

2. Introduction

This section has been supplemented since the original Draft Program Environmental Impact Report (PEIR) to:

- Describe the relationship of the Draft PEIR to the Recirculated Draft PEIR.
- Expand the discussion of public participation to include the Community Outreach program from January to May 2021.
- Update the conclusions regarding environmental impact significance of implementing the GPU.
- Refer to the environmental process and explain the documentation for the ultimate Final PEIR.

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

2.1.1 Draft Program Environmental Impact Report

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. The Draft PEIR was prepared to satisfy CEQA and the State CEQA Guidelines. The PEIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the General Plan Update (GPU), to indicate possible ways to reduce or avoid environmental damage, and to identify alternatives to the project. The PEIR must also disclose significant environmental impacts that cannot be avoided; growth-inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

Because approval of the proposed Santa Ana General Plan Update is a discretionary action by a public agency, the project is subject to the CEQA review process, and the City of Santa Ana, as the first public agency to act on the project, becomes the lead agency for the project. Pursuant to CEQA Section 21067, the lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.” As the CEQA lead agency, the City of Santa Ana has the principal responsibility for approval of the GPU; determining the method of CEQA compliance; preparing and certifying the PEIR that describes potential environmental impacts of the GPU; providing a Statement of Overriding Considerations for all environmental impacts that cannot be mitigated to a less than significant level; and adopting a Mitigation Monitoring Plan to ensure that all required mitigation measures are implemented during the course of the project.

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The Draft PEIR was prepared in accordance with requirements of the:

- California Environmental Quality Act of 1970, as amended (Public Resources Code Section 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (herein referenced as CEQA Guidelines), as amended (California Code of Regulations Sections 15000 et seq.)

The overall purpose of the Draft PEIR is to inform the lead agency, responsible agencies, decision makers, and the general public of the environmental effects of implementation of the General Plan update. The Draft PEIR addresses the potential environmental effects of the project, including effects that may be significant and adverse; evaluates a number of alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects. The intent of the Draft PEIR is to provide sufficient information on the potential environmental impacts of the General Plan update to allow the City of Santa Ana to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the City are described in Section 3.4, *Intended Uses of the EIR*.

2.1.2 Purpose of Draft Recirculated PEIR

This Draft Recirculated PEIR has been prepared in accordance with CEQA Guidelines Section 15088.5. Section 1.4, *Recirculated PEIR*, described the conditions requiring a Recirculated EIR, the reasons a Recirculated Draft PEIR has been prepared for the GPU, and the options for processing the Recirculated Draft PEIR.

2.2 NOTICE OF PREPARATION

The City of Santa Ana determined that a Program EIR would be required for this project and issued a Notice of Preparation (NOP) on February 26, 2020 (see Volume II, Appendix A-a), to the State Clearinghouse, responsible agencies, and interested parties. Comments received during the public review period, which extended from February 26, 2020, to March 27, 2020, are in Appendix A-a.

The NOP process helps determine the scope of the environmental issues to be addressed in the Draft PEIR. Based on this process, certain environmental categories were identified as having the potential to result in significant impacts. Issues considered Potentially Significant were addressed in Chapter 5, *Environmental Analysis*, of the Draft PEIR, but issues identified as Less Than Significant or No Impact were not. Refer to Chapter 8, *Impacts Found Not to Be Significant*, in the Draft PEIR for a discussion of how these initial determinations were made.

Ten agencies/interested parties responded to the NOP. The Draft PEIR took into consideration those responses. Table 2-1 summarizes the issues identified by the commenting agencies, along with a reference to the section(s) of the Draft PEIR where the issues are addressed.

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Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
Agencies				
<p>The Metropolitan Water District of Southern California (Metropolitan) Sean Carlson, Team Manager Environmental Planning Section; Jolene Ditmar, Assistant Environmental Specialist I</p>	3/16/20	<ul style="list-style-type: none"> ▪ Utilities and Services Systems 	<ul style="list-style-type: none"> ▪ Provides an introduction that outlines the project and Metropolitan’s service area and mission. ▪ States that it owns and operates the Orange County Feeder, East Orange County Feeder 2, and Santa Ana Cross Feeder pipelines in the plan area and provides information on these pipelines. ▪ Concerned about indirect effects to Metropolitan’s facilities. ▪ States that future development and land use conditions associated with the project must not restrict any of Metropolitan’s day-to-day operations, access, or repair of the facilities. States that Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities. ▪ Requires that any design plans for any activities in the area of Metropolitan’s pipelines or facilities be submitted for review and written approval. Metropolitan will not permit procedures that could subject the pipeline to excessive vehicle, impact, or vibration loads. ▪ Metropolitan attached a map with locations of its infrastructure and the “Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan’s Facilities and Rights-of-Way” 	<ul style="list-style-type: none"> ▪ Section 5.18, <i>Utilities and Service Systems</i> ▪ The enforcement of unobstructed access to Metropolitan’s facilities is outside the scope of this PEIR.
<p>South Coast Air Quality Management District (AQMD) Lijin Sun, J.D., Program Supervisor CEQA IGR</p>	3/17/20	<ul style="list-style-type: none"> ▪ Air Quality 	<ul style="list-style-type: none"> ▪ Requests that the Program EIR be submitted to the agency directly, including all appendices or technical documents and electronic versions of all air quality modeling and health risk assessment files. ▪ Recommends that the lead agency use the South Coast AQMD’s <i>CEQA Air Quality Handbook</i> for its air quality analysis and its more recent guidance. ▪ Recommends the use of CalEEMod land use emissions software. ▪ States that the most significant air quality challenge in the Basin is to achieve additional specified reductions in NOx emission. Provides a link to the 2016 Air Quality Management Plan. ▪ Recommends the review of the “Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning” when making local planning and land use decisions. ▪ Requests that the lead agency compare emissions to the recommended regional significance thresholds and recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). Recommends that the lead agency perform a localized analysis by either using the LSTs developed by South Coast AQMD or performing dispersion modeling as necessary. 	<ul style="list-style-type: none"> ▪ The Draft PEIR including technical appendices will be submitted to the South Coast AQMD. The agency will have a 45-day comment period to review the document. ▪ Section 5.2, <i>Air Quality</i> ▪ <i>Chapter 7, Alternatives</i>

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Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
			<ul style="list-style-type: none"> ▪ States that when specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the GPU, 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. Quantifying emissions should include both construction and operational activities and indirect sources. If the 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. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included. ▪ Recommends that the lead agency conduct a mobile source health risk assessment (HRA) in the Program EIR to disclose the potential health risks of sensitive receptors being exposed to toxic emissions within close proximity to freeways. ▪ Provides a list of four resources that are available when identifying possible mitigation measures. ▪ Discusses health risks reduction strategies particularly with respect to air filtration systems. ▪ States that the Program EIR shall include a discussion of alternatives and provide sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the GPU. ▪ States that if permits from South Coast AQMD are required, South Coast AQMD should be identified as a responsible agency. Provides a link to South Coast AQMD permits web page and contact information. ▪ Provides a brief discussion on data sources for AQMD rules and relevant air quality reports and data. 	<ul style="list-style-type: none"> ▪ A detailed mobile health risk assessment was not prepared because it is beyond the scope of this program EIR. Section 5.2, Air Quality, qualitatively discusses potential impacts of diesel particulate matter due to planned development. Also, individual projects would be required to undergo individual CEQA review, potentially including a detailed health risk assessment for air toxics.
<p>Gabrieleno Band of Mission Indians – Kizh Nation Andrew Salas, Chairperson; Brandy Salas, Admin Specialist</p>	3/20/20	<ul style="list-style-type: none"> ▪ Tribal Cultural Resources 	<ul style="list-style-type: none"> ▪ States the GPU location is within their ancestral tribal territory and requests a consultation with the lead agency to discuss the project and the surrounding location in further detail. 	<ul style="list-style-type: none"> ▪ Section 5.17, <i>Tribal Cultural Resources</i>
<p>Airport Land Use Commission (ALUC) Lea U. Choum, Executive Officer; Julie Fitch, Land Use Manager John Wayne Airport Orange County</p>	3/26/20	<ul style="list-style-type: none"> ▪ Building Heights ▪ Noise 	<ul style="list-style-type: none"> ▪ ALUC states that the City of Santa Ana is within the Airport Environs Land Use Plan (AELUP) notification area for John Wayne Airport (JWA). ▪ States that the EIR and General Plan update should address height restrictions and imaginary surfaces by discussing FAA Federal Aviation Regulation Part 77 as the criteria for determining height restrictions for projects within the airport planning area. The General Plan update should include height policy language and a mitigation measure in the EIR that states that no 	<ul style="list-style-type: none"> ▪ Section 5.8, <i>Hazards and Hazardous Materials</i> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.12, <i>Noise</i>

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			<p>building will be allowed to penetrate the Federal Aviation Regulation Part 77 imaginary surfaces for JWA.</p> <ul style="list-style-type: none"> ▪ States that structures more than 200 feet above ground level require filing with the FAA and ALUC notification and must comply with applicable procedures and regulations. ▪ Recommends that the City consider a mitigation and condition of approval specifying the 200 feet above ground level height threshold. ▪ States that portions of Santa Ana fall within the 60 to 65 dB CNEL noise contours for JWA, including a portion of the 55 Freeway/Dryer Road planning area. ▪ Recommends that the PEIR and General Plan update include policies and mitigations for development within the noise contours, especially if mixed-use or residential development would be permitted. ▪ States that all residential units within the 65 dB CNEL contour are typically inconsistent in the area unless it can be shown conclusively that such units are sufficiently sound attenuated. ▪ Recommends that residential uses are not permitted within the 65dB CNEL contour. Strongly recommends that residential units within the 60dB CNEL contour be limited or excluded. ▪ Recommends that the PEIR and General Plan update identify if the development of heliports will be allowed. Proposals for new heliports must be submitted to ALUC. ▪ Recommends adding specified language to the General Plan update and inclusion as mitigation measure in the EIR to address consistency with the AELUP for heliports. ▪ Recommends that the City include a policy in the General Plan update 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. ▪ Requests that referrals for determinations be submitted to the ALUC after the City's Planning Commission hearing and before the City Council action. 	
<p>California Department of Fish & Wildlife David Mayer, Acting Environmental Program Manager South Coast Region;</p>	<p>3/26/20</p>	<ul style="list-style-type: none"> ▪ Biological Resources 	<ul style="list-style-type: none"> ▪ Provides an introduction that describes its role as a trustee agency and provides a project description summary that describes special status species and species of special concern that have potential to occur. ▪ CDFW agrees that a Program Environmental Impact Report is appropriate for the project. 	<ul style="list-style-type: none"> ▪ Section 5.3, <i>Biological Resources</i>

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Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
Jessie Lane, Environmental Scientist			<ul style="list-style-type: none"> ▪ CDFW describes potential impacts to the Santa Ana River, and states that the focus area along West Santa Ana Boulevard intersects with the Santa Ana River corridor and adjacent open space areas. States that development within the focus area may have effects on riparian habitat and open space. ▪ CDFW provides recommendations to minimize significant impacts. Historically the Santa Ana River supported southern California steelhead. Recommends that the PEIR include an analysis of proposed major stream crossings in the context of fish passage. ▪ CDFW opposes any development or conversion that would reduce wetland acreage or wetland habitat value unless project mitigation ensures “no net loss” of either wetland habitat values or acreage. States that all wetlands and watercourses should be retained and provided with substantial setbacks. 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 the wildlife corridor. ▪ CDFW considers adverse impacts to a species protected by the California Endangered Species Act (CESA) to be significant without mitigation. CDFW recommends appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an incidental take permit. ▪ CDFW identifies mitigation for project-related biological impacts. CDFW states that the PEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. For proposed preservation and/or restoration, the PEIR should include measures to perpetually protect the targeted habitat values. ▪ CDFW requests that any special status species and natural communities detected during surveys are reported to the California Natural Diversity Database. CDFW further states that the project would necessitate an assessment of filing fees. 	
City of Tustin Elizabeth A. Binsack, Community Development Director; Scott Reekstin, Principal Planner; Krys Saldivar, Public Works Manager; Vera Tiscareno, Executive Assistant	3/26/20	<ul style="list-style-type: none"> ▪ Land Use and Planning ▪ Recreation ▪ Alternatives ▪ Public Services ▪ Population and Housing ▪ Noise ▪ Transportation 	<ul style="list-style-type: none"> ▪ Concerned with the significant changes in land use along Red Hill Avenue and Dyer Road, the Bowery project, or those that have occurred recently with the approval and construction of the Heritage project at 2001 E. Dyer Rd. States that this could result in significant and cumulative impacts to traffic and parks. ▪ States that the EIR should include detailed overall projections of the anticipated change to land uses. ▪ States that it is unclear how the development potential identified in Table 1 of the NOP was calculated. No technical analyses or supporting documentation was 	<ul style="list-style-type: none"> ▪ Chapter 3, <i>Project Description</i> ▪ Chapter 4, <i>Environmental Setting</i> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.12,

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			<p>provided in the NOP.</p> <ul style="list-style-type: none"> ▪ States that there will be capacity issues that need to be addressed in accommodating the proposed development. ▪ States that no project alternatives were identified in the NOP. Wants to know how the development potential in Table 1 of the NOP was concluded to be the preferred option. Requests that the PEIR identify project alternatives and provide the technical analyses that identify that the proposed development can be accommodated with the appropriate facilities and levels of service. ▪ States that there appears to have been no technical evaluation of the proposed General Plan update provided to the public. ▪ States that community outreach has identified parks and open space as an issue and the project alternatives presented through community outreach do not identify any open space within the 55 Freeway/Dyer Road Focus Area. Further states that it is unclear if the Santa Ana General Plan update would include additional parkland or open space and states that no additional open space is proposed in the 55 Freeway/Dyer Road Focus Area. States that the City of Santa Ana should require land for park and recreational purposes to meet the City's minimum standard. Further provides a discussion of parkland need in the focus area. ▪ States that the City of Santa Ana parkland goal falls short of the "widely held minimum standard" of three acres per 1,000 residents under the Quimby Act. Provides a table of parkland goals of other cities in Orange County. ▪ States that there is a fragmented and absent sidewalk network and no parkland facilities within the 55 Freeway/Dyer Road Focus Area, and further states that the 55 Freeway creates a barrier to those properties proposed for residential uses. ▪ States that Veterans Sports Park at Tustin Legacy will be three times larger and about half the distance from the 55 Freeway/Dyer Road Focus Area than the closest park in Santa Ana and will attract park goers. Requests that the analysis in the EIR should consider the quality, amenities, and attractiveness of nearby parks when estimating park usage. States that if sufficient parkland is not provided in Santa Ana, then it may negatively impact and overburden parkland facilities in Tustin, and impacts must be mitigated. Requests that analysis in the PEIR of proposed compliance with the City of Santa Ana park standards should focus on the potential to physically deteriorate 	<p>Noise</p> <ul style="list-style-type: none"> ▪ Section 5.13, <i>Population and Housing</i> ▪ Section 5.14, <i>Public Services</i> ▪ Section 5.15, <i>Recreation</i> ▪ Section 5.16, <i>Transportation</i> ▪ Section 5.18, <i>Utilities and Service Systems</i> ▪ Chapter 7, <i>Alternatives</i> ▪ Appendices ▪ The City is committed to working closely with cities located adjacent to General Plan Focus Areas when preparing the City of Santa Ana's Parks and Recreation Master Plan to ensure that the Dyer/55 Focus Area and other growth areas of the City provide additional recreation, parks, and core services essential in making complete communities. In addition, the City will identify additional

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Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
			<p>existing and future recreational facilities in the City of Tustin.</p> <ul style="list-style-type: none"> ▪ Concerned about the lack of commitment to open space and parkland given the 55 Freeway/Dyer Road Focus Area’s adjacency to the City of Tustin and Tustin Legacy. ▪ Requests that a comprehensive study of parkland demand be conducted to evaluate the impacts of the General Plan buildout on Tustin facilities. Recommends that the minimum park facilities be accommodated within the 55 Freeway/Dyer Road Focus Area, and that thresholds tied to development and upzoning should be required to ensure development of parkland facilities within the Focus Area. ▪ Requests that the PEIR include a study that analyzes how far residents in a suburban community are willing to travel to reach a community park and analyze the distance from other similar Santa Ana residential neighborhoods to their nearest community park as a comparison. ▪ Provides an overview of the 55 Freeway/Dyer Road Focus Area and two alternatives. States that it is unclear where the housing units noted in Table 1 for the 55 Freeway/Dyer Road Focus Area will be located and states that it appear to run contrary to the Focus Area goal of protecting the industrial and office employment base. Requests an accurate representation of the vision for the area along with technical analyses to justify that development can be accommodated. States that a residential unit cap may be needed similar to the Irvine Business Complex. ▪ States that the NOP did not mention affordable housing. Requests that potential density bonus units should be identified and evaluated for their impacts when evaluating buildout capacity. ▪ States that the General Plan update should identify how land uses such as residential and industrial will co-exist directly adjacent to one another. States that facilities improvements required to “enhance livability and promote healthy lifestyles” should be identified and a course of action provided for implementation. ▪ States that the 55 Freeway/Dyer Road Focus Area is within the John Wayne Airport flight path and 65 dBA and 60 dBA CNEL contours. States that areas falling within the 65 dBA CNEL noise contours should be clearly identified in the PEIR and restricted to not allow residential development. States that mitigation measures need to be identified that discuss how Policy 2.2, Stationary Related Noise, of the Noise Element from the General Plan Policy Framework will be achieved within the focus area. 	<p>funding sources from new development projects to procure land or in-lieu fees for installation of parks in the immediate vicinity of proposed development in order to minimize the potential for impacts on adjacent communities with regard to parks and open space utilization. The inclusion of publicly accessible open space is also part of the City of Santa Ana’s development standards for residential/ mixed use development projects to address open space and recreation needs.</p> <ul style="list-style-type: none"> ▪ Please refer to Section 3.3.2.5 of Chapter 3, <i>Project Description</i>, for a detailed discussion on density bonus. ▪ The Draft PEIR is based on VMT analysis per

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Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
			<ul style="list-style-type: none"> ▪ States that a Traffic Impact Analysis (TIA) is required. States that the TIA should include identified Tustin arterial roadways and intersections and identifies roadways and intersections that anticipate greatest impacts. ▪ States that the City of Tustin is not supportive of any additional traffic signals or median breaks on Red Hill Avenue. States that any development along Red Hill Avenue to serve future development will need to only allow right-turn in and right-turn out movements. ▪ States that any significant development or land use intensification in the 55 Freeway/Dyer Road Focus Area would likely require improvements along southbound Red Hill Avenue. ▪ States that any analysis of Tustin roads and intersections would need to comply with the most current City of Tustin methodology. States that analysis should consider cumulative traffic impacts and mitigation measures. ▪ Requests that the City of Tustin staff is given the opportunity to participate in the development of the TIA and review of the TIA prior to public release. ▪ Asks that all future CEQA notices be provided to the list of identified persons. 	<ul style="list-style-type: none"> the CEQA guidelines and City's adopted VMT thresholds. Intersection analysis is included in full the in Traffic Impact Study included as an appendix to the Draft PEIR. ▪ The Draft PEIR including technical appendices will be submitted to the provided list of contacts.
<p>City of Orange Chad Ortlieb, Senior Planner</p>	<p>3/26/20</p>	<ul style="list-style-type: none"> ▪ Infrastructure ▪ Noise 	<ul style="list-style-type: none"> ▪ States that the City of Orange has interest in ensuring that the Draft PEIR addresses potential adverse impacts to Orange residents and infrastructure. ▪ Would appreciate the opportunity to consult on technical studies, including potential noise and transportation impacts. 	<ul style="list-style-type: none"> ▪ The Draft PEIR including technical appendices will be submitted to the City of Orange planning department. The agency will have a 45-day comment period to review the document.
<p>Orange County Transportation Authority (OCTA) Dan Phu, Manager Environmental Programs; Hannah Allington, Planning Intern</p>	<p>3/26/20</p>	<ul style="list-style-type: none"> ▪ Transportation 	<ul style="list-style-type: none"> ▪ OCTA requests that the City coordinate with OCTA to maintain consistency between the Circulation Element and the Orange County Master Plan of Arterial Highways. ▪ States 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 potential traffic impacts. 	<ul style="list-style-type: none"> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.17, <i>Transportation</i>

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Southern California Association of Governments Anita Au, Associate Regional Planner Ping Chang, Manager Compliance and Performance Monitoring	3/27/20	<ul style="list-style-type: none"> ▪ Land Use and Planning ▪ Population and Housing 	<ul style="list-style-type: none"> ▪ SCAG provides an overview of its role in reviewing regionally significant projects pursuant to CEQA. SCAG states that it has reviewed the NOP and provides contact information to send the environmental documentation when ready. ▪ SCAG requests that the EIR provide a consistency analysis with the RTP/SCS, lists RTP/SCS goals, and provides a format for the consistency analysis. ▪ SCAG discusses demographics and growth forecasts and provides a table of these forecasts for the SCAG region and City of Santa Ana for the years 2020, 2035 and 2040. ▪ SCAG recommends the review of the Final Program EIR for the 2016 RTP/SCS for guidance on mitigation measures. 	<ul style="list-style-type: none"> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.13, <i>Population and Housing</i>
Orange County Sanitation District (OCSD) Adam Nazaroff, Engineering Supervisor; Daniel Lee, Engineer; Gloria Ramos, Administrative Assistant	03/31/20	<ul style="list-style-type: none"> ▪ Utilities and Service Systems 	<ul style="list-style-type: none"> ▪ OCSD recommends that a sewer study be performed in the future to assure there is adequate sewer capacity ▪ OCSD states that new or modified connection to OCSD sewer lines requires coordination with OCSD and may require a permit. 	<ul style="list-style-type: none"> ▪ Section 5.18, <i>Utilities and Service Systems</i>
Organizations				
Heninger Park President Ginelle Hardy	3/6/20	<ul style="list-style-type: none"> ▪ Focus Area #1 ▪ Distribution Material 	<ul style="list-style-type: none"> ▪ States that South Main Street Focus Area #1 would potentially affect Heninger Park properties and homes on Sycamore. States that Focus Area #1 includes S. Broadway in Heninger Park. ▪ States that the Heninger Park neighborhood meeting would be an opportunity to present the General Plan update and EIR. Asks City Planner for ideas on how to disperse the information and provide printed informational flyers, tables, and maps. 	<ul style="list-style-type: none"> ▪ Section 5.4, <i>Cultural Resources</i> ▪ This topic is not related to the scope of the Draft PEIR.
Recupero and Associates, Inc. Mike Johnston	3/17/20	<ul style="list-style-type: none"> ▪ GPU Schedule 	<ul style="list-style-type: none"> ▪ Asks about the timeline for the General Plan update and when it may be reviewed and approved by the City Council. 	<ul style="list-style-type: none"> ▪ This topic is not related to the scope of the Draft PEIR.
The Hoffman Company Justin Esayian, Senior Vice President	3/25/20	<ul style="list-style-type: none"> ▪ Mailing list ▪ Scheduling and timing 	<ul style="list-style-type: none"> ▪ Asks to be added to the communication group to receive updates on the General Plan update progress. ▪ Asks when the General Plan update will be finalized. ▪ Asks if the public EIR scoping meeting on March 5 occurred and, if not, asks for information on plans to reschedule it. 	<ul style="list-style-type: none"> ▪ Will receive future notices related to the GPU PEIR.
Rise Up Willowick Cynthia Guerra, Rise Up Willowick Member	3/27/20	<ul style="list-style-type: none"> ▪ Land Use and Planning ▪ Open Space 	<ul style="list-style-type: none"> ▪ Provides a discussion of Rise Up Willowick's mission. States that a focus area for growth and development encompasses the Willowick Golf Course, a critical area of advocacy for the Coalition. States that land 	<ul style="list-style-type: none"> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.14,

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			<p>development needs to understand and meet needs of current residents.</p> <ul style="list-style-type: none"> ▪ Surveyed residents and conducted community engagement for input on vision for Willowick, and their vision includes: (1) parks and open space; (2) affordable housing; and (3) community spaces. Further discusses median income and open space investment. ▪ Concerned about impacts of the General Plan update on open space. Concerned about the lack of assessment proposed in the EIR on the impact of open space in the city; the impact of incentivizing development in five focus areas at the expense of open space. ▪ States that Willowick is the last remaining large-scale open space site in Santa Ana, and EIR needs to address the impacts of depleting the resource. ▪ Provides recommendations for completing the EIR, including: work to accomplish the core values proposed in the General Plan update; include residents in development processes; work with City of Garden Grove for affordable housing and open space in Willowick; and City should add "Open-Space and Parkland" environmental impact category for EIR analyses. 	<p><i>Public Services</i></p> <ul style="list-style-type: none"> ▪ Section 5.15, <i>Recreation</i>
<p>Public Law Center Ugochi Nicholson, Directing Attorney, Housing and Homelessness Prevention Unit</p>	<p>3/27/20</p>	<ul style="list-style-type: none"> ▪ Population and Housing 	<ul style="list-style-type: none"> ▪ Requests that projects that the City has approved and will seek to approve will not detrimentally affect the environment. ▪ Requests that the City ensure that the projects that it approves will affirmatively further fair housing and land use opportunities for its most vulnerable residents. ▪ Provides an overview of the Public Law Center's work. ▪ Asks 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. ▪ States that there is a great need for housing for those who have very-low and extremely-low incomes and provides statistics for the City and Santa Ana Unified School District to demonstrate the need. ▪ States that evictions and displacement impose a high burden on school-aged children and their families. ▪ Requests 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. 	<ul style="list-style-type: none"> ▪ Section 5.13, <i>Population and Housing</i> ▪ Fair housing is not related to the scope of the Draft PEIR.
<p>IMG Construction Management Oscar Uranga, Principal</p>	<p>4/7/20</p>	<ul style="list-style-type: none"> ▪ Urban Neighborhood 	<ul style="list-style-type: none"> ▪ Asks about the proposed changes to the "Urban Neighborhood" land use designation. 	<ul style="list-style-type: none"> ▪ Chapter 3, <i>Project Description</i>

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Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
Individuals				
Pat Coleman	3/27/20	<ul style="list-style-type: none"> ▪ Cultural Resources ▪ Transportation ▪ Geology and Soils 	<ul style="list-style-type: none"> ▪ Requests that older city parks are included when assessing for historical significance and gives the example of Santiago Park. States that the original design and hardscape of early parks are worth preserving whenever possible. ▪ Requests that access management is added to level of service (LOS) evaluations for road design and modifications. States that City currently uses LOS to evaluate road modifications, which does not adequately cover safety, especially pedestrian safety. ▪ Requests that the recommendations and requirements of the Seismic Hazard Mapping Act of 1990 and the Special Publication 117A are considered for inclusion in the Safety Element. States the City's approach to evaluating seismic safety for new development is uneven, even though much of city is in a liquefaction zone. Cites an excerpt from SP 117A. ▪ Requests that a geology section is included in all CEQA studies for projects within the liquefaction zone. States that leaving the study for the permitting process keeps mitigation measures of significant impact out of public view. Provides an example of a project. ▪ States that the SHMA requires that the certified geological study and its professional certified review be submitted to the appropriate state agency. States that this creates a reviewable public record and allows all professionals to own their recommendations. 	<ul style="list-style-type: none"> ▪ Section 5.4, <i>Cultural Resources</i> ▪ This topic is not related to the scope of the Draft EIR. ▪ Section 5.6, <i>Geology and Soils</i>
Lisa Ganz	3/16/20	<ul style="list-style-type: none"> ▪ Land Use and Planning ▪ Density ▪ Open Space/Parks ▪ Transportation ▪ Public Services 	<ul style="list-style-type: none"> ▪ Concerned about adding more high-density housing in the City and states that the "Shared Vision" Plan should focus on quality of life initiatives, including open space/park, less congestion, and quality services. ▪ Housing element should be a part of the analysis, and Mandatory Topics should be looked at in its entirety. ▪ States that EIR needs to be thorough and explains discontent with the environmental analysis prepared for the MainPlace Mall Renovation. ▪ Opposes the plan to turn Grand and 17th into an Urban Neighborhood. Expresses concern regarding congestion and requests that zoning be maintained and incentivize new retail. ▪ States that 55/Dyer development will add more congestion to the crowded 55 freeway. ▪ States that the city needs better streets/timed lights, more open space, retail, reasonable housing that fits historic neighborhoods. 	<ul style="list-style-type: none"> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.13, <i>Population and Housing</i> ▪ Section 5.14, <i>Public Services</i> ▪ Section 5.15, <i>Recreation</i> ▪ Section 5.16, <i>Transportation</i>

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2.3 SCOPING MEETING

Prior to preparation of the Draft PEIR, a public scoping meeting was held on March 5, 2020, to determine the concerns of responsible and trustee agencies and the community regarding the GPU. The scoping meeting was held at the City of Santa Ana and was attended by a number of community members and interested parties (see Appendix A-a for scoping meeting sign-in sheet). Table 2-2 summarizes the issues identified at the scoping meeting and references the section(s) of the Draft PEIR where the issues are addressed.

Table 2-2 Scoping Meeting Comment Summary

Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
Oral Comments at Scoping Meeting (Individuals)				
Albert Castillo	3/5/20	<ul style="list-style-type: none"> ▪ Land Use Density ▪ Transportation ▪ Utilities and Service Systems ▪ Open Space 	<ul style="list-style-type: none"> ▪ Concerned that the General Plan buildout is too high and would add too many people to the city. ▪ Asked how the buildout will be accommodated within the city. ▪ Concerned about street closures, aging infrastructure, and traffic resulting from buildout and addition of new people. ▪ Stated that a cemetery on the Land Use Map is currently identified as green space and it should not be. ▪ Said that the city needs more open space. ▪ Asked how the General Plan update would benefit him and the existing community. 	<ul style="list-style-type: none"> ▪ Section 5-13 <i>Population and Housing</i> ▪ Section 5.16, <i>Transportation</i> ▪ Section 5.18, <i>Utilities and Service Systems</i> ▪ Section 5.15, <i>Recreation</i>
Irma Jauregui	3/5/20	<ul style="list-style-type: none"> ▪ Land Use Density ▪ Open Space and Parks ▪ Quality of Life 	<ul style="list-style-type: none"> ▪ Asked if it is possible to lower buildout or population. Asked if the buildout numbers are a starting point or final. ▪ Asked if the City can add more parks/open space. States that city needs more open space and parks and that obesity is an issue in Santa Ana. ▪ Asked that terms be defined and that a glossary be provided. ▪ Asked if the EIR will address the impact to the quality of life of existing residents. Stated that the General Plan buildout is being done at the expense of the quality of life of existing residents. Wanted to make sure that existing residents are being cared for. 	<ul style="list-style-type: none"> ▪ Section 5.1, <i>Aesthetics</i> ▪ Section 5.2, <i>Air Quality</i> ▪ Section 5.12, <i>Noise</i> ▪ Section 5.13, <i>Population and Housing</i> ▪ Section 5.14, <i>Public Services</i> ▪ Section 5.15, <i>Recreation</i> ▪ Section 5.17, <i>Transportation</i> ▪ Section 5.18, <i>Utilities and Service Systems</i>
Diane Fradkin	3/5/20	<ul style="list-style-type: none"> ▪ Transportation ▪ Phasing ▪ Outreach 	<ul style="list-style-type: none"> ▪ Asked about how streets get reclassified, and what does it mean when a street gets reclassified. ▪ Asked if reclassifying streets results in physical changes. ▪ Asked about the phasing of development with infrastructure improvements. ▪ Asked if downtown streets would become one-way streets. ▪ Stated that she has participated in prior General Plan update outreach events and it does not seem that the 	<ul style="list-style-type: none"> ▪ Section 5.16, <i>Transportation</i>

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Table 2-2 Scoping Meeting Comment Summary

Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
			comments and concerns brought up during those events were incorporated into the land use map or influenced the direction of the plan.	
Cynthia Guerra	3/5/20	<ul style="list-style-type: none"> ▪ Open Space ▪ Population Growth ▪ Focus Areas ▪ Zone Changes ▪ Air Quality ▪ Environmental Justice 	<ul style="list-style-type: none"> ▪ Asked if the Willowick property was targeted for growth, and if so, what parcels. ▪ Concerned about the inclusion of the Willowick property into the Focus Area and asked if the Willowick property could be removed from the Focus Area. ▪ Asked if it would be easier to develop the Willowick property if it remains in the Focus Area. ▪ Concerned about population growth and proposed zone change for Willowick parcels. ▪ Stated that the City should talk to the community and explain why certain areas are in Focus Areas. ▪ Stated that there is nothing left in Santa Ana for open space. ▪ Concerned that the increase in population would impact open space and air quality. Asked how the EIR will account for that. ▪ Asked what specific Willowick parcels are being considered for development. ▪ Stated environmental justice concerns and that some communities in Santa Ana are disproportionately affected. 	<ul style="list-style-type: none"> ▪ Section 5.2, <i>Air Quality</i> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.13, <i>Population and Housing</i> ▪ Section 5.15, <i>Recreation</i> ▪ The topic of environmental justice will be incorporated throughout the General Plan update, with goals and policies incorporated into multiple elements.
John Trapmans [Speaker name not confirmed.]	3/5/20	<ul style="list-style-type: none"> ▪ Define terms 	<ul style="list-style-type: none"> ▪ Asked about how terms in the GPU are defined and how they contribute to density, including “urban neighborhood.” ▪ Wanted more information about the GPU in order to provide commentary. 	<ul style="list-style-type: none"> ▪ Chapter 3, <i>Project Description</i>
Dale Helvig	3/5/20	<ul style="list-style-type: none"> ▪ Land Use Density 	<ul style="list-style-type: none"> ▪ Asked if the City was going to buy more land in order to accommodate the anticipated growth. Stated that the General Plan update will increase density in the city. ▪ Asked if the General Plan update was available online. 	<ul style="list-style-type: none"> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.13, <i>Population and Housing</i>
Ginelle Hardy	3/5/20	<ul style="list-style-type: none"> ▪ Cultural Resources 	<ul style="list-style-type: none"> ▪ Asked how the City was going to analyze historic resources. ▪ Asked if a historic resources report is available. ▪ Asked if South Main is being recategorized. ▪ Concerned about historic buildings that are being removed or demolished. 	<ul style="list-style-type: none"> ▪ Section 5.4, <i>Cultural Resources</i>

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Table 2-2 Scoping Meeting Comment Summary

Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
			<ul style="list-style-type: none"> ▪ Asked how EIR will address historic areas and individual resources. ▪ Stated that the Pacific Electric Park and bicycle trails were missing from the Land Use Map. 	
Tay Aston	3/5/20	<ul style="list-style-type: none"> ▪ Define terms ▪ Parking 	<ul style="list-style-type: none"> ▪ Asked what District Center meant. ▪ Asked about parking analyses. 	<ul style="list-style-type: none"> ▪ Chapter 3, <i>Project Description</i> ▪ Parking is not a CEQA issue.
[Speaker name not recorded.]	3/5/20	<ul style="list-style-type: none"> ▪ Environmental Justice ▪ Transportation 	<ul style="list-style-type: none"> ▪ Concerned about the passage of large diesel vehicles and paint trucks and their impact on residents. States that this should be one of the biggest focuses of the General Plan update. 	<ul style="list-style-type: none"> ▪ Section 5.2, <i>Air Quality</i>
Sam Romero	3/5/20	<ul style="list-style-type: none"> ▪ Air Quality 	<ul style="list-style-type: none"> ▪ Added to the prior speaker's comment and said that the trucks create air quality concerns. 	<ul style="list-style-type: none"> ▪ Section 5.2, <i>Air Quality</i>
Chris Schmidt	3/5/20	<ul style="list-style-type: none"> ▪ Transportation ▪ Public Services ▪ Zoning 	<ul style="list-style-type: none"> ▪ Concerned about the traffic study and circulation. Stated that a lot of the streets in the city are already operating at the lowest rating, so adding more vehicles to an already bad rating would not be adequately accounted for. ▪ Asked if fire and police services were going to be analyzed. ▪ Asked if the General Plan update would prevent or stop a person from redesignating a zone. 	<ul style="list-style-type: none"> ▪ Traffic and congestion are no longer CEQA issues. ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.14, <i>Public Services</i> ▪ Section 5.16, <i>Transportation</i>
[Speaker name not recorded.]	3/5/20	<ul style="list-style-type: none"> ▪ Land Use and Planning ▪ Transportation ▪ Population and Housing 	<ul style="list-style-type: none"> ▪ Concerned about the City's ability to accommodate high density housing and vehicles. Stated that people will still need to drive. ▪ Stated that there is an imbalance between business growth and residential growth and there needs to be more of a balance. ▪ Asked how the General Plan update would increase business opportunities in the city. 	<ul style="list-style-type: none"> ▪ Traffic and congestion are no longer CEQA issues. ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.13, <i>Population and Housing</i> ▪ Section 5.16, <i>Transportation</i>
Patricia Coleman	3/5/20	<ul style="list-style-type: none"> ▪ Aesthetics ▪ Land Use and Planning ▪ Process 	<ul style="list-style-type: none"> ▪ Asked for more information on what is being proposed to change and what the city will look like in the future. ▪ Asked if there would be additional opportunities to address concerns in the future if the concerns were not brought up during the scoping meeting. 	<ul style="list-style-type: none"> ▪ Section 5.1, <i>Aesthetics</i> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ The public will have an opportunity to comment on the Draft PEIR during the 45-day public comment period.

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Table 2-2 Scoping Meeting Comment Summary

Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
[Speaker name not recorded.]	3/5/20	<ul style="list-style-type: none"> ▪ Environmental Consultant 	<ul style="list-style-type: none"> ▪ Concerned that the environmental consultants would be biased in the preparation of the environmental analyses. Said that a neutral organization needs to prepare the EIR and plans and analyze impacts. Asked for environmental consultant's promise to prepare an unbiased analysis. 	<ul style="list-style-type: none"> ▪ N/A
[Speaker name not recorded.]	3/5/20	<ul style="list-style-type: none"> ▪ Communication 	<ul style="list-style-type: none"> ▪ Said that the City can do a better job communicating to the public about the General Plan update and in general. 	<ul style="list-style-type: none"> ▪ Once complete, the DEIR will be available for a 45-day public review period and will be posted on the City's website.
[Speaker name not recorded.]	3/5/20	<ul style="list-style-type: none"> ▪ Population and Housing ▪ Land Use and Planning ▪ Recreation 	<ul style="list-style-type: none"> ▪ Said that the City of Santa Ana thinks that it needs more housing but residents do not agree with that. ▪ Concerned about increase in density. ▪ Asked that the EIR study the effects of electric vehicles going forward. ▪ Said that the city needs more jobs, more green space, and not more housing. 	<ul style="list-style-type: none"> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.13, <i>Population and Housing</i> ▪ Section 5.15, <i>Recreation</i>
[Speaker name not recorded.]	3/5/20	<ul style="list-style-type: none"> ▪ Outreach/ Communication 	<ul style="list-style-type: none"> ▪ Said that surveys given at community meetings could be better. 	<ul style="list-style-type: none"> ▪ N/A
Comment Cards and E-mailed Comments (Individuals)				
Pedro Aranda (Zapateria Aranda)	3/5/20	<ul style="list-style-type: none"> ▪ N/A 	<ul style="list-style-type: none"> ▪ Provides a sketch. 	<ul style="list-style-type: none"> ▪ N/A
Tay Aston	3/5/20	<ul style="list-style-type: none"> ▪ Parking ▪ Open Space ▪ Define Terms 	<ul style="list-style-type: none"> ▪ States that increasing housing should also entail on-site parking for multiple drivers living in the units. The current requirement is insufficient and will have a negative effect on the use and safety of surrounding neighborhoods. ▪ Requests that open space be increased. States that adding multiunit residences without providing open space is a concrete jungle in the making. ▪ Requests that terms be defined, e.g., District Center; Low-, Mid-, etc. residential, environmental justice. 	<ul style="list-style-type: none"> ▪ Parking is not a CEQA issue. ▪ Section 5.15, <i>Recreation</i> ▪ Chapter 3, <i>Project Description</i>
Diane Fradkin	3/5/20	<ul style="list-style-type: none"> ▪ Transportation ▪ Noise ▪ Air Quality ▪ Greenhouse Gas Emissions ▪ Density ▪ Utilities and Service Systems 	<ul style="list-style-type: none"> ▪ States that regarding the Urban Neighborhood (UN) designation for the Medical Arts property, the property is a very constricted parcel, with the western boundary being railroad tracks. States that there is a proposal to do a grade separation for the railroad crossing at 17th and Lincoln that will greatly restrict access from the Medical Arts property onto 17th Street. States that the UN designation will add too much traffic, noise, air quality issues, and greenhouse gas to an already congested 17th Street and Grand. States this UN designation needs a parks/open space component. ▪ States that she attended a General Plan update meeting last summer and took a survey for the Medical Arts property, and majority of attendees of the meeting did not want to see more high density at this location. States that this will impact existing residents in a negative way. Way 	<ul style="list-style-type: none"> ▪ Section 5.2, <i>Air Quality</i> ▪ Section 5.7, <i>Greenhouse Gas Emissions</i> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.12, <i>Noise</i> ▪ Section 5.16, <i>Transportation</i> ▪ Section 5.18, <i>Utilities and Service Systems</i>

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Table 2-2 Scoping Meeting Comment Summary

Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
			<p>too dense for an already dense area.</p> <ul style="list-style-type: none"> ▪ Concerned that existing infrastructure (streets, sewer, water, storm drain) cannot handle the proposed density, unless projects will add new roadways and water/sewer/storm drain. ▪ Requests clarification on the circulation plan regarding roadway classifications (and changes to roadway classifications), physical changes to roadways, and phasing of roadway improvements with construction. 	<ul style="list-style-type: none"> ▪ Section 5.15, <i>Recreation</i>
Soledad Valentin	3/5/20	<ul style="list-style-type: none"> ▪ Maintenance ▪ Utilities and Service Systems 	<ul style="list-style-type: none"> ▪ States that at the corner of First and Standard there are cars that do not function and asks that the cars be moved to a more adequate location for them and for their owners. ▪ Asks that primary roads are kept clean and that businesses clean outside and keep it clean. ▪ Asks that when there is building construction that there be a focus on water, electricity, and gas pipelines and for them to be brand new. 	<ul style="list-style-type: none"> ▪ These topics are not related to the scope of the Draft PEIR.
Diane Fradkin	3/6/20	<ul style="list-style-type: none"> ▪ Land Use and Planning; ▪ Density and overcrowding; ▪ Infrastructure; ▪ Roadway access; and ▪ Alternatives 	<ul style="list-style-type: none"> ▪ Concerned about the use of “Urban Neighborhood” in the Grand and 17th Street area. ▪ Stated that her experience door knocking across Santa Ana is that Santa Ana residents do not want more high density residential. Stated that residents are concerned overcrowding will cause more stress to an overstressed and older infrastructure and want “responsible development.” ▪ Concerned about density and overcrowding. ▪ Requests several alternatives to for the Grand and 17th Street section in the EIR and gives two examples. An alternative that include more single-family residential, town homes, low-rise garden-style apartments, parks, retail, and office. Another alternative that includes a Costco with gas sales, office, and residential (single-family, townhomes, and low-rise garden-style multifamily with park component). ▪ Requests the General Plan update to account for medical office uses in the Grand and 17th section. ▪ Suggests that land use and design accounts for grade separation at 17th and Lincoln for the railroad tracks. States that this will likely inhibit access along 17th Street and focus more access along Grand Avenue. 	<ul style="list-style-type: none"> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.13, <i>Population and Housing</i> ▪ Section 5.14, <i>Public Services</i> ▪ Section 5.15, <i>Recreation</i> ▪ Section 5.16, <i>Transportation</i> ▪ Section 5.18, <i>Utilities and Service Systems</i> ▪ Chapter 7, <i>Alternatives</i>
John Fradkin	3/6/20	<ul style="list-style-type: none"> ▪ Housing Density ▪ Land Use and Planning ▪ Define terms 	<ul style="list-style-type: none"> ▪ Concerned about adding more housing to a built-out city. States that current residents want businesses, local jobs, parks, and open space. ▪ States that EIR should take into account that automotive industry is shifting to electric vehicles, which reduces greenhouse gases, and states that this makes transit-oriented development less relevant. ▪ Requests that zoning terms be defined early on. ▪ States that the “Urban Neighborhood” mixed-use zoned areas should provide for horizontal mixed-use building, not vertical buildings. 	<ul style="list-style-type: none"> ▪ Section 5.10, <i>Land Use and Planning</i> ▪ Section 5.13, <i>Population and Housing</i> ▪ Chapter 3, <i>Project Description</i>

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Table 2-2 Scoping Meeting Comment Summary

Commenting Agency/Person	Date	Comment Type	Comment Summary	Issue Addressed In:
Lisa Ganz	3/6/20	▪ Link to General Plan Information	▪ Requests a link to the General Plan update information.	▪ N/A
Jessie Lopez	3/6/20	▪ Future Meetings	▪ Asked if there will be another meeting.	▪ N/A

As noted in Table 2-2, several scoping comments were voiced and/or received about traffic impacts to Santa Ana’s circulation network, especially related to the proposed increase in high density residential units; land use issues, increased densities, and overcrowding, specifically in association with the 55 Freeway/Dyer Road focus area; air quality impacts for city residents with an emphasis on environmental justice; and adequacy of public services and utilities, mainly water and wastewater facilities, roadways, and parks and open space.

The City acknowledges the comments and concerns of adjacent cities related to the level of growth projected in Santa Ana. The City will work closely with cities adjacent to General Plan Focus Areas when preparing the Santa Ana Parks and Recreation Master Plan to ensure that the Dyer/55 Focus Area and other growth areas of the city provide additional recreation, parks, and core services essential for making complete communities. In addition, the City shall identify additional funding sources from new development projects to procure land or in-lieu fees for installation of parks in the immediate vicinity of proposed development in order to minimize the potential for impacts to adjacent communities with regard to parks and open space utilization. The inclusion of publicly accessible open space is also part of the City of Santa Ana’s development standards for residential/mixed-use development projects to address open space and recreation needs.

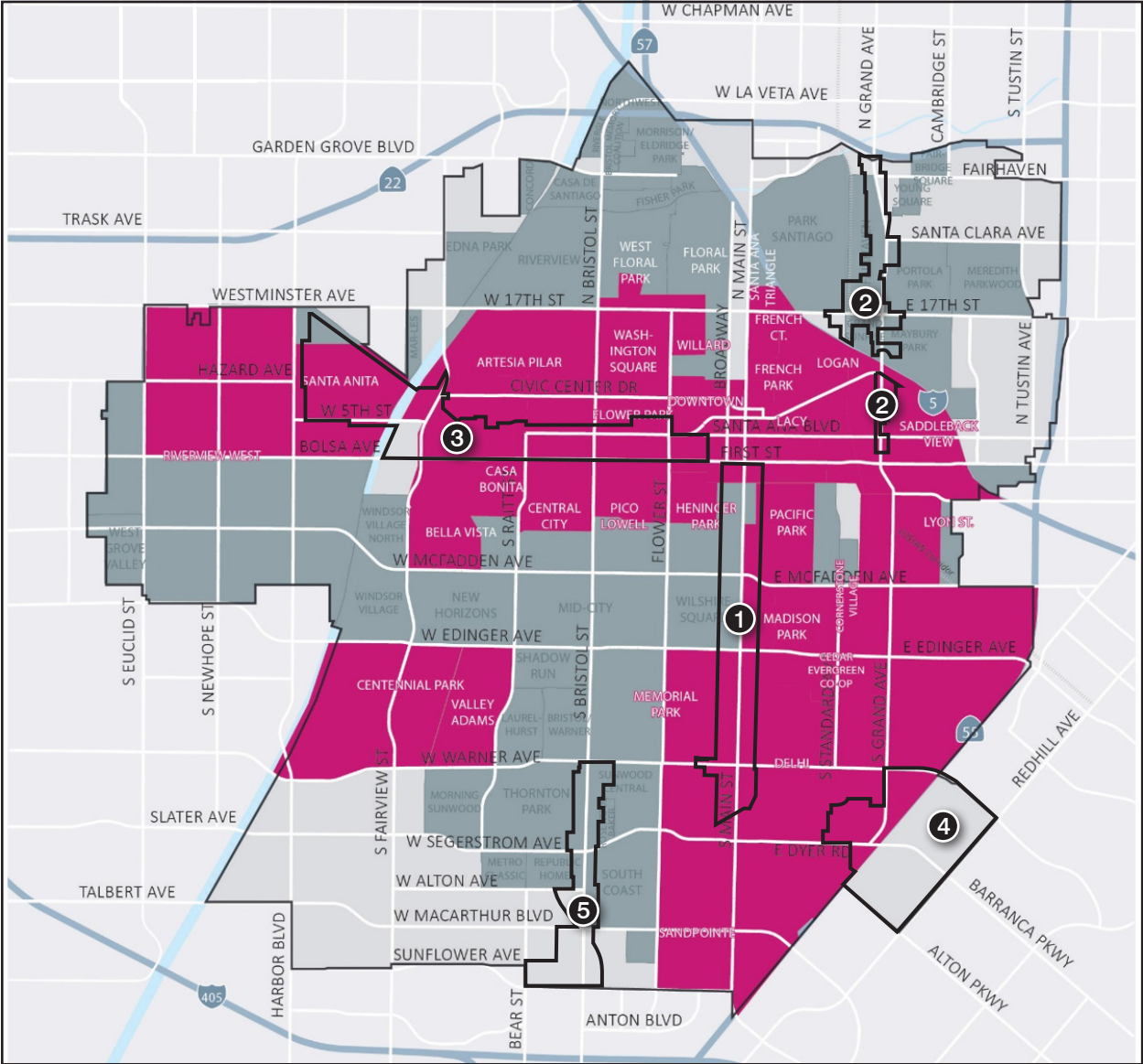
2.4 ENVIRONMENTAL JUSTICE OUTREACH

In 2016, the California Legislature passed Senate Bill 1000 (SB 1000), Planning for Healthy Communities Act, to incorporate environmental justice into the local land use planning process. SB 1000’s definition of a disadvantaged community includes areas that: 1) are disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation; and 2) have concentrations of people with low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment. Additionally, the term “community” can be defined or understood as various geographic places, ranging from a neighborhood to a small unincorporated area to a small region.

The California Communities Environmental Health Screening Tool, or CalEnviroScreen, was developed by the Office of Environmental Health Hazards Assessment on behalf of CalEPA. CalEnviroScreen is a method for identifying communities that are disproportionately burdened by pollution and/or have a disproportionately vulnerable population. Areas defined as EJ communities are shown in Figure 2-1, *EJ Communities, Neighborhoods, and Focus Areas* (also refer to Section 4.3.3, *Environmental Justice Communities*).

The City’s GPU EJ community outreach program included a wide variety of tools to notify and engage the community throughout the preparation of the GPU.

Figure 2-1 - EJ Communities, Neighborhoods, and Focus Areas



- City of Santa Ana
- █ Neighborhood
- █ EJ Communities

Focus Areas

- ① 1 South Main Street
- ② 2 Grand Ave/17th Street
- ③ 3 West Santa Ana Boulevard
- ④ 4 55 Freeway/Dyer Road
- ⑤ 5 South Bristol Street



Source: PlaceWorks, 2021

2. Introduction

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2. Introduction

2.4.1 EJ Outreach Prior to Draft PEIR Public Review

At the start of the General Plan update process, in late 2015, the City sought to meaningfully engage community residents, looking for best practices and community partnerships to reach all residents, especially those that have not traditionally engaged in the public decision-making process. The General Plan Outreach Program included a series of 40 community workshops starting in 2015; informational "pop-ups" at community events; presentations to focus groups; and the convening of a General Plan Advisory Group composed of 17 members of the community, including seniors, youth, community-serving organizations, Community Linkages Neighborhood Leaders, and City commissioners. Translation services were offered during the meetings, and videos of workshops were archived and made available for those unable to attend in person.

A variety of community issues, including environmental justice issues, were identified through these outreach activities. With this community input, the Draft General Plan Policy Framework was created in December 2018, and Community "Core Values" were created to reflect the voice of the collective Santa Ana community and to express its environmental justice principles. Because these core values touch all aspects of the GPU and general plan elements, it was determined early in the process to weave environmental justice components as policies into the fabric of the various elements, elevating their importance and prominence in each element.

To continue a community dialogue on environmental justice and obtain community feedback, the City mailed over 32,000 environmental justice informational flyers in late May 2020 to property owners, occupants, and residents in EJ communities as defined by CalEnviroScreen (see Figure 2-1, *EJ Communities, Neighborhoods, and Focus Areas*). Subsequently, on July 31 and August 1, 2020, the City held two virtual meetings to obtain input on the general plan elements and environmental justice issues. Over 22,000 mailers were sent inviting residents, businesses, and property owners within and 500 feet around the five land use focus areas to participate in these community meetings.

Based on feedback from the July 31 and August 1 community meetings, on August 31, 2020, the City held a Community Outreach Roundtable with approximately 20 participants for improving outreach efforts for the General Plan Update, including in EJ neighborhoods. The roundtable convened again on October 14, 2020, to gather additional feedback on the City's GPU EJ policies.

On September 15, 2020, City staff held a meeting with the Madison Park Neighborhood Association and University of California, Irvine (UCI) to discuss EJ issues. City staff also held an Anti-displacement Roundtable with the THRIVE local organization on October 13, 2020. And City staff held two additional meetings in September and October 2020 with Orange County Environmental Justice (OCEJ), UCI Public Health educators, and the Orange County Healthcare Agency regarding lead contamination studies and policies.

On October 19, 2020, neighborhood leaders from the 30 neighborhoods in EJ disadvantaged communities were invited to learn more about environmental justice policies and programs. City staff provided an overview of SB 1000 legislation to neighborhood leaders, followed by open question-and-answer discussions. The City also attended the Community Forum on October 23, 2020, that was convened by OCEJ, Santa Ana Active Streets, Madison Park Neighborhood Association, Rise Up Willowick, and the Kennedy Commission to address concerns including environmental justice.

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2.4.2 2021 EJ Community Outreach

A Spring 2021 EJ Community Outreach campaign was conducted between January and May of 2021. The campaign began with two GPU environmental justice roundtable meetings that included residents and community-serving organizations to provide feedback on the campaign's outreach tools and approach. The primary outreach tools for the campaign included multilingual EJ meeting flyers and surveys and 10 virtual meetings (shown in Table 2-3).

Table 2-3 Neighborhood Cluster Meetings

Name	Date	Attendees
Neighborhood Cluster Meeting 1 Artesia Pilar and Flower Park	03/30/2021	Artesia Pilar Neighborhood Association, Flower Park Neighborhood Association, Santa Ana College, Orange County Labor Federation, City Councilmembers and Mayor, Latino Health Access, Santa Ana Police Department
Neighborhood Cluster Meeting 2 Delhi and Santa Ana Memorial Park	04/05/2021	Delhi Neighborhood Association, Santa Ana Memorial Park Neighborhood Association, City Councilmembers and Mayor, Santa Ana Police Department, Delhi Center, Orange County Environmental Justice, UCI, Santa Ana Unified, Smart Union
Neighborhood Cluster Meeting 3 Heninger Park and Pacific Park	04/21/2021	Heninger Park Neighborhood Association, Pacific Park Neighborhood Association, City Mayor, Orange County Catholic Worker, Republic Services, Santa Ana Unified, Holy Family Catholic School
Neighborhood Cluster Meeting 4 Lacy, Logan, and Downtown	04/27/2021	Lacy Neighborhood Association, Logan Neighborhood Association, Downtown Neighborhood Association, America On Track, Delhi Center, Elite Fitness Downtown, Republic Services, Santa Ana Unified, Morrissey Associates Inc, City Mayor
Neighborhood Cluster Meeting 5 Saddleback View and Lyon Street	04/29/2021	Saddleback View Neighborhood Association, City Councilmember, City Manager's Office, Santa Ana College, Republic Services, Santa Ana Police Department
Neighborhood Cluster Meeting 6 Centennial Park and Sandpointe	05/03/2021	Centennial Park Neighborhood Association, Sandpointe Neighborhood Association, Valley Adams Neighborhood Association, City Mayor and City Councilmembers, SoCalGas, Heritage Museum of OC
Neighborhood Cluster Meeting 7 French Park, French Court, Willard, Washington Square, and Santa Ana Triangle	05/06/2021	French Park Neighborhood Association, Willard Neighborhood Association, Casa De Santiago Neighborhood Association, City Mayor, Republic Services, Santa Ana Unified
Neighborhood Cluster Meeting 8 Central City, Pico-Lowell, Bella Vista, Casa Bonita, and Valley Adams	05/11/2021	Casa Bonita Neighborhood Association, New Horizons Neighborhood Association, Casa De Santiago Neighborhood Association, America On Track, City Manager's Office
Neighborhood Cluster Meeting 9 Madison Park, Cornerstone Village and Cedar Evergreen	05/17/2021	Madison Park Neighborhood Association, Cedar Evergreen Neighborhood Association, City Councilmembers, Cambodian Family Center, Samueli Academy, UCI
Neighborhood Cluster Meeting 10 Riverview West, Santa Anita, West Floral Park, Floral Park, Artesia Pilar and Flower Park	05/26/2021	Flower Park Neighborhood Association, City Councilmembers, Rise Up Willowick, and Riverview West Neighborhood Association

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Meeting flyers were mailed to every address within the environmental justice communities in Santa Ana. A total of 40,459 residences/occupants and property owners received a flyer letting them know of the upcoming virtual environmental justice meeting taking place for their neighborhood, as well as encouraging participation in the EJ survey. The meeting flyers were provided in English, Spanish, and Vietnamese and mailed to the community a minimum of two weeks before the virtual meeting date. The EJ survey was also available in English, Spanish, and Vietnamese.

Over 40 residents, community organizations, and faith-based organizations assisted in distributing the flyers and surveys. Each neighborhood leader received an “EJ outreach kit” that consisted of meeting flyers, surveys, meeting yard sign, survey drop box, survey yard sign, and business cards with a QR code to the GPU website and EJ survey. Through this effort, approximately 2,500 meeting flyers, 1,400 hard copy surveys, and 450 business cards were distributed to neighborhood leaders to share with their neighborhoods. In total, 746 surveys were collected, including 670 surveys submitted online and 76 submitted as a hard copy.

Social media outreach consisted of Constant Contact email campaigns, Nextdoor notifications, PeachJar, Facebook, Instagram, Nixle, city manager’s newsletter (*COSAS*), and Voiceshot. A Constant Contact email campaign was sent out for all 10 EJ meetings that included the designated neighborhood associations. In total, 7,879 emails were sent to residents, community organizations, and faith-based organizations. Nextdoor notifications were sent to subscribers in each neighborhood association. A PeachJar email campaign was distributed to 44 schools that were in environmental justice neighborhoods, both within the Santa Ana Unified School District and Garden Grove Unified School District. Emails were sent to parents, and meeting flyers were posted on the school web page. In total, 17,404 emails were sent to parents and guardians. A total of 7 Facebook posts were made regarding the environmental justice meetings. The followers on the City’s Facebook page total approximately 23,000. Five Instagram posts were sent to the City’s 19,000 followers. The city manager’s newsletter included information about the EJ meetings. The newsletter is sent out every other week as an email campaign to approximately 10,000 contacts. Voice messages regarding Neighborhood Cluster Meetings 6 and 8 (as shown in Table 2-3) were sent to 1,475 contacts. Residents received a live message or a voicemail.

The 10 virtual community meetings were held on Zoom. Each meeting had different neighborhood associations that are part of an environmental justice community. The meetings provided Spanish and Vietnamese simultaneous interpretation. Instructions on how to access the interpretation feature was provided during the meeting in both Spanish and Vietnamese. The PowerPoint presentation was translated to Spanish and Vietnamese, and a web link was provided so attendees could access the presentations in their preferred language. The meeting name, date, and attendees are shown in Table 2-3.

Furthermore, the General Plan Update identifies policies and implementation actions to promote ongoing community outreach and engagement to ensure the community’s voice is included in future policy decisions. These are shown in Appendix A-b. The appendix lists EJ-relevant policies and implementation actions in six categories, including “Enhancing Civil Engagement.”

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2.5 SCOPE OF THE DRAFT PEIR AND RECIRCULATED PEIR

The scope of the Draft PEIR was determined based on the City's NOP, the scoping meeting, and comments received in response to the NOP and at the scoping meeting. The Recirculated PEIR process does not require a new NOP or scoping meeting. The scope of the Recirculated PEIR is based on the conditions that required its preparation. The conditions as described in Section 1.4, *Recirculated PEIR*, include the City's decision to reclassify the GPU's potential recreation impacts as significant. The City also recognized the opportunity to more thoroughly disclose existing conditions and potential GPU impacts on disadvantaged communities.

Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the PEIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance.

The information in Chapter 3, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts. However, further environmental review by the City may be required as more detailed information and plans are submitted on a project-by-project basis.

2.5.1 Impacts Found Not to Be Significant

As detailed in Chapter 8, *Impacts Found Not to Be Significant*, the City of Santa Ana determined that the following environmental impact categories were not significantly affected by or did not affect the GPU.

- Agriculture and Forestry Resources
- Wildfire

2.5.2 Potentially Significant Adverse Impacts

Eighteen environmental factors have been identified with potentially significant impacts if the GPU is implemented:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing

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- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

2.5.3 Unavoidable Significant Adverse Impacts

2.5.3.1 DRAFT PEIR

The Draft PEIR identified five environmental topics with significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the GPU. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. If the City of Santa Ana, as the lead agency, determines that unavoidable significant adverse impacts will result from the GPU, the City must prepare a “Statement of Overriding Considerations” before it can approve the project. A Statement of Overriding Considerations states that the decision-making body has balanced the benefits of the GPU against its unavoidable significant environmental effects and has determined that the benefits of the project outweigh the adverse effects, and therefore the adverse effects are considered acceptable. The impacts that were found in the Draft PEIR to be significant and unavoidable are:

Air Quality

- **Impact 5.2-1** The General Plan update would be inconsistent with the South Coast Air Quality Management Plan (AQMP) because buildout under the plan would exceed the population estimates assumed for the AQMP and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB).
- **Impact 5.2-2** Construction activities associated with buildout of the General Plan update would generate short-term emissions that exceed the South Coast Air Quality Management District’s (AQMD) significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB.
- **Impact 5.2-3** Buildout in accordance with the General Plan update would generate long-term emissions that would exceed South Coast AQMD’s regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB.
- **Impact 5.2-4** Buildout of the General Plan update could expose sensitive receptors to substantial concentrations of toxic air contaminants.
- **Impact 5.2-5** Construction and operation emissions generated by individual development projects have the potential to exceed South Coast AQMD’s Local Significance Thresholds.

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Cultural Resources

- **Impact 5.4-1** The proposed General Plan update would allow development in areas that have historic resources identified by previous cultural resource surveys. Development in these areas would, therefore, potentially cause the disturbance of historic resources in the plan area.

Greenhouse Gas Emissions

- **Impact 5.7-1** Implementation of the proposed General Plan update would result in a decrease in GHG emissions in horizon year 2045 from existing baseline but may not meet the long-term GHG reduction goal under Executive Order S-03-05.

Noise

- **Impact 5.12-1** Due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential longevity of construction activities, construction noise could result in a temporary substantial increase in noise levels above ambient conditions.
- **Impact 5.12-2** Buildout of the individual land uses and projects for implementation of the General Plan update would expose existing residences to project-generated traffic noise.

Population and Housing

- **Impact 5.13-1** At buildout, the General Plan update would result in an increase in population and housing units that exceeds the Orange County COG projections by approximately 20 and 38 percent, respectively. There are no feasible mitigation measures, and impacts would be significant and unavoidable.

These impacts are individually analyzed in Section 5.2, *Air Quality*; Section 5.4, *Cultural Resources*; Section 5.7, *Greenhouse Gas Emissions*; Section 5.12, *Noise*; and Section 5.13, *Population and Housing*, and summarized in Chapter 6 of the Draft PEIR.

2.5.3.2 RECIRCULATED DRAFT PEIR

This Recirculated Draft PEIR identifies one additional environmental topic with significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the GPU: Recreation.

- **Impact 5.15-1:** The General Plan update would generate additional residents that would increase the use of existing park and recreational facilities such that substantial physical deterioration of the facility could occur or be accelerated.

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- **Impact 5.15-2:** Population increases resulting from project implementation would increase recreation demands that would require construction or expansion of recreation facilities that would have potential to result in physical impacts to the environment.

2.6 INCORPORATION BY REFERENCE

All documents cited or referenced are incorporated into the Draft PEIR in accordance with CEQA Guidelines Sections 15148 and 15150, including but not limited to:

- City of Santa Ana General Plan (existing 16 elements)
- City of Santa Ana Municipal Code

In each instance where a document is incorporated by reference for purposes of the report, the Draft PEIR shall briefly summarize the incorporated document or briefly summarize the incorporated data if the document cannot be summarized. In addition, the Draft PEIR shall explain the relationship between the incorporated part of the referenced document and the Draft PEIR.

The Draft PEIR and Recirculated PEIR also rely on previously adopted regional and statewide plans and programs, agency standards, and background studies in its analyses, such as the South Coast Air Quality Management District's air quality management plans and *CEQA Air Quality Handbook*. Chapter 12, *Bibliography*, provides a complete list of references used in preparing the Draft PEIR. All of the documents that are incorporated by reference are available for review at:

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

2.7 FINAL PEIR CERTIFICATION

2.7.1 Recirculated Draft PEIR Public Review and Comments

The Draft PEIR was circulated for public review for a period of 65 days. Interested agencies and members of the public were invited to provide written comments on the Draft PEIR to the City of Santa Ana at the address shown below and on the title page of the document. Upon completion of the 65-day review period, the City reviewed all written comments received and prepared a written response for each comment. A Final PEIR incorporated all of the comments received, responses to the comments, and any changes to the Draft PEIR that resulted from the comments received. The Final PEIR was presented to the City for potential certification as the environmental document for the GPU. All persons who commented on the Draft PEIR were notified of the availability of the Final PEIR, the date of the Santa Ana Planning Commission public hearing (see Table 1-1 *General Plan Update Chronology*), and potential certification of the Final PEIR.

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The Draft PEIR is available to the general public for review at these locations:

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

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

The Draft PEIR is also available on the City's website at <https://www.santa-ana.org/general-plan>.

All comments received from agencies and individuals on the Draft PEIR were accepted during the 65-day public review period. All comments on the Draft PEIR were sent to:

City of Santa Ana Planning and Building Agency
PO Box 1988 (M-20)
Santa Ana, CA 92702

All public agencies that submitted comments during the 65-day public review period on the Draft PEIR received written responses to their comments at least 10 days prior to final action on the GPU. A public hearing to consider the Final PEIR was held on November 9, 2020. The Planning Commission voted not to certify the Final PEIR and to continue work on the GPU to a future date to allow additional time for outreach to Santa Ana's environmental justice communities.

2.7.2 Recirculated DPEIR Public Review and Comments

A Recirculated EIR requires the same noticing and consultation as the original Draft EIR (CEQA Guidelines Sections 15086 and 15087). Sections 1.4.3 and 1.4.4, respectively, describe the CEQA options for recirculation and response to comments, and the process that the City has selected for this Recirculated Draft PEIR. As described, the public will be clearly directed to only comment on the updated, recirculated portions of the Draft PEIR. Responses will be prepared to address the new comments.

2.8 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that agencies adopt a monitoring and reporting program for any project for which it has made findings pursuant to Public Resources Code 21081 or adopted a Negative Declaration pursuant to 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The Mitigation Monitoring and Reporting Program for the GPU will be completed in conjunction with the Final Recirculated PEIR and prior to consideration of the GPU by the City Planning Commission and City Council.