend that the City include policy in its General Plan and a mitigation measure in the EIR that states that the City shall refer projects to the Airport Land Use Commission (ALUC) for Orange County as required by Section 21676 of the California Public Utilities Code to determine consistency of projects with the *AELUP for JWA*.



The Commission requests that referrals for determinations be submitted to the ALUC after the city's Planning Commission hearing and before the City Council action. Since the ALUC meets on the third Thursday afternoon of each month, submittals must be received in the ALUC office by the first of the month to ensure sufficient time for review, analysis, and agendaing. For additional information, please contact Julie Fitch at (949) 252-2584 or at [jfitch@ocair.com](mailto:jfitch@ocair.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Lea U. Choum", with a long horizontal flourish extending to the right.

Lea U. Choum  
Executive Officer

cc: Airport Land Use Commissioners



State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 South Coast Region  
 3883 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
 www.wildlife.ca.gov

GAVIN NEWSOM, Governor  
 CHARLTON H. BONHAM, Director



March 26, 2020

Mr. Verny Carvajal  
 City of Santa Ana  
 PO Box 1988 (M-20)  
 Santa Ana, CA 92702

Dear Mr. Carvajal:

**Subject: Santa Ana General Plan Program Environmental Impact Report (PROJECT) NOTICE OF PREPARATION (NOP) OF A PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) SCH# 2020029087**

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) from the City of Santa Ana (City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW ROLE**

CDFW is California’s **Trustee Agency** for fish and wildlife resources, and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

**PROJECT DESCRIPTION SUMMARY**

**Proponent:** City of Santa Ana (City)

**Objective:** The objective of the Project is to update the City’s existing General Plan to guide development and conservation for the next 25 years through 2045. Five regions are identified as focus areas to be enhanced through development.

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

**Location:** The City of Santa Ana encompasses roughly 27 square miles of land in central Orange County. The City is bordered to the north by Orange, to the south by Costa Mesa, to the west by Garden Grove, Westminster, and Fountain Valley, and to the east by Tustin and Irvine. The Santa Ana River traverses through the northwestern quadrant of the City. Special status species with the potential to occur in the region include: Steelhead - southern California Distinct Population Segment (DPS) (*Oncorhynchus mykiss irideus*; Endangered Species Act (ESA) listed endangered), coast horned lizard (*Phrynosoma blainvillii*; California Species of Special Concern (SSC)), Crotch bumble bee (*Bombus crotchii*; Candidate for CESA-listed endangered), Mexican long-tongued bat (*Choeronycteris mexicana*; SSC), and American peregrine falcon (*Falco peregrinus anatum*; FPS).

**Timeframe:** The comprehensive update to the exiting General Plan is anticipated to be completed in 2020 and will guide development and conservation through 2045.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the potential for the Project to have a significant impact on biological resources, CDFW agrees that a Program Environmental Impact Report is appropriate for the Project.

### I. Potential Impacts to Santa Ana River

**Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?**

#### COMMENT #1:

**Issue:** The Proposed General Plan focus area along West Santa Ana Boulevard intersects the Santa Ana River corridor as well as adjacent open space areas. Development within that focus area may potentially affect biological resources associated with riparian habitat or neighboring open space.

#### CDFW Recommendations To Minimize Significant Impacts:

1. The Proposed General Plan focus area along West Santa Ana Boulevard intersects the Santa Ana River corridor. Historically, the Santa Ana River and tributaries supported federally endangered southern California steelhead (<https://wildlife.ca.gov/Conservation/Fishes/Coastal-Rainbow-Trout-Steelhead>). California Fish and Game Code § 5901 states that it is unlawful to construct or maintain any device or contrivance that prevents, impedes, or tends to prevent or impede the passing of fish up and down stream.

In accordance with California Fish and Game Code, we recommend that the PEIR include an analysis of any proposed major stream crossings in the context of fish passage. The analysis should include, but not be limited to, steelhead presence or historic presence, existing conditions including habitat and barrier assessments, any known projects to remove barriers or

restore habitat that would affect or be affected by this project, and cumulative impacts to steelhead populations and/or habitat resulting from this project.

2. CDFW has responsibility for wetland and riparian habitats. It is the policy of CDFW to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion that would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the PEIR and must compensate for the loss of function and value of a wildlife corridor.

3. CDFW considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). Consequently, if any associated Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

#### Mitigation for the Project-related Biological Impacts

4. The PEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance.

5. For proposed preservation and/or restoration, the PEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:

[http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB\\_FieldSurveyForm.pdf](http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf). The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/plants\\_and\\_animals.asp](http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp).

## FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

## CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a PEIR to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jessie Lane, environmental scientist at (858) 636-3159 or [Jessie.Lane@wildlife.ca.gov](mailto:Jessie.Lane@wildlife.ca.gov).

Sincerely,



David A. Mayer  
Acting Environmental Program Manager  
South Coast Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento

## REFERENCES

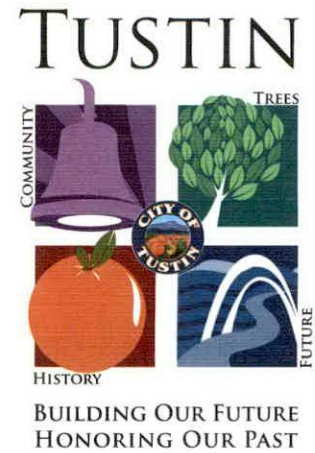
Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

# Community Development Department

March 26, 2020

Mr. Verny Carvajal  
Principal Planner  
City of Santa Ana  
Planning and Building Agency  
PO BOX 1988 (M-20)  
Santa Ana, CA 92702



**SUBJECT: REVIEW OF NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF SANTA ANA GENERAL PLAN**

Dear Mr. Carvajal:

Thank you for the opportunity to provide comments on the Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) for the City of Santa Ana General Plan. According to the NOP, the proposed General Plan will guide the City of Santa Ana's development for the next 25 years and will provide options to increase development potential in several areas of the City while bringing the City into compliance with recent state laws and reflecting community input and updates to current conditions

The proposed General Plan envisions up to 36,167 additional housing units, 6,819,422 square feet of additional nonresidential space, and 14,362 new jobs between 2020 and 2045. As proposed, 13,438 of these housing units and 3,604,556 square feet of the commercial space could be built in close proximity to Tustin within the Metro East Overlay Zone and the 55 Freeway/Dyer Road Focus Area.

The City of Tustin offers the following comments at this time:

1. **Land Use Intensification** - The City of Tustin is concerned with the significant changes in land uses (i.e., from commercial and industrial buildings to residential mixed use) along Red Hill Avenue and Dyer Road that are proposed by the Santa Ana General Plan, the Bowery project, or that have occurred recently with the approval and construction of The Heritage project at 2001 East Dyer Road. These land use changes could result in significant traffic and park impacts and affect planned mitigations. The cumulative impacts to traffic and parks are likely to be substantial. Therefore, there should be detailed overall projections of the anticipated changes in land uses in the PEIR, so the cumulative impacts related to traffic and parks and the associated mitigation can be documented.
2. **Technical Analyses** – It is unclear how the development potential identified in Table 1 of the NOP was calculated. No technical analyses or supporting documentation was provided with the NOP. Undoubtedly there will be capacity issues that need to be addressed in accommodating the proposed development. No project alternative was identified in the NOP, yet there have been project alternatives identified for the Focus Areas. How was the development potential identified in Table 1 of the NOP concluded to be the preferred option? There does not appear to be any conclusive analysis provided within public documents available on the City of Santa Ana website.

Therefore, the Draft PEIR should identify project alternatives and provide the technical analyses which identify that the proposed development can be accommodated with the appropriate facilities and levels of service. Apart from community outreach efforts, there appears to have been no technical evaluation of the proposed General Plan Update provided to the public.

3. **Parks and Open Space** – Resident feedback within the Community Outreach – The First Conversation Executive Summary noted the lack of open space, need for better park maintenance, lack of community centers, and unsafe parks within Santa Ana. However, neither of the project alternatives presented through community outreach identified any open space proposed within the 55 Freeway/Dyer Road Focus Area. The City of Santa Ana Municipal Code requires residential projects to pay park acquisition and development fees or dedicate land for park and recreational purposes. It is unclear from the NOP whether any additional park land or open space is proposed as part of the Santa Ana General Plan Update. According to Figure 1 of the NOP, no additional open space is proposed in the 55 Freeway/Dyer Road Focus Area. Open space within future residential projects that may include private open space and perimeter open space is not equivalent to park land provided. In any event, the Santa Ana General Plan should require land for park and recreational purposes to meet the City of Santa Ana’s minimum standard of “two (2) acres of property devoted to parks and recreational purposes for each thousand (1,000) persons residing within the City of Santa Ana.” There is an average 2018 household size of 4.5 persons in the City of Santa Ana per the Southern California Association of Government’s 2019 Profile of the City of Santa Ana. This equates to a minimum of approximately 89.6 acres of new parkland needed to serve the 9,952 housing units projected at build-out for the Focus Area, as there are no park facilities currently existing in the Focus Area.

It is also notable that the Santa Ana goal of two (2) acres per 1,000 residents falls short of the widely held minimum standard of three (3) acres per 1,000 residents as established under the Quimby Act (CA Government Code Section 66477). As shown in the table below, the minimum General Plan park acreage goals of many surrounding jurisdictions are higher than that of Santa Ana.

City	General Plan Minimum Parkland Acreage Goal
Costa Mesa	4.26 acres per 1,000 residents
Fountain Valley	13.2 acres per 1,000 residents (existing); 3-5 acre goal
Garden Grove	2.0 acres per 1,000 residents for parkland; 5.0 acres per 1,000 residents for open space
Irvine	5.0 acres per 1,000 residents
Orange	3.0 acres per 1,000 residents
Santa Ana	2.0 acres per 1,000 residents
Tustin	3.0 acres per 1,000 residents
Westminster	3.0 acres per 1,000 residents

Policy 1.4 – Park Connectivity of the Open Space Element from the Santa Ana General Plan Policy Framework (GPPF) proposes to establish and enhance options for residents to access existing and new park facilities through safe walking, bicycling, and transit routes. There is a

fragmented and absent sidewalk network and there are no parkland facilities existing within the 55 Freeway/Dyer Road Focus Area. Further, the 55 Freeway creates a barrier to those properties currently proposed for residential uses. The closest park facilities are across Red Hill Avenue within Tustin Legacy and are within both biking and walking distance of the Focus Area.

The proposed Veterans Sports Park at Tustin Legacy, for example, will be three times larger and about half the distance from the Project site than the closest park in Santa Ana and will offer new, state of art facilities that will be attractive to park users. The analysis in the PEIR should consider the quality, amenities, and attractiveness of nearby parks when estimating park usage.

If additional sufficient parkland is not identified in the Santa Ana General Plan, residents of future projects may be unable to find adequate parks in Santa Ana and may negatively impact parks and overburden parkland facilities in adjacent jurisdictions, including Tustin. These impacts must be mitigated. An analysis in the PEIR of the proposed compliance with the City of Santa Ana's park standards should focus on the potential to physically deteriorate existing and future recreational facilities in the City of Tustin, as the nearest existing and planned large scale recreational facilities to the 55 Freeway/Dyer Road Focus Area are located in the City of Tustin.

The apparent lack of commitment to open space and parkland by the City of Santa Ana is troubling given the Focus Area's adjacency to the City of Tustin and Tustin Legacy. Community outreach identified Santa Ana residents' need for additional and better park facilities. It is highly likely that residents within the Focus Area will use Tustin Legacy park facilities due to their close proximity, convenience, safety, and likely enhanced level of maintenance compared to Santa Ana park facilities based on resident feedback obtained from Santa Ana's community outreach. This will place an unplanned and undue burden on Tustin Legacy facilities.

4. **Parks and Open Space Studies** - A comprehensive study of parkland demand should be conducted to evaluate the impacts of the General Plan buildout on Tustin facilities. It is recommended that the minimum park facilities as required by the General Plan be accommodated within the Focus Area. Thresholds tied to the development and upzoning of any properties should be required to ensure the development of the minimum parkland facilities within the Focus Area. The PEIR should also include a study that analyzes how far residents in a suburban community are willing to travel to reach a community park. As a comparison, the study should also analyze the distances from other similar existing City of Santa Ana residential neighborhoods to their nearest community parks.
5. **District Center Land Use - 55 Freeway/Dyer Road Focus Area** – The PowerPoint presentation for the General Plan Land Use Community Workshop for the 55 Freeway/Dyer Road Focus Area held on April 29, 2019, identified two (2) project alternatives which offer varying levels of increased commercial and residential intensities. Stated goals for the Focus Area include, but are not limited to the following: 1. Protect industrial and office



employment base, 2. Provide complementary housing at the City's edge, and 3. Maintain hotel and commercial uses.

According to Table 1 of the NOP, the development of an additional 8,731 housing units is proposed within the Focus Area. Currently the District Center Land Use Designation allows for up to 90 dwelling units per acre as a maximum residential density. Alternative 1 considers only the addition of the Bowery project located at 2300 Red Hill Avenue which proposes 1,150 dwelling units. Alternative 2 proposes an increased area for residential mixed-use development of what appears to be approximately 53 acres overall. If developed at the maximum residential density allowed (90 du/ac.) this area would yield approximately 4,770 dwelling units.

It is unclear where the additional housing units noted within Table 1 would be located. The level of development noted in Table 1 does not appear to align with the vision represented to the public in the two (2) development alternatives. This appears to run contrary to the Focus Area goal of protecting the industrial and office employment base by eroding commercially used properties.

An accurate representation of the vision for the area should be provided to the public along with the technical analysis to justify that the development potential can be accommodated. A residential unit cap may be needed similar to that of the Irvine Business Complex in the City of Irvine to ensure adherence with the General Plan vision and goals.

6. **Affordable Housing** – There is no mention in the NOP of affordable housing to be provided in conjunction with the proposed upzoning of properties. The lack of affordable housing within Santa Ana was noted as a concern to residents in the Community Outreach – The First Conversation Executive Summary. Potential density bonus units should be identified and evaluated for their impacts when evaluating buildout capacity.
7. **Land Use Compatibility** – The General Plan proposes to introduce residential uses into what is predominately an office and industrial business park area. This has already occurred in a piecemeal approach with the Heritage Project located at 2001 E. Dyer Road. The GPPF from December 2018 identifies Land Use Policy 1.1 Compatible Uses. The General Plan Update should identify how these land uses such as industrial and residential will co-exist directly adjacent to one another. Facility improvements required to “enhance livability and promote healthy lifestyles” should be identified and a course of action for implementation provided. As an example, a significant portion of the area does not have sidewalks which presents a mobility issue for future residents.
8. **Noise** - The 55 Freeway/Dyer Road Focus Area lies within the John Wayne Airport (JWA) flightpath, with a substantial portion of the area included within the 65 dB(A) and 60 dB(A) CNEL contours (2016 Baseline). Policy 3.1 of the Noise Element from the GPPF does not support residential development within the 65 dB(A) CNEL noise contour. Areas falling within the 65 dB(A) CNEL noise contour should be clearly identified in the PEIR and restricted so as not to allow residential development.

- Policy 2.2 – Stationary Related Noise of the Noise Element from the GPPF seeks to minimize noise impacts from commercial and industrial facilities adjacent to residential uses. Mitigation measures will need to be identified as to how this goal will be achieved with the introduction of residential uses in the Focus Area which currently consists of predominately office and industrial uses.
9. **Traffic/Circulation** - Due to land use changes contemplated in Santa Ana’s proposed General Plan, a Traffic Impact Analysis (TIA) is required. The Study Area should include Tustin arterial roadways within the area between Barranca Parkway/Dyer Road and the I-5 Freeway and between the SR-55 Freeway and Jamboree Road. The greatest potential impacts are anticipated to occur along Red Hill Avenue, Warner Avenue, and Barranca Parkway. The intersections of Tustin Ranch Road-Von Karman Avenue/Barranca Parkway and Red Hill Avenue/Warner Avenue are especially sensitive to additional impacts, as they are already expected to operate at capacity at Long-Term Buildout. The Red Hill Avenue /I-5 Ramp intersections along with the adjacent intersections at Nissan Road and El Camino Real should also be included.
  10. **Traffic/Circulation** - The newly installed landscaped median on Red Hill Avenue between Warner Avenue and Carnegie Avenue currently prevents left turn ingress and egress at driveways along the westerly side of Red Hill Avenue along the frontage of contemplated development. Due to the high speeds and traffic volume on Red Hill Avenue, the City is not supportive of an additional traffic signal to serve proposed development, nor the installation of median breaks to provide turning movements across the median. Any driveways on Red Hill Avenue to serve proposed development will need to only allow right-turn in and right-turn out movements.
  11. **Traffic/Circulation** - Any significant development or land use intensification in the 55 Freeway/Dyer Road Focus Area would likely require improvements along southbound Red Hill Avenue i.e., dedicated right-turn lanes on eastbound Warner Avenue and Carnegie Avenue at Red Hill Avenue or right-turn lanes on southbound Red Hill Avenue at Warner Avenue and Carnegie Avenue.
  12. **Traffic/Circulation** - Any analysis of Tustin roadways and intersections would need to comply with the most current City of Tustin methodology for such analyses. The traffic analysis should consider cumulative traffic impacts, and all traffic impacts should be mitigated to the greatest extent feasible through the imposition of effective mitigation measures on the project.
  13. **Traffic/Circulation** - Due to this project’s proximity with the City of Tustin and its potential to significantly impact Tustin roadways, it is requested that an opportunity be extended to Tustin staff to participate in the development of the TIA for the project, and to review the TIA before public release.

Thank you again for the opportunity to provide comments on the proposed City of Santa Ana General Plan project. The City of Tustin would appreciate receiving early responses to our comments as well as a copy of the Draft EIR when it becomes available and all future public hearing notices with respect to this project.

Mr. Verny Carvajal  
Santa Ana General Plan NOP  
March 26, 2020  
Page 6

Please provide all future CEQA notices regarding this project to the undersigned pursuant to Public Resources Code Section 21092.2.

If you have any questions regarding the City's comments, please call Scott Reekstin, Principal Planner, at (714) 573-3016 or Krys Saldivar, Public Works Manager, at (714) 573-3172.

Sincerely,



Elizabeth A. Binsack  
Community Development Director

cc: Minh Thai, Executive Director, Santa Ana Planning and Building Agency  
Phil Johnson, Fire Chief, Orange County Fire Authority  
Matthew S. West, City Manager  
Nicole Bernard, Assistant City Manager  
David Kendig, City Attorney  
Stu Greenberg, Police Chief  
Jason Al-Imam, Director of Finance  
Chris Koster, Director of Economic Development  
Douglas S. Stack, Public Works Director  
Chad Clanton, Parks and Recreation Director  
Ken Nishikawa, Deputy Director of Public Works/Engineering  
Justina Willkom, Assistant Director – Planning  
Kris Saldivar, Public Works Manager  
Scott Reekstin, Principal Planner  
Ryan Swiontek, Senior Management Analyst

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ADMINISTRATION  
(714) 744-7240  
fax: (714) 744-7222

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(714) 744-7220  
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BUILDING DIVISION  
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CODE ENFORCEMENT DIVISION  
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March 26, 2020

#01-20

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

via email: [VCarvajal@santa-ana.org](mailto:VCarvajal@santa-ana.org)

**Subject: Notice of Preparation (NOP) for Santa Ana General Plan Program  
Environmental Impact Report**

Dear Mr. Carvajal:

Thank you for the opportunity to review and comment on the NOP of a Program Environmental Impact Report (PEIR) for the City of Santa Ana General Plan. The project is a comprehensive update to the City of Santa Ana General Plan. It is our understanding that much of the update will focus on incorporating focused growth areas into the City of Santa Ana General Plan update. For the NOP, details other than proposed General Plan Land Use designations and projected buildout numbers do not appear to be available for review and comment.

Due to the growth areas' proximity to the City of Orange, the City has an interest in ensuring that the Draft PEIR addresses potential adverse impacts to Orange residents and infrastructure. We would appreciate the opportunity to consult on the technical studies, particularly for potential noise and transportation impacts.

We appreciate the opportunity to comment and we look forward to reviewing the Draft PEIR upon completion. If you have any questions, please feel free to contact me, at (714) 744-7237 or at [cortlieb@cityoforange.org](mailto:cortlieb@cityoforange.org).

Sincerely,



Chad Ortlieb  
Senior Planner  
City of Orange

cc: Rick Otto, City Manager  
William Crouch, Community Development Director  
Chris Cash, Public Works Director  
Larry Tay, City Traffic Engineer





*AFFILIATED AGENCIES*

*Orange County  
Transit District*

*Local Transportation  
Authority*

*Service Authority for  
Freeway Emergencies*

*Consolidated Transportation  
Service Agency*

*Congestion Management  
Agency*

March 26, 2020

Mr. Verny Carvajal  
Principal Planner  
City of Santa Ana Planning and Building Agency  
PO BOX 1988 (M-20)  
Santa Ana, CA 92702

**Subject: Notice of Preparation and Scoping Meeting for the Santa Ana  
General Plan Program Environmental Impact Report**

Dear Mr. Carvajal:

Thank you for providing the Orange County Transportation Authority (OCTA) with a copy of the Notice of Preparation and Scoping Meeting for the Santa Ana General Plan Program Environmental Impact Report. The following comments are provided for your consideration:

- Thank you for keeping OCTA apprised of the Santa Ana's "Golden City Beyond: A Shared Vision" General Plan. Please continue to coordinate with OCTA to maintain consistency between the Circulation Element and the Orange County Master Plan of Arterial Highways.
- Please note that First Street, Irvine Boulevard, Harbor Boulevard, Edinger Avenue, and Warner Avenue are part of the Congestion Management Program Highway System and should be analyzed as such for any potential traffic impacts.

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at [dphu@octa.net](mailto:dphu@octa.net).

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Phu", is written over a horizontal line.

Dan Phu  
Manager, Environmental Programs



SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
T: (213) 236-1800  
www.scag.ca.gov

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Human Development  
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Linda Parks, Ventura County
- Transportation  
Cheryl Viegas-Walker, El Centro

March 27, 2020

Mr. Verry Carvajal, Principal Planner  
City of Santa Ana Planning and Building Agency  
P.O. Box 1988 (M-20)  
Santa Ana, California 92701  
E-mail: VCarvajal@santa-ana.org

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Santa Ana General Plan [SCAG NO. IGR10139]**

Dear Mr. Carvajal,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Santa Ana General Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Santa Ana General Plan in Orange County. The proposed project includes a General Plan update to identify areas of opportunity, provide options to enhance development potential, and bring the City into compliance with recent state laws, totaling roughly 17,280 acres.

**When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to [au@scag.ca.gov](mailto:au@scag.ca.gov) providing, at a minimum, the full public comment period for review.**

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or [au@scag.ca.gov](mailto:au@scag.ca.gov). Thank you.

Sincerely,

Ping Chang  
Manager, Compliance and Performance Monitoring

<sup>1</sup> Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.



**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
SANTA ANA GENERAL PLAN [SCAG NO. IGR10139]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the RTP/SCS.

Please note the Draft 2020 RTP/SCS (Connect SoCal) was released for public review on November 14, 2019 until January 24, 2019. The Final Connect SoCal is anticipated to be adopted in April 2020. Please refer to Connect SoCal goals and growth forecast for RTP/SCS consistency for future projects. The Draft Connect SoCal can be reviewed here: <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>.

**2016 RTP/SCS GOALS**

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

<b>SCAG 2016 RTP/SCS GOALS</b>	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
<small>*SCAG does not yet have an agreed-upon security performance measure.</small>	

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

**2016 RTP/SCS STRATEGIES**

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

**DEMOGRAPHICS AND GROWTH FORECASTS**

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Santa Ana Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	340,600	343,400	343,100
Households	6,458,000	7,325,000	7,412,300	76,600	77,700	78,000
Employment	8,414,000	9,441,000	9,871,500	160,600	165,200	166,000

**MITIGATION MEASURES**

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG’s Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

**Serving:**

Anaheim  
Brea  
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Placentia  
Santa Ana  
Seal Beach  
Stanton  
Tustin  
Villa Park  
County of Orange  
Costa Mesa  
Sanitary District  
Midway City  
Sanitary District  
Irvine Ranch  
Water District  
Yorba Linda  
Water District

March 31, 2020

Verny Carvajal, Principal Planner  
City of Santa Ana Planning and Building Agency  
PO Box 1988 (M-20)  
Santa Ana, CA 92701

SUBJECT: Santa Ana NOP General Plan PEIR

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Thank you for the opportunity to review and comment on the subject matter. I would recommend that a sewer study be performed in the future to assure there is adequate sewer capacity.

I would like to bring to your attention that any new or modified connection to Orange County Sanitation District (OCSD) sewer lines will require your agency to coordinate with us and may require a permit. Your contact at OCSD will be Daniel Lee, Engineer, at (714)593-7176 or [dlee@ocsd.com](mailto:dlee@ocsd.com).

Thank you for the opportunity to provide input on the City's proposed NOP General Plan PEIR. If you have any questions, please contact Kevin Hadden at (714)593-7462 or [khadden@ocsd.com](mailto:khadden@ocsd.com).

  
Adam Nazaroff  
Engineering Supervisor







**From:** [Ginelle Hardy](#)  
**To:** [Macedonio, Margarita](#)  
**Cc:** [Carvajal, Verny](#)  
**Subject:** General Plan EIR  
**Date:** Friday, March 06, 2020 11:48:20 AM

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Hello Margarita,

Public review is closing March 27, 2020 for public comments pertaining to the General Plan's EIR. South Main Street is Focus Area #1 potentially affecting Heninger Park properties and residential homes on S. Sycamore (that back up to S. Main St.). It looks like the focus area includes S. Broadway in Heninger Park also!

The March 18th Heninger Park neighborhood meeting would be a timely opportunity to present the General Plan and EIR - as it relates to South Main from 1st Street to W.

McFadden, S Sycamore & S. Broadway. Principal Planner, Verny Carvajal may have ideas about how to disperse this information @ our March meeting. Also he may be able to provide printed "Notice of Preparation Review Period" informative flyer, condition growth buildout table 1 and land use & focus area maps.

I will copy Verny this email so he will know my interest in a General Plan & related EIR presentation @ Heninger Park's March 18th neighborhood meeting.

Thank you,

Ginelle Hardy

Heninger Park, President

[ginelleann@gmail.com](mailto:ginelleann@gmail.com)

**From:** [mjohnston@recupero.net](mailto:mjohnston@recupero.net)  
**To:** [New General Plan](#)  
**Subject:** New General Plan Approval  
**Date:** Tuesday, March 17, 2020 11:12:26 AM

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Hello,

I am reaching out to find out if you can share a rough estimate for when the General Plan may be reviewed and potentially approved by the City Council. I saw from the scoping meeting presentation on 3/5 that the draft EIR is expected to be circulated this summer. I am wondering if that means that the General plan will be adopted after the EIR is finalized, so sometime late Fall 2020? I'm just trying to gain a better understanding of timing and know that these things are dynamic. Any light you could shed on the timeline for the update would be greatly appreciated.

Thank you in advance,

Mike Johnston  
RECUPERO AND ASSOCIATES, INC.  
31877 Del Obispo St., Suite 204  
San Juan Capistrano, CA 92675  
(949) 429-6300

**From:** [Justin Esayian](#)  
**To:** [New General Plan](#)  
**Cc:** [Norm Scheel](#)  
**Subject:** General Plan Update Status  
**Date:** Wednesday, March 25, 2020 10:26:34 AM

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Hello,

I have a few questions/requests regarding the General Plan Update.

- 1) I wish to receive updates to the progress of the general plan update. Can you please add me to your communication group on emails that will be sent to the public regarding the progress of the GP update?
- 2) Also, can you please let me know when you expect to have the GP update finalized, given the current environment?
- 3) Did the public EIR scoping meeting occur on March 5<sup>th</sup>? If not, are there plans to reschedule this and if so, when would you expect this to occur?

Thank you!

Sincerely,

Justin A. Esayian  
Senior Vice President  
**The Hoffman Company**  
18881 Von Karman Avenue  
Suite 150  
Irvine, CA 92612  
(949) 705-0921 Direct  
(949) 553-8449 Fax

CA BRE #01513596  
NV DRE #S.0168908  
Corporate CA BRE #01473762  
[www.hoffmanland.com](http://www.hoffmanland.com)







March 27, 2020

## **RE: Public Comment on the Scope of the Environmental Impact Report for the Proposed General Plan**

The Rise Up Willowick Coalition (“the Coalition”) is comprised of residents from the City of Santa Ana, the City of Garden Grove, and neighboring Orange County Cities as well as local organizations whose goal is to ensure that the Willowick Golf Course property (“Willowick”) is developed in a way that reflects the local residents needs and vision -- especially the most vulnerable such as, but not limited to, working class individuals, youth, and immigrant residents -- which includes deep affordable housing and open-space use for parkland.

In the process of updating its General Plan, the City of Santa Ana (“the City”) proposes new growth and development for five focus areas, including the West Santa Ana Boulevard, which encompasses the Willowick Golf Course, a critical area of advocacy for the Coalition. **With any consideration for land development, it is imperative for the City of Santa Ana to understand and meet the needs of its current residents.**

As a coalition, we surveyed 324 residents of which 95% of respondents lived within a 1 mile-radius of the Willowick property, we hosted monthly community meetings, and we continue to engage our neighbors and fellow residents to shape our community vision for Willowick.

Based on this engagement<sup>1</sup>, our vision for the future of Willowick includes:

- Parks and open space that are safe, well resourced, and well maintained
- Deeply affordable housing that is accessible to very low-income families
- Well resourced community spaces

The community’s vision aligns with residents’ needs in the Santa Anita neighborhood. The median family income in the Santa Anita area is approximately \$46,000 a year, much lower than Orange County’s median income of \$92,700<sup>2</sup>. According to the HUD, the residents around the Willowick area are at an extremely to very low-income level. Furthermore, open space is scarce as it only constitutes 4% of the total land in Santa Ana and the investment on parks/open space the city makes is only \$47 per resident, while other cities in Orange County enjoy the vast amount of open space available to them<sup>3</sup>. For example, the City of Irvine dedicates approx 30% of land to parks and open space while investing approximately \$250 per resident<sup>4</sup>.

Given the urgent need for open space in the Santa Anita neighborhood and more broadly in the City of Santa Ana, the Coalition is concerned over the environmental impact of the proposed

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<sup>1</sup> Willowick: The Opportunity to Use Public Land for Public Good. 2019. <http://riseupwillowick.org/wp-content/uploads/2019/10/riseupwillowickreport.pdf>

<sup>2</sup> Ibid.

<sup>3</sup> Trust for Public Land Park Score. 2019. <https://www.tpl.org/city/santa-ana-california>

<sup>4</sup> Trust for Public Land Park Score. 2019. <https://www.tpl.org/city/irvine-california>



General Plan updates, especially in regards to open space. As we reviewed the notice provided by the City on the scope of the Environmental Impact Report (the “EIR”) for the proposed updated General Plan, we were troubled by the following: 1) the lack of assessment the City is proposing to do in its EIR on the impact of limited open space in the City and 2) the impact of incentivizing development in the five focus areas at the expense of what is already a limited supply of open space in the City as is the case with the inclusion of the entire Willowick site within the West Santa Ana Boulevard focus area. As stated on page 3 of the Notice<sup>5</sup>, the focus areas are seen by the City as “suited for new growth and development.” **Given that Willowick is the last remaining large-scale, open space site in the City of Santa Ana, it is one of the few viable opportunities to increase urgently needed parkland for residents, and thus, the impacts of depleting this resource need to be thoroughly analyzed by the EIR.**

## RECOMMENDATIONS

As the City works to complete the EIR for the proposed General Plan, the Coalition strongly urges it considers the following:

1. The City needs to ensure it is actively working to accomplish the Core Values proposed in the General Plan.
  - a. By supporting RUW’s vision, the City ensures it is implementing the General Plan’s values of health, equity, sustainability, culture, and education given that improving park accessibility improves the overall health of residents by promoting a healthy lifestyle, increases access to a critically needed resource, improves students' academic performance, and invests land use decisions that will benefit many future generations.
  - b. The City must intentionally include residents in development processes and must work with the City of Garden Grove to ensure it negotiates in good faith with nonprofit affordable housing and open space developers in order to achieve the community’s vision of open space and affordable housing on the Willowick site.
2. The City needs to go above and beyond what the state law requires under CEQA and include an additional the environmental impact category of Open-Space and Parkland as one of its impacted areas of study that the EIR needs to thoroughly assess.
  - a. Since this would be a new category, in its EIR, the City must define in detail how it is conducting this analysis.
  - b. Any future EIR prepared for development projects in the City, especially a project within the West Santa Ana Boulevard, should include the environmental impact category of Open-Space and Parkland as one of its impacted areas of study.

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<sup>5</sup> City of Santa Ana Notice of Preparation and Scoping Meeting. 2020.  
[https://www.santa-ana.org/sites/default/files/pb/general-plan/documents/Final%20NOP\\_Final.pdf](https://www.santa-ana.org/sites/default/files/pb/general-plan/documents/Final%20NOP_Final.pdf)



- c. The City should work with residents to ensure this impact category is properly analyzed.

We are available to further discuss our recommendations and are available to meet with City representatives to ensure that the current residents' needs and visions are met and reflected in the EIR for the General Plan and the General Plan. Please contact us at [cguerra@riseupwillowick.org](mailto:cguerra@riseupwillowick.org) with comments or questions.

March 27, 2020

Verny Carvajal, Principal Planner  
City of Santa Ana Planning and Building Agency  
PO BOX 1988 (M-20) Santa Ana, CA 92702  
Email: VCarvajal@santa-ana.org

RE: Environmental Impact Report

Dear Mr. Carvajal:

We submit these comments regarding the City's work on an EIR for the City of Santa Ana's General Plan, and we write to ask that the City ensure that the projects that the City has approved and will seek to approve, not detrimentally affect the environment. We also request that the City ensure that the projects that it approves will affirmatively further fair housing and land use opportunities, as required by state law<sup>1</sup>, for its most vulnerable residents.

The need to protect low-income residents in Santa Ana comes at a critical time. As the nation heals from one of the worst public health crises in human memory, the need to provide healthy spaces for Santa Ana residents and their families to thrive is critical. As attorneys and advocates who have helped low-income Santa Ana residents obtain access to the courts, we at the Public Law Center, collaborate with other organizations for sensible strategies to end poverty in Orange County. We also collaborate with stakeholders to create and maintain effective housing policies for lower-income working families. Because we practice in a jurisdiction that lacks local rent control laws, we implore cities, such as the City of Santa Ana, to develop environmental plans that will consider the needs of the City's most vulnerable residents.

In this regard, given the City's large size of 330,000 persons, of about which 60% are renters, we ask of the City to ensure that the environmental projects that it puts forward meet its core values and contribute to the need for cultural pride, good health, and equity and sustainability in land use development. It is our experience that there exists a great need for the City to continue to produce housing for those who have very-low and extremely-low incomes. According to the U.S. Census Bureau's 2013-2017 American Community Survey 5-Year Estimates, residents in the City of Santa Ana have a median household income of just over \$57,151, compared to a median income of more than \$81,151 for Orange County. According to the May 2017 report by the California Housing Partnership Corporation, median rent in Orange County, which includes the City of Santa Ana, has increased 24% since 2000, while median renter household income has declined by 10%, when adjusted for inflation. Additionally, renters need to earn approximately 3.7 times the state minimum wage to afford base median rent of \$2,261 for a two-bedroom

<sup>1</sup> Gov. Code section 8899.50; Gov. Code section 65583, *et seq.*

apartment in Santa Ana. Moreover, according to a recent California Housing Partnership Study, Orange County's lowest-income renters spend 84% of their income on rent, leaving very little to meet other basic human needs such as food and health. Furthermore, in the academic year of 2019, there were approximately 51,482 students in the Santa Ana Unified School District. Of this number, the Santa Ana Unified School District reported enrollment numbers of approximately 46,597 students. Of this number, 40,925 students—87.8%, are economically disadvantaged. Additionally, 5,995 students, or 12.9%, identified as homeless. Moreover, in 2019, 41,115 of the Santa Ana Unified School District's 51,482 students, or 80% were eligible for a free or reduced-cost lunch. Evictions and displacement impose an especially high burden on school-aged children and their families, including increased absences from school and other educational disruption that can have long-lasting effects, such as impacts on mental and physical health, as well as school and social hardships for the affected children and their families. Because of the devastating impacts brought upon by lack of affordable housing opportunities, we ask that the City act in the best interests of its residents to provide clear guidance and direction for its EIR and ensure that it will protect its most vulnerable residents.

Sincerely,

/s/ Ugochi Anaebere-Nicholson

Directing Attorney, Housing and Homelessness Prevention Unit

## Dina El Chammas

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**Subject:** FW: Santa Ana General Plan Update - NOP Question

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**From:** Oscar Uranga [<mailto:oscar@img-cm.com>]

**Sent:** Tuesday, April 07, 2020 7:20 AM

**To:** Carvajal, Verny <[VCarvajal@santa-ana.org](mailto:VCarvajal@santa-ana.org)>

**Cc:** [ejzuziak@jzmkpartners.com](mailto:ejzuziak@jzmkpartners.com)

**Subject:** Santa Ana General Plan Update - NOP Question

Hey Verny,

What are the proposed changes to the Urban Neighborhood land use designation (highlighted below)?

### **GP Update NOP - Project Buildout**

In coordination with the 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**. Industrial Flex would be introduced where Industrial land use designations currently exist within each of the five focus areas in order to allow for cleaner industrial and commercial uses with live-work opportunities.

Thanks,



**Oscar Uranga, PMP**

Principal

IMG Construction Management

19782 Macarthur Blvd, Suite 300 | Irvine, CA 92612

C: 949.933.4103 | [Oscar@img-cm.com](mailto:Oscar@img-cm.com)

**From:** [Pat Coleman](#)  
**To:** [New General Plan](#)  
**Subject:** General Plan Scoping  
**Date:** Friday, March 27, 2020 5:00:38 PM

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Regarding the Scope of the EIR for the City of Santa Ana General Plan Update:

Please include some of the older City parks when assessing for Historical Significance.

For example, Santiago Park (Santa Ana's fourth park) was built in 1936 as a WPA project. Florence Yoch, daughter of Joseph Yoch of Santa Ana, designed the original layout for Santiago Park. She was a well-known Pasadena landscape architect, having designed movie sets for the 1930's *Gone With the Wind* and *Romeo and Juliet* as well as many estates in Carmel and Pasadena for Hollywood figures such as Jack Warner and David Selznik. The original design and hardscape of these early parks are worth preserving whenever possible.

Please add Access Management to Level of Service evaluations for Road Design and Modifications

Currently, the City is using Level of Service (LOS) to evaluate road modifications, but when used by itself, this parameter does not adequately cover safety, especially pedestrian safety. The inclusion of an Access Management evaluation considers pedestrian traffic as well as efficiency of flow and would bring Santa Ana in line with recommendations from the NTSB.

Please consider including recommendations and requirements of the Seismic Hazard Mapping Act of 1990 (Public Resources Code, Chapter 7.8, Section 2690-2699.6) and the Special Publication 117A into the Safety Element

Currently, the City of Santa Ana's approach to evaluating seismic safety for new developments is uneven, at best, even though much of Santa Ana is within a Seismic Hazard Liquefaction Zone. For some projects, seismic safety is addressed in the EIR, for others, it is not addressed until the permitting process. The Seismic Hazard Mapping Act (SHMA) does not require that the investigation occur during the CEQA process, but its guiding Special Publication (SP 117A) notes that:

"Some of the potential mitigation measures described herein (e.g., strengthening of foundations) will have little or no adverse impact on the environment. However, other mitigation measures (e.g., draining of subsurface water, driving of piles, densification, extensive grading, or removal of liquefiable material) may have significant impacts. If the CEQA process is completed prior to the site-specific investigation, it may be desirable to discuss a broad range of potential mitigation measures (any that might be proposed as part of the project) and related impacts. If, however, part or all of the site-specific investigation is conducted prior to completion of the CEQA process, it may be possible to narrow the discussion of mitigation alternatives to only those that would provide reasonable protection of the public safety given site-specific conditions." (SP 117A, pg. 6)

Please consider including a Geology section in all CEQA studies for projects within the liquefaction zone. Saving the study for the permitting process keeps mitigation measures of significant impact out of public view. This goes against the City's guiding principle of transparency and may lead to significant impacts unaccounted for when weighing a project. For example, in a current project, no Geology section was included, however the Geological Report's recommendations for dealing with unstable topsoil was to remove 5 feet out and 5 feet down from the foundation and recompact the unstable fill (requiring the removal and recompacting of a calculated 33,476 cubic yards of soil – no small environmental impact).

The SHMA also requires that the certified geological study and its professional certified review (usually done by the City) be submitted to the appropriate state agency. This again creates a



reviewable public record and allows all the professional involved to own their professional recommendations.

We have good science and guidelines for minimizing seismic hazards, let's use and comply with all of them.

**From:** [Lisa Ganz](#)  
**To:** [Carvajal, Verny](#)  
**Subject:** Public Comments: Santa Ana General Plan  
**Date:** Monday, March 16, 2020 12:45:36 PM

---

Please include the following comment/questions in the public record on the NOP for the Santa Ana General Plan Program.

Santa Ana is the most dense city in OC and the second dense in the state. Santa Ana City Planning documents consistently make the statement the "the city is nearly built out." SCAG reports that So Cal has the worst congestion in the country for the last 2 decades.

Adding more high density housing projects to the General Plan is just plain irresponsible. The NOP document seems to primarily focus on Land Use, while the "Shared Vision" Plan should instead focus on quality of life initiatives that will improve the city through 2045: More open/park space, less congestion, quality services. The 2014-21 Housing Element should absolutely be a part of this analysis and the Mandatory Topics should be looked at in its entirety, not piece-mealed. A THOROUGH EIR should be conducted - and not be determined on the "degree of specificity involved." The Main Place Mall Renovation is a perfect example of when things go wrong. That project should have had an updated EIR and should not have been approved based on a 20 year old EIR document.

I strongly oppose the plan to turn Grand and 17th into an Urban Neighborhood. This area is congested already. Keep the zoning and incentivize new retail. The 55/Dyer development will add more congestion to the already crowded 55 FWY.

Santa Ana needs a better vision for the city. Better streets/timed lights. More open space. Good retail that makes people want to visit. Reasonable housing in the right space - single family that fit the uniqueness of our historic neighborhoods.

Please consider this.

Thank you,  
Lisa Ganz resident of Santa Ana

General Plan Update - EIR Scoping Meeting - March 5, 2020



First Name	Last Name	E-Mail Address	Street Address	Zip Code	Primary Telephone #	Neighborhood Association or Organization	Contact with Project Updates?
FRANK	LOPEZ					PARK SANTIAGO	
PETER	KATZ					MARLES	
JOE	ANDRADE					Logan	
SAM	ROMERO					LOGAN	
GIVELLE	HARDY					HENNINGER PARK	✓
DALE	HELVIG					PSNA	X
Irma	Sauregui					SSAMA/Wilshire	
Nylda	Anaya					Monte Carlo Square	
Patricia	Coleman					Park Santiago	✓
BRIAN	Diaz					N/A	✓
Tay	Aston					Maybury	
Ashley	CHASTY					ASHLEY ADAMS	
Soledad	Valentin						
Diane	Franklin					Park Santiago	✓
Corey	Hayes					Memorial pk	
CHAD	ORTUEB						✓
CHRIS	SCHMIDT					WINDSOIL VILLAGES	
TOM	MORRISSEY						
JEFF	KATE					FLORAL PARK	✓
Maria	Kelany					"	✓
TRESA	OLIVERI						
Gaby	Hernandez						✓
Roy	Russell					Washington Square	
Barbara	Russell					Fisher Park	✓
Pedro	ARANDA						
Catalina	Lopez						
Maura	Lopez						
Obdulia	Flores						





COMMENT CARD  
Santa Ana General Plan Update EIR  
Public Scoping Meeting

March 5, 2020, 6:00 PM

+ green house  
1900s

Please let us know your comments/concerns regarding the Santa Ana General Plan Update EIR (please print):

UN designation for the Medical Arts property is a very constricted parcel w/ the Western boundary being RR tracks.

Also, there is a proposal to do a grade separation for the RR crossing @ 17th & Lincoln - this will greatly restrict access from the Medical Arts property into 17th St.

The proposed UN designation will add way too much traffic, NOISE, Air Quality issues to an already very congested 17th St + Grand

You need to include a major park/openspace component for this UN designation

Last summer we attended a Gen Plan update meeting & took a survey for the Medical Arts property & the majority didn't want to see MORE High Density at this location - apparently it doesn't matter what the neighbors want because you show UN as the designation anyway. This will definitely impact the quality of the existing residents in a very negative way - Way too dense for an already dense area - there is not any additional infrastructure which exists today - Very unsustainable irresponsible!

Name: Dave Frankel  
Address: 2402 N. Oakmont 92704

Its all about  
a BALANCE

- 1) Please return this card to Verny Carvajal, Principal Planner for the City of Santa Ana, at the end of the Scoping Meeting, 2) Email your comments to [newgeneralplan@santa-ana.org](mailto:newgeneralplan@santa-ana.org) or 3) Mail this comment card by folding it in half, sealing with scotch tape, and adding a postal stamp.

\* The concern is that our existing infrastructure (Streets, sewer, water, storm drain) can't handle the proposed density in many of these areas - unless these projects are going to add New Roadways (& water/sewer/storm drain) its NOT sustainable as it exists today

Circulation Plan - how do the classifications work & are they changed based on the new designations? Are there physical changes to the roads based on the new designations & if so are they prepared/constructed prior to any commencement of construction for the new designated areas?

Fold here

Thank you!



Place  
Stamp  
Here

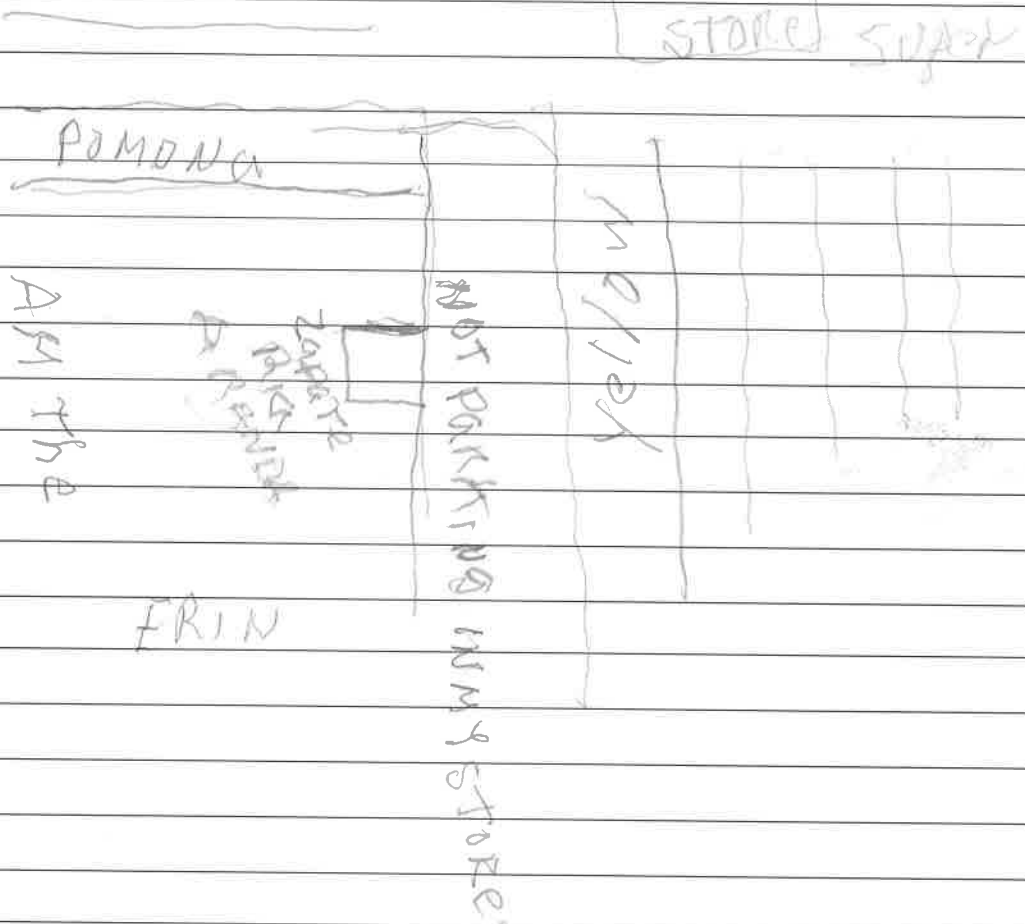
City of Santa Ana Planning and Building Agency  
Attn. Verna Carvajal, Principal Planner  
PO Box 1988, M-20  
Santa Ana, CA 92702



COMMENT CARD  
Santa Ana General Plan Update EIR  
Public Scoping Meeting

March 5, 2020, 6:00 PM

Please let us know your comments/concerns regarding the Santa Ana General Plan Update EIR (please print):



Name: Pedro ARANDA Zapateria ARANDA

Address: 1611 S MAIN ST Santa Ana Ca, 92707

my phone 714 973 1537-cell 714 856 0004

1) Please return this card to Verna Carvajal, Principal Planner for the City of Santa Ana, at the end of the Scoping Meeting, 2) Email your comments to [newgeneralplan@santa-ana.org](mailto:newgeneralplan@santa-ana.org) or 3) Mail this comment card by folding it in half, sealing with scotch tape, and adding a postal stamp.

GRACIAS PORSU ATT.



COMMENT CARD  
Santa Ana General Plan Update EIR  
Public Scoping Meeting

March 5, 2020, 6:00 PM

Please let us know your comments/concerns regarding the Santa Ana General Plan Update EIR (please print):

Increasing housing by 50% should also entail on site parking for each unit and keeping in mind that multiple drivers will be living in these spaces due to actual cost of these units. The current (2.4?) ~~max~~ requirement is extremely insufficient and will have a negative effect on the use and safety of surrounding neighborhoods.

Environmentally - it is inherent in planning that open space is increased. Adding all these multi-unit residences without providing the additional and necessary, open space is a concrete jungle in the making.

Define terms - i.e. District Center  
low - Med - etc residential  
? Environmental Justice

Name: Tay Aston taybird54@gmail.com  
Address: 1605 N. Linwood Ave. 92701

1) Please return this card to Verny Carvajal, Principal Planner for the City of Santa Ana, at the end of the Scoping Meeting, 2) Email your comments to [newgeneralplan@santa-ana.org](mailto:newgeneralplan@santa-ana.org) or 3) Mail this comment card by folding it in half, sealing with scotch tape, and adding a postal stamp.





TARJETA DE COMENTARIOS  
Reunión Informativa para Santa Ana General Plan Update EIR

5 de marzo de 2020, 6:00 PM

Por favor háganos saber sus comentarios/inquietudes con respecto al Santa Ana General Plan Update EIR (favor de escriba en letra de molde):

Me gustaría que en la calle 1ª y Standard es en la esquina un lugar de carros que ya no están trabajando los movieran para otro lugar adecuado para ellos o los dueños y que las calles principales estén siempre limpias.

Que los negocios limpien afuera que mantengan limpio.

Y que cuando hagan construcción de edificios que se enfoquen en las tuberías de agua, luz y Gas que todo sea nuevo.

Nombre: Soledad Valentin

Dirección: 1030 S Minnie Apt. 3 Santa Ana Ca, 9270

1) Por favor devuelva esta tarjeta a Verny Carvajal, Planificador Principal de la ciudad de Santa Ana, al final de la reunión informativa, 2) Envíe sus comentarios por correo electrónico a [newgeneralplan@santa-ana.org](mailto:newgeneralplan@santa-ana.org) o 3) Envíe esta tarjeta de comentario al doblar por la mitad, sellar con cinta adhesiva, y añadir con sello postal.

**From:** [Diane Fradkin](#)  
**To:** [Carvajal, Verny](#)  
**Cc:** [Ridge, Kristine](#); [Thai, Minh](#)  
**Subject:** Santa Ana General Plan Update - NOP mtg on March 5th  
**Date:** Friday, March 06, 2020 8:21:04 PM

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Hi Verny:

Nice meeting you on Thursday evening as well as your EIR consultant Joanne.

I wanted to discuss the proposed use for the Grand and 17th Street area. When we attended the focus study last year (spring/summer 2019), there was a survey which was performed with real time results. The proposed use of Urban Neighborhood was met by the audience as too much for the area. The survey results were that the general public (neighbors of the area) at that meeting overwhelmingly rejected this use for the Grand and 17th Street location. Again, this survey had real time results.

I understand that you did other surveys and had an advisory committee, but given my recent experience of door knocking over the entire City of Santa Ana to gather signatures for the 2525 N. Main St. Referendum, the feedback from a majority of Santa Ana residents is that they DO NOT want more high density residential. They believe that the overcrowding will cause more stress to an already over stressed and older infrastructure of our City. **The message is that the residents of Santa Ana want "responsible development".**

The City Planning Department continues to want to increase density throughout our already dense City. The City is right in wanting to improve areas which need revitalization, but the focus needs to be more on businesses and jobs.....we are already overcrowded with density!

I would encourage you to provide several alternatives to study in the EIR for the Grand and 17th Street section.....there needs to be alternatives with more SFR and town homes and low rise garden style apartments with a well thought out park component including a dog park and appropriate retail and office. Another alternative could secure a Costco with gas sales for a portion of the property, office and appropriate residential.....again SFR, townhomes and low rise garden style multi-family along with a "Grand City" park component.

Because the Medical Arts property currently houses many medical offices, it would be best to include this use in your General Plan Update for the Grand & 17th section so that these medical services can stay at this location to service this portion of the City.

Another item to consider in the incorporation of the land use and design for the area is the proposed grade separation at 17th and Lincoln for the RR tracks. This will likely inhibit access along 17th Street focusing more access along Grand Ave. This needs to be incorporated in the EIR.

I provide these comments to hopefully make our City and its future a better place.

Respectfully Submitted,

Diane Fradkin  
Park Santiago  
714-914-8047

**From:** [John Fradkin](#)  
**To:** [New General Plan](#)  
**Cc:** [Thai, Minh](#); [Ridge, Kristine](#); [Diane Fradkin](#)  
**Subject:** Comments on New General Plan  
**Date:** Friday, March 06, 2020 10:32:24 AM

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I attended the Public Scoping Meeting last night and have these comments:

1. The City of Santa Ana is still placing too much emphasis on adding to the city's housing stock. The state of California needs more housing but perhaps Santa Ana does not. Our city is already almost completely built out and we are already one of the densest cities in the nation. If we continue to build high density housing we will decrease the quality of life for existing residents. Nice neighborhoods will become less nice as wealthier residents leave. Do we really want that ? This is the cornerstone underlying clash between the viewpoint of current residents and the City of Santa Ana Planning Department's view and vision for the future of Santa Ana. Current residents want more businesses, more local jobs, and more parks and open space. They don't want more housing and more people living in Santa Ana.
2. There is a huge seismic shift going on in the automotive industry and the majority of cars in the future are going to be powered by electricity. Electric vehicles do not produce greenhouse gasses. The EIR for the general plan, which is supposed to cover a 25 year period, should take this into account because so much of the past thinking has been aimed at reducing greenhouse gasses by building high density housing next to transportation nodes in order to reduce greenhouse gasses by getting people to use public transportation and reducing automotive trips. This Transit Oriented Development is perhaps an older way of thinking that is less relevant going forward in a world of electric vehicles that do not produce greenhouse gasses.
3. Definitions of relevant zoning terms like Urban Neighborhood and MR-15 need to be decided upon early in the process in order for comments and studies to be accurate and useful.
4. In the "Urban Neighborhood" mixed use zoned areas the mixed use should be done on a horizontal basis and not on a vertical basis. Vertical mixed use buildings, where you have commercial on the bottom and residential on the top, have proven to be relatively unsuccessful as they are both hard to finance and hard to find tenants for the commercial spaces. Large companies as a rule will not lease those spaces as they do not like residents living above their businesses for insurance reasons as there is too much potential liability. This limits potential tenants to mom and pop small businesses and my sources have told me that many newly constructed buildings of this type are having trouble.

Regards,

John Fradkin  
Santa Ana resident  
714-915-8047

**From:** [Lisa Ganz](#)  
**To:** [Carvajal, Verny](#)  
**Subject:** Santa Ana General Plan update  
**Date:** Friday, March 06, 2020 3:32:31 PM

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Good afternoon- I was unable to attend the meeting last night. I have visited the website but dont see the report on what the City in considering to update. Can you please send me the link?

Thank you.

Lisa

**From:** [jessie Lopez](#)  
**To:** [Carvajal, Verna](#)  
**Subject:** General Plan Update  
**Date:** Friday, March 06, 2020 11:42:20 AM

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Hello,

Will the City host another meeting so that residents who couldn't make the last one can also attend?

Thanks,  
Jessie