

5. Environmental Analysis

5.15 RECREATION

This section of the Recirculated Draft Program Environmental Impact Report (Draft Recirculated PEIR) evaluates the potential impacts on recreation in the City of Santa Ana associated with implementation of the General Plan Update (GPU). The potential for adverse impacts on accessibility of recreational facilities to existing and proposed residential neighborhoods, and impacts resulting from the construction of additional recreational facilities are evaluated based on existing facilities and their usage.

Subsequent to release of the Draft PEIR, a substantial level of concern arose regarding park and open space impacts associated with implementation of the GPU. Comments on the Draft PEIR focused on a lack of open space and recreation facilities within the City and raised the following issues:

- The substantial increase in population generated by the GPU when the city currently does not achieve its park standard of two acres per 1,000 people.
- Whether the GPU can ensure that parks/open space would be equitably distributed to serve city residents and disadvantaged communities in particular.
- The potential impact on park facilities in neighboring jurisdictions, particularly the City of Tustin, given the proximity of the 55 Freeway/Dyer Road Focus Area and the introduction of a substantial increase in population in this area.
- Whether in-lieu fees to mitigate park/open space impacts would translate into actual facilities given the lack of vacant properties in the city.

The Draft PEIR concluded that upon implementation of required regulatory requirements and GPU policies, impacts to Recreation would be less than significant. It is typical in CEQA documents to conclude that project-related Recreation impacts would be mitigated to less than significant after compliance with Quimby Act fees and a lead agency's municipal code requiring payment of park fees or dedicated land for recreation uses. This is usually a defensible conclusion since CEQA requires mitigation of a proposed project's impact on existing conditions and does not require that mitigation remedy existing conditions. Upon consideration of the numerous comments received on the GPU, however, the City recognized that although applicable fees would be required for future development, there is no certainty that there would be available land in Santa Ana to develop additional park facilities to serve the increased population. Additionally, increased population generated by implementation of the GPU has the potential to further exacerbate the lack of available park and open space in disadvantaged communities.

The supplemental analysis in this Recirculated Draft PEIR, therefore, adds additional geographic context to understand existing conditions and the potential impact of implementing the GPU. This section has also been updated to reflect the additional GPU policies and implementation actions proposed to address parks and open space subsequent to distribution of the Draft PEIR and Planning Commission public hearing in November 2020. And finally, the PEIR has been revised to classify the significance of population growth associated with GPU implementation on Recreation to be significant and unavoidable.

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5.15.1 Environmental Setting

5.15.1.1 REGULATORY BACKGROUND

State

California Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California's Public Park Preservation Act of 1971. Under California Public Resources Code Sections 5400 et seq., cities and counties may not acquire any real property that is in use as a public park for any nonpark use unless compensation, land, or both are provided to replace the parkland acquired. This ensures no net loss of parkland and facilities.

Quimby Act

The 1975 Quimby Act (California Government Code Section 66477) authorizes cities and counties to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities. A 1982 amendment (AB 1600) requires agencies to clearly show a reasonable relationship between the public's need for the recreation facility or parkland, and the type of development project upon which the fee is imposed. Cities and counties with a high ratio of park space to inhabitants can set a standard of up to five acres per 1,000 people for new development. Cities and counties with a lower ratio can require the provision of up to three acres of park space per 1,000 people. The calculation of a city or county's park space to population ratio is based on a comparison of the population count of the last federal census to the amount of city/county-owned parkland.

Local

City of Santa Ana Municipal Code

The City of Santa Ana Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. The following provisions from the municipal code focus on park service impacts associated with new development projects and subdivisions and are relevant to the General Plan Update.

Chapter 34, Article VIII (Regulations for Dedication of Land for Park or Recreational Purposes): As a condition of approval of a final subdivision map for any subdivision with more than 50 parcels proposed for residential use, the subdivider may be required to dedicate land for park and recreational purposes at the time of final map approval. The dedication of land should promote the general standard of providing two acres of property devoted to parks and recreational purposes for each thousand persons residing in Santa Ana. The standards for determining land to be dedicated are shown in Table 5.15-1.

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Table 5.15-1 Standards for Dedication of Land

Dwelling Unit Type	Assumed Density Per Acre	Assumed Persons per Unit	Land to Be Dedicated per Dwelling Unit	
			Acre	Square Feet
Single-family	3 to 7.3	4.0	0.008	348.5
Duplexes	8.14	3.0	0.006	261.4
Multifamily	Variable	2.4	0.005	209.1

Source: Santa Ana 2019 (SAMC Section 34-204).

Chapter 35, Article IV (Residential Development Fee): Requires that any person adding net residential units or converting apartments to condominiums pay fees, dedicate land in lieu thereof, or a combination of both for the purpose of preserving an appropriate balance between the demand by residents for park and recreational facilities and the availability of such park and recreational facilities. This article also precludes residential development that would impose an excess demand on such facilities.

Development of parks in the city will require the construction of park and recreation facilities sufficient to provide two acres of such facilities per 1,000 population in the city. Fees paid shall be placed in a special fund to be known as the "Park Acquisition and Development Fund." Moneys in this fund shall be expended for the acquisition, construction, and renovation of park and recreation facilities. In the event the city meets the standard of two acres of such facilities per 1,000 population and will meet such criterion following all developments for which fees have been collected, any moneys remaining in the fund may be used for renovation of the city's existing parks.

5.15.1.2 EXISTING CONDITIONS

The Santa Ana Parks, Recreation, and Community Services Agency is responsible for delivering a variety of services to the community that includes recreation programs, parks, libraries, and operations of the Santa Ana Zoo. Currently, approximately 342 acres are developed as park space. The parks in the city range from 0.2 acres to 65.3 acres, and each provides varied amenities and facilities, such as playgrounds, shelters, picnic tables, sports fields, drinking fountains, restrooms, and parking (Santa Ana 2020).

Santa Ana's public park and recreation facilities are distributed generally uniformly throughout the city. However, the city does not meet the municipal code requirement of two acres of parkland per 1,000 residents (Ono 2020). Little current or future potential exists for the acquisition of additional park lands and open spaces, both because the city is almost fully developed and because demands on capital funds are highly competitive (Santa Ana 2010). However, in addition to parks and open space areas, the city also has recreational facilities and programs, trails, joint-use parks, and nearby regional recreation areas, as detailed below, which contribute to providing residents with recreational facilities.

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Parks and Open Space Areas

Existing Parks

The City owns and/or operates 44 parks and proposes to construct two additional parks. The City's current inventory of parks and recreational facilities is listed in Table 5.15-2 and shown on Figure 5.15-1, *Parks and Trails*.

Table 5.15-2 Public Parks Inventory

Park	Location	Acreage	Amenities
17th Street Triangle Park	2125 West 17th Street	0.70	Bike trail
Adams Park	2302 South Raitt Street	5.68	Ball diamonds, basketball courts, concession stand, multipurpose field, multipurpose court, playground (tots/youth), parking spaces/ handicapped parking, picnic tables, picnic shelters, restroom, sports field lighting
Angels Community Park	914 West 3rd Street	1.60	Ball diamonds, basketball courts, concession stand, multipurpose field, multipurpose court, playground (tots/youth), street parking, picnic tables
Birch Park	210 North Birch Street	2.37	Santa Ana Senior Center, concession stand, parking structure, picnic shelters, outdoor exercise equipment, restroom
Bomo Koral Park	900 West MacArthur Boulevard	10.40	Ball diamonds, drinking fountain, multipurpose field, parking stalls, picnic tables
Cabrillo Park	1820 East Fruit Street	7.60	Ball diamonds, drinking fountain, multipurpose field, parking stalls, picnic tables, restroom
Carl Thornton Park	1801 West Segerstrom Avenue	32.70	Barrier-free playground, ball diamonds, bike trail, multipurpose field, parking stalls, hiking/exercise trail, drinking fountain, playground, lake
Centennial Park	3000 West Edinger Avenue	65.26	Ball diamond, basketball courts, drinking fountain, multipurpose field, parking stalls, playground, picnic tables, restroom, sports field lighting, picnic shelters
Cesar Chavez Campesino Park	3311 West 5th Street	6.48	Ball diamond, basketball courts, drinking fountain, multipurpose field, parking stalls, playground, picnic tables, restroom, handball courts
Chepa's Park	1009 North Custer Street	0.41	Basketball court, drinking fountain, playground, benches, restroom, handball courts, street parking
Colonel William W. Eldridge Park	2933 North Fallbrook Drive	1.20	Street parking
Delhi Park	2314 South Halladay Street	9.94	Ball diamond, basketball courts, drinking fountain, multipurpose field, parking stalls, playground, restroom, handball courts
Edna Park	2140 West Edna Drive	3.56	Hiking/exercise trail, ball diamond, drinking fountain, multipurpose field, parking stalls, playground, picnic tables, restroom
El Salvador Center Park	1825 West Civic Center Drive	8.91	Ball diamond, basketball courts, concession stand, drinking fountain, multipurpose field, parking stalls, playground, picnic tables, restroom, handball courts, swimming pool (El Salvador Center), community garden
Fairview Triangle Park	1100 South Fairview Street	0.74	Bike trail, passive area
Fisher Cabin Park	2501 North Flower Street	2.58	Hiking/exercise trail, drinking fountain, street parking, playground, restroom, log cabin

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Table 5.15-2 Public Parks Inventory

Park	Location	Acreage	Amenities
French Park	901 North French Street	0.21	Benches, street parking
Friendship Park	2210 West Myrtle Street	0.10	Playground, street parking
Garfield Exercise Park	902 North Brown Street	0.10	Exercise equipment, street parking
Heritage Park	4812 West Camille Street	6.44	Ball diamond, drinking fountain, multipurpose field, parking stalls, playground, picnic tables, restroom
Jerome Park	726 South Center Street	19.27	Ball diamond, basketball courts, drinking fountain, gymnasium, handball courts, multipurpose field, parking stalls, playground, picnic tables, restroom, swimming pool (Jerome Center), community garden
Lillie King Park	500 West Alton	10.40	Drinking fountain, multipurpose field, parking stalls, playground, picnic tables
Mabury Park	1801 East Fruit Street	5.46	Drinking fountain, street parking, playground, picnic tables, picnic shelters
Madison Park	1528 South Standard Avenue	6.04	Ball diamonds, basketball courts, concession stand, multipurpose field, multipurpose court, playground (tots/youth), parking spaces/ handicapped parking, picnic tables, restroom
Maple and Occidental Park	Corner of Maple and Occidental Street	0.96	Drinking fountain, exercise equipment
Mariposa Park (6th and Lacy Park)	720 East 6th Street	0.43	Skate elements, drinking fountain, playground
McFadden Triangle Park	630 South Susan Street	0.77	Bike trail, passive areas
Memorial Park	2102 South Flower Street	16.30	Ball diamond, basketball courts, drinking fountain, handball courts, multipurpose field, parking stalls, playground, picnic tables, restroom, swimming pool (Memorial Center), exercise equipment
Memory Lane Park	1560 West Memory Lane	0.56	Hiking/exercise trail, drinking fountain, playground, picnic shelter, bike trail, exercise equipment
Morrison Park	2801 North Westwood Avenue	5.12	Ball diamond, basketball courts, drinking fountain, handball courts, multipurpose field, parking stalls, playground, picnic tables, tennis courts
Pacific Electric Park	Corner of McFadden Avenue and Maple Street	1.41	Drinking fountain, street parking, playground, picnic shelter, restroom, exercise equipment, community garden
Plaza Calle Cuarto Park	325 East Fourth Street	0.20	Restroom
Portola Park	1700 East Santa Clara Avenue	9.07	Ball diamond, basketball courts, drinking fountain, multipurpose field, parking stalls, playground, picnic tables, tennis courts
Riverview Park	1817 West 21st Street	8.33	Ball Diamond, Basketball Courts, Drinking Fountain, Hiking/Exercise Trail, Multipurpose Field, Parking Stalls, Playground
Rosita Park	706 North Newhope Street	8.68	Ball diamond, indoor basketball courts, drinking fountain, gymnasium, multipurpose field, swimming pool (Salgado Center), parking stalls, playground
Saddleback View Park	631 North Patricia Lane	0.92	Drinking fountain, street parking, playground, picnic table, picnic shelters
Sandpointe Park	3700 South Birch Street	7.73	Basketball courts, hiking/exercise trail, multipurpose field, drinking fountain, street parking, playground, picnic table, tennis courts, volleyball

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Table 5.15-2 Public Parks Inventory

Park	Location	Acreage	Amenities
Santa Ana Zoo at Prentice Park*	1801 East Chestnut Avenue	18.75	Playground, picnic tables
Santa Anita Park	300 South Figueroa Street	5.05	Ball diamond, basketball courts, multipurpose field, drinking fountain, playground, parking stalls, restroom, handball courts
Santiago Park	2535 North Main Street	34.57	Ball diamond, archery range, lawn bowling green, log cabin, wildlife and watershed interpretive center, multipurpose field, drinking fountain, playground, parking, restroom, tennis courts, bike trail
Sara May Downie Herb Garden	2405 North Flower Street	0.13	Benches, drinking fountain
Sasscer Park	502 West Santa Ana Boulevard	0.94	
Segerstrom Triangle Park	1000 West Hemlock Way	1.33	
Windsor Park	2915 West La Verne Avenue	10.81	Barrier-free playground, ball diamonds, multipurpose field, basketball courts, parking stalls, drinking fountain, playground, tennis courts, picnic tables, picnic shelter
Total Existing Parkland Acreage		341.99	
Future Parks			
Raitt/Myrtle Park	-	1.09	—
Standard/McFadden Park	-	0.66	—
TOTAL EXISTING AND PLANNED PARKLAND ACREAGE		343.83	

* This facility has limited access to the public.
Source: Santa Ana 2020; Ono 2020.

Centennial Park, the largest of all the city's parks, is in a relatively central position in the city and an important node of open space in the regional system. Grant funding was recently approved to develop two new parks—Raitt/Myrtle Park and Standard/McFadden Park (Ono 2020).

Parks and Open Space by Focus Area

Grand Avenue/17th Street

This focus area includes schools and higher education institutions, such as the Springs Charter School, which includes playfields at its site. There are parcels designated as open space in this focus area, however, there are no parks in this focus area. Parks near this focus area include Portola Park, Mabury Park, and Cabrillo Park.

South Main Street

There are no parks in this focus area, but parks that are within close proximity include Memorial Park, Madison Park, and Delhi Park. All parcels in this focus area consist of developed land.

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55 Freeway/Dyer Road

There are several parcels in this focus area designated as open space, however, they are developed (e.g., railroad, concrete channel). There is one open space parcel that is currently vacant and contains ruderal vegetation. There are no parks in this focus area; Delhi Park is adjacent to it.

South Bristol Street

All the parcels in this focus area are developed. There are no parks in this focus area; however, nearby parks include Sandpointe Park, Bomo Koral Park, Lillie King Park, and Carl Thornton Park.

West Santa Ana Boulevard

This focus area includes the Willowick Golf Course, Cesar Chavez Campesino Park, Angels Community Park, and Spurgeon Park (joint-use school park), which totals approximately 124.4 acres of parkland.

Existing Open Space Areas

In addition to the parks listed in Table 5.15-2, the city has open space areas that serve as additional recreational space for residents. The Santa Ana River and Santiago Creek are part of a regional system of open space corridors promoted by Orange County. In the city, the Santa Ana River extends between State Route 22 (SR-22) to MacArthur Boulevard. This corridor represents 116 acres of open space in the city.

Recreational Facilities

Santa Ana's Parks, Recreation, and Community Services Agency also provides recreational programs, including:

- Youth sports programs for children in pre-kindergarten through eighth grades
- Tennis facilities
- Aquatics programming during the summer months for all ages
- Family PRIDE clubs that allow families to participate in interactive family recreation
- A kayaking program that trains and prepares teens to participate in local, county, state, and national tournaments throughout the year
- A community garden program that offers youth and their families the training and motivation to adopt healthy food habits

The City has about 13.89 acres of sports facilities.

Trails

There are nine existing Class I bike trails in Santa Ana. The following Class I trails are in the plan area and shown on Figure 5.15-1, *Parks and Trails*: Refer to Section 5.16.1.2, *Existing Conditions*, of Chapter 5.16, *Transportation*, which provides definitions of the bikeway classifications.

- **Santa Ana River Bike Trail** extends northeast-southwest along the Santa Ana River.

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- **Santiago Creek Bike Trail** extends east-west along Santiago Creek.
- **Pacific Electric Bike Trail** extends north-south along Maple Street.
- **Alton Avenue Bike Trail** begins in Delhi Park and extends northeast-southwest to Alton Avenue. The trail then extends east-west along Alton Avenue.
- **Raitt Street Bike Trail** extends north-south in two separate sections along Raitt Street.
- **Greenville Street Bike Trail** extends north-south along Greenville Street.
- **Bear Street Bike Trail** extends north-south along Bear Street. The trail begins in Thorton Park.
- **Flower Street Bike Trail** extends north-south along Flower Street.
- **MacArthur Boulevard Bike Trail** extends east-west along MacArthur Boulevard.

Class II bike lanes exist on Bristol Street between McFadden Avenue and Civic Center Drive, and on Memory Lane between Flower Street and Bristol Street.

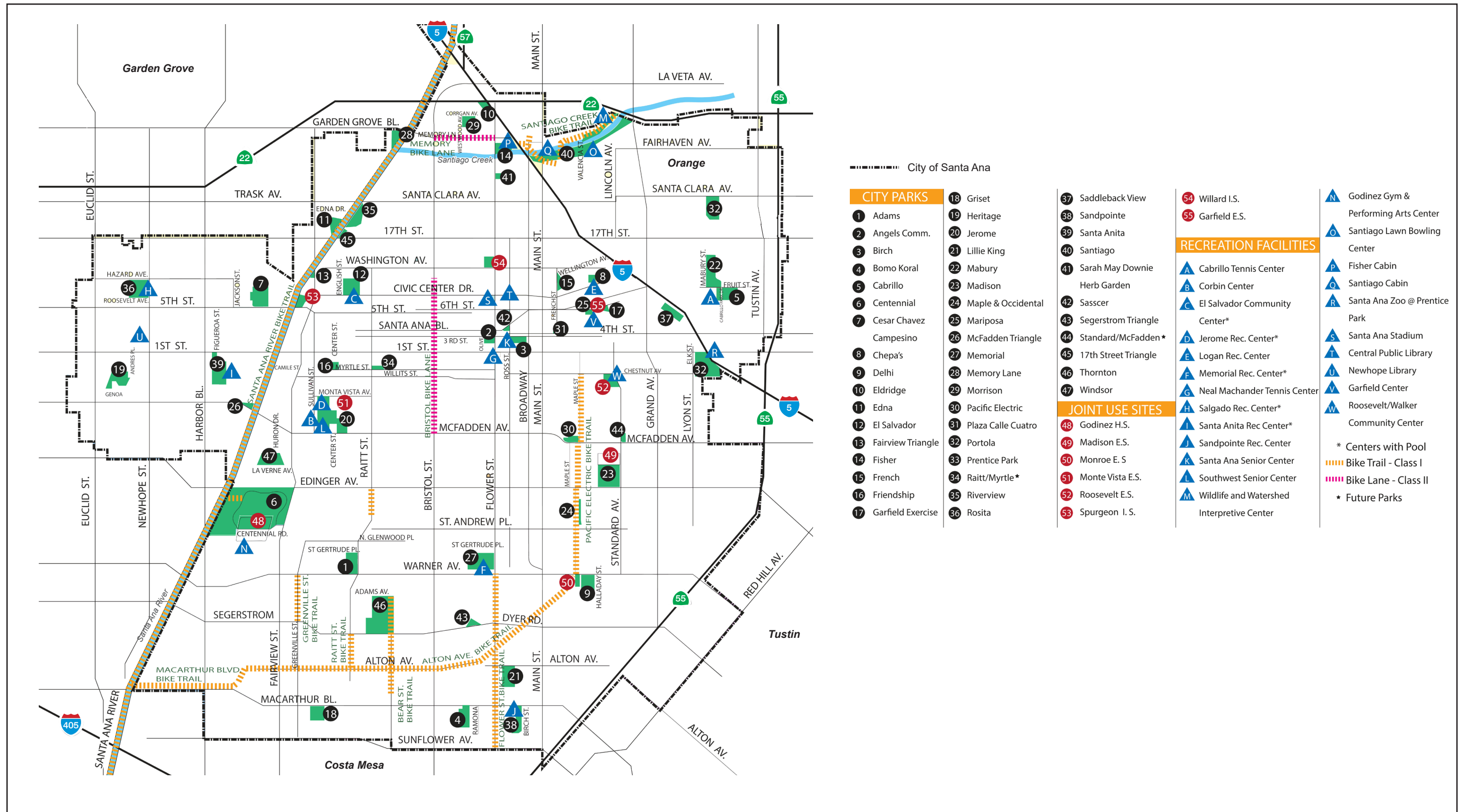
The city also has hiking trails in Sandpointe Park, Fisher Cabin Park, Riverview Park, Edna Park, Memory Lane Park, and Thornton Park.

There is a total of 36.89 acres of hiking trails and bike trails in the city (CSLS 2020).

Joint-Use School Parks

The City has a long-standing agreement with Santa Ana Unified School District (SAUSD) for joint use of district school recreational facilities by the public. The City currently has joint agreements with eight schools. The school facilities include athletic fields, performing arts centers, gymnasiums, auditoriums, swimming pools, and parking. Though these facilities are mainly for educational purposes during school hours, they are open to the public for recreational use after hours, during the summer, and on the weekends. Locations of these joint-use school parks are shown on Figure 5.15-1, *Parks and Trails*. Although not owned or maintained by the City, the recreational areas of the SAUSD schools are also applied to meeting the City's park standard. Therefore, it is assumed that the 42.64 acres of SAUSD school playfields is credited toward meeting the City's parkland standard.

Figure 5.15-1 - Parks and Trails



Source: City of Santa Ana Parks, Recreation, and Community Services Agency, 2020 (Santa Ana, 2020)

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Scale (Miles)



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Nearby Regional Recreation Areas

The following regional recreation areas are near the plan area and accessible to its residents and visitors:

- **Mile Square Regional Park.** Located on a 640-acre block bounded by Edinger Avenue, Euclid Avenue, Warner Avenue, and Brookhurst Street in Fountain Valley, near the southwest boundary of Santa Ana. Facilities at the park include two lakes, game fields, picnic areas, recreational and cultural center, a clubhouse, golf course, archery range, and radio-controlled airplane field.
- **Irvine Regional Park.** Located to the northeast of Santa Ana at 1 Irvine Park Road in the City of Orange, facilities at this park include tables and barbeques, parking, restrooms, paved bicycle/walking trail, six playgrounds, four softball fields, two horseshoe pits, a lake, and an equestrian trail.
- **Willowick Golf Course.** Located on the west side of the Santa Ana River is a 100-acre golf course owned and operated by the City of Garden Grove. The golf course has the highest usage of all courses in the county.
- **Fairview Regional Park.** Located at 2500 Placentia Avenue in Costa Mesa, southwest of Santa Ana. This park covers 210 acres and is developed with a mini railroad, vernal pools, cove chaparral, and open fields for games, gliders, etc.
- In addition, **Newport Beach** and **Newport Harbor** are less than 20 minutes from Santa Ana.

City of Santa Ana Parkland Standard

The Santa Ana Municipal Code establishes a standard of 2 acres of park and recreation facilities per 1,000 residents. Table 5.15-2 identifies the City's 341.99 acres of public parks serving the Santa Ana community. Combining City public parks with the 116 acres of open space area in the Santa Ana River corridor, the City has a total of approximately 457.99 acres of developed public parkland and open space. The City also has 42.64 acres of SAUSD joint-use school park facilities, 36.89 acres of hiking trails and bike trails, and 13.89 acres of sports facilities, for an overall total of 551.41 acres of public parks and recreational resources. Note that this does not include paseos, greenways, the two future parks, or private parks owned and maintained by homeowner associations.

Based on the 2019 estimated population of 334,774 for Santa Ana (see Table 3-5, *General Plan Update Existing and Buildout Population*), the plan area has approximately 1.65 acres of parkland for every 1,000 residents in the city based on the overall public parkland and recreational resources. This is 0.35 acre for every 1,000 residents short of meeting the General Plan standard or deficient approximately 118 acres. Table 5.15-3, *Existing vs. Required Public Parkland and Recreational Facilities Acreage*, quantifies the existing and additional acreage needed to meet the standard.

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Table 5.15-3 Existing vs. Required Public Parkland and Recreational Facilities Acreage

	Santa Ana Plan Area 2019 Population	Parkland Standard (Acres/1,000)	Required Acreage	Existing Acreage	Existing Deficiency
Developed Public Parkland and Recreational Resources	334,774	2	669.55 acres	551.41 acres	118.14 acres

Source: PlaceWorks 2020.

Funding

The City's General Fund is used to maintain park sites in the city. Improvement funding predominantly comes from federal/state grants, Community Development Block Grants (CDBG), or Park Residential Development Fees (Acquisition and Development fees) (Ono 2020).

Park Deficient Areas

As quantified above, the City has not achieved its 2.0 acres per 1,000 residents standard. The City's current ratio is 1.65 acres per 1,000 and the existing deficiency of approximately is 118 acre based on a combination of public parkland and recreational resources. The City also evaluates the park deficiency by geographic subareas. Figure 5.15-2, *Public Park Deficient Areas* highlights the areas characterized by a lack of City public parks. Park size and service area criteria are used to identify the deficient areas:

- A ½ mile area service radius is assumed for parks larger than 5 acres
- A ¼ mile area service radius is assumed for pocket parks less than 5 acres

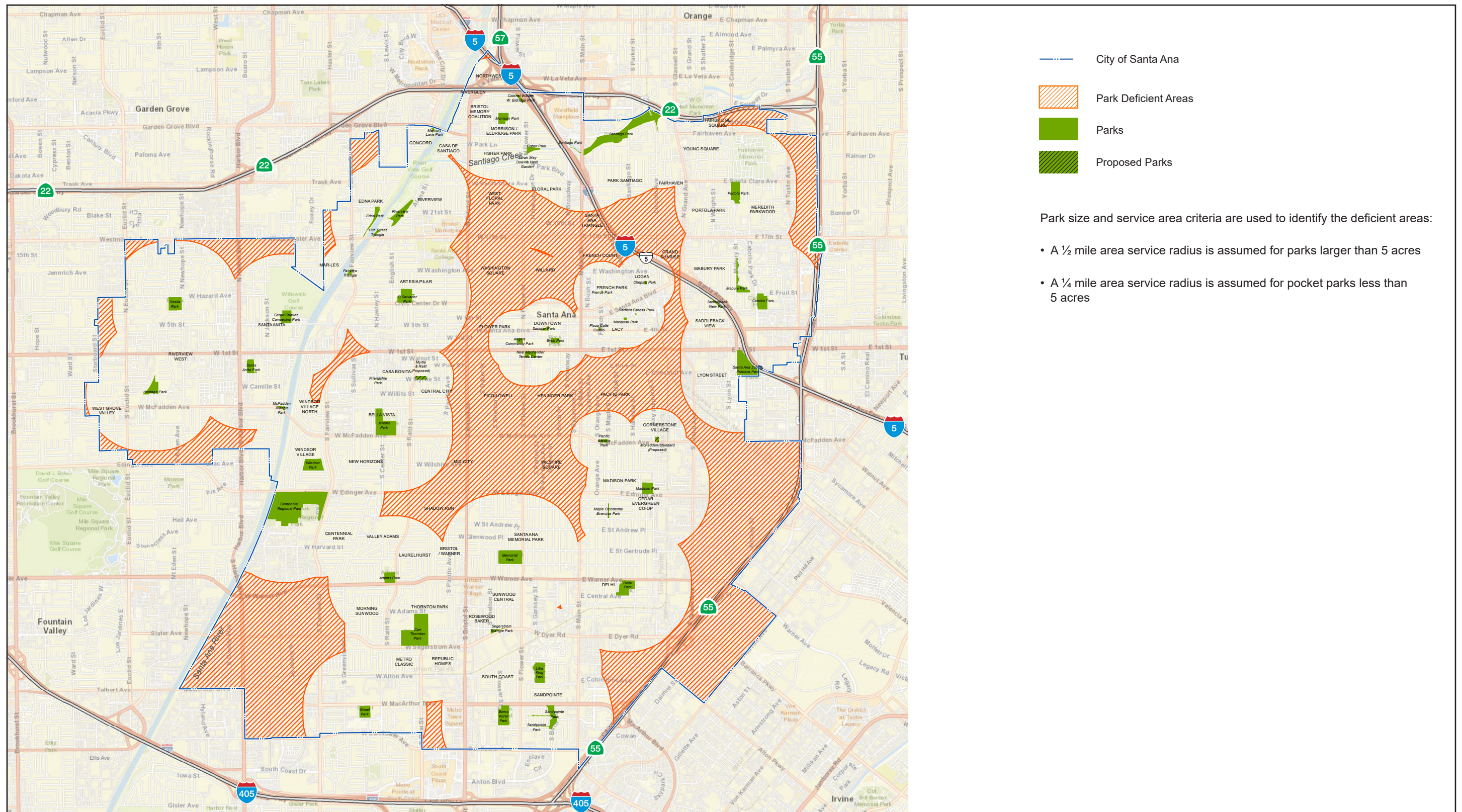
Public park deficient areas have also been mapped relative to the GPU Focus Area boundaries and environmental justice areas as defined by CalEnviroScreen (CES) composite scores greater than 75 percent (see Section 4.4, *Environmental Justice Areas* and Appendix A-b *Environmental Justice Background and Analysis*). These relationships are shown in Figure 5.15-3, *Public Park Deficiency with Overlays*.

5.15.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

- R-1 Would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- R-2 Includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Figure 5.15-2 - Public Park Deficient Areas



Source: City of Santa Ana, 2021

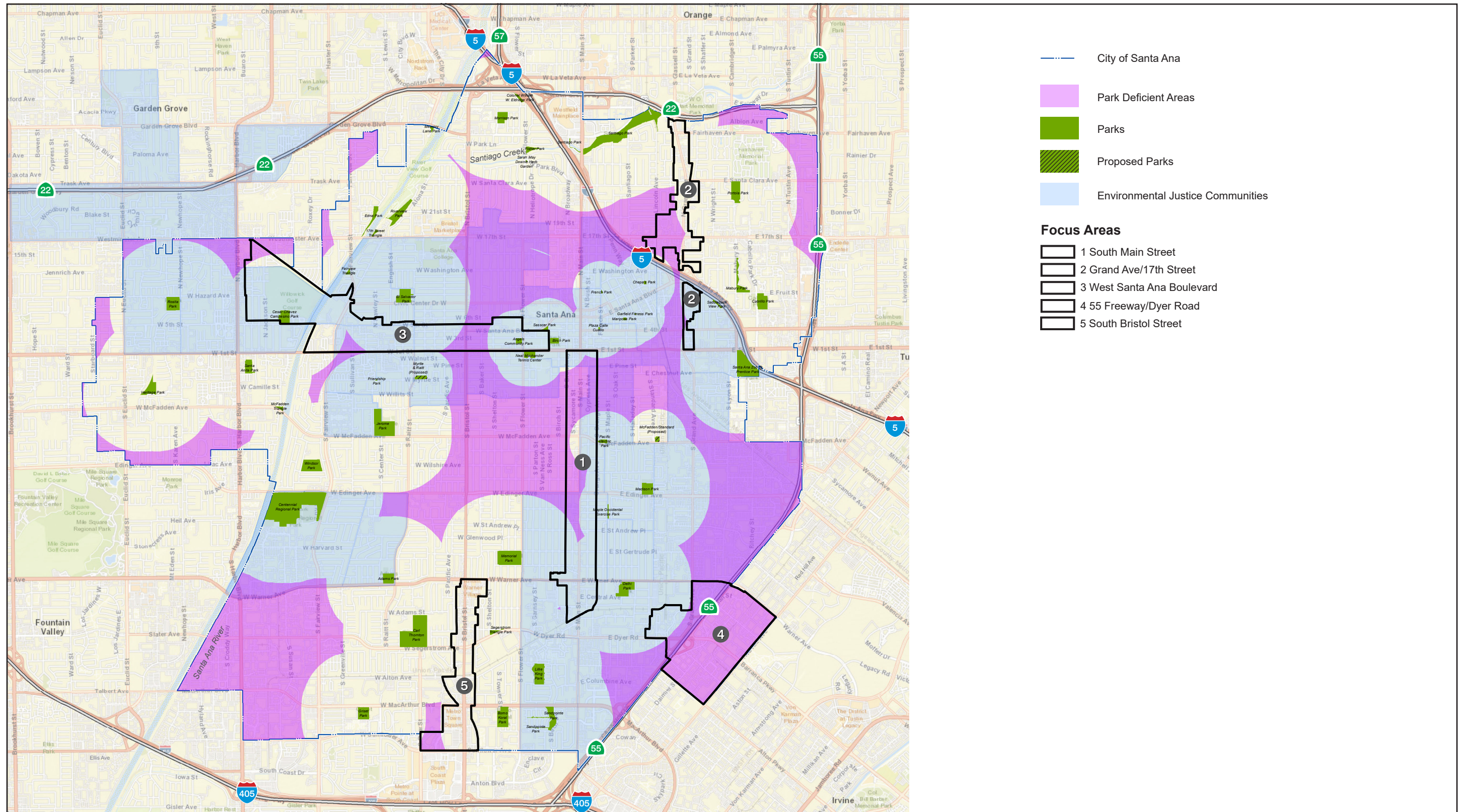


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Figure 5.15-3 - Public Park Deficiency with Overlays



-  City of Santa Ana
-  Park Deficient Areas
-  Parks
-  Proposed Parks
-  Environmental Justice Communities

Focus Areas

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

0  1
Scale (Miles)



Source: City of Santa Ana, 2021

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5.15.3 Regulatory Requirements and General Plan Policies

5.15.3.1 REGULATORY REQUIREMENTS

- RR REC-1 Residential development associated with the General Plan Update will be required to comply with the provisions of the Municipal Code Chapter 35, Article IV (Residential Development Fee). Residential development is mandated to pay fees, dedicate land in lieu thereof, or a combination of both for the purpose of preserving recreational facilities in the City.
- RR REC-2 As a condition of approval of a final subdivision map for any subdivision containing more than fifty (50) parcels proposed for residential use, subdividers may be required to dedicate land for recreational purposes in accordance with Chapter 34, Article VIII (Regulations for Dedication of Land for Park or Recreational Purposes) of the City's Municipal Code. Dedication of land shall promote the general standard of providing two acres of property devoted to parks and recreational purposes for each thousand persons residing within the City of Santa Ana.

5.15.3.2 GPU POLICIES AND IMPLEMENTATION ACTIONS

The following are relevant policies and implementation actions of the Santa Ana General Plan Update, which may reduce recreation impacts. Policy and implementation action revisions since the Draft PEIR are shown in track changes. Note that implementation actions were not listed at all in the Draft PEIR and have been added to more fully describe GPU components that will mitigate impacts. Note that only new implementation measures since the DPEIR public circulation have been highlighted. The track changes as shown below reflect the changes since the Draft PEIR was publicly circulated on August 3, 2020. The comprehensive, track changes listing of Policies and Implementation Actions in Appendix B-a show the changes since October 2020, when the GPU was presented to the Planning Commission. With the changes as marked, both versions represent the most up-to-date GPU Policies and Implementation Actions.

Community Element

Goal 1: Provide opportunities for public and private recreation and cultural programs that meet the needs of Santa Ana's diverse population.

- **Policy 1.1 Access to Programs.** Provide and maintain access to recreational and cultural programs [to serve residential areas. Prioritize the provision of programs for residents living within park deficient or environmental justice areas.](#)
- **Policy 1.2 Community Input.** Engage residents and community facility users to provide input for facility improvements and programming.
- **Policy 1.3 Equitable Programs.** Encourage [recreational and](#) cultural programs and activities of local interest that are inclusive and affordable to all.

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- **Policy 1.4 Shared Use.** Expand community activities and programs ~~at City facilities and throughout the community provided~~ through shared use or cooperative agreements ~~at City facilities or partner sites~~.
- **Policy 1.5 Equitable Recreational Spaces.** Promote the development and use of municipal buildings, indoor facilities, sports fields, and outdoor spaces for recreation that serve residents throughout the City, ~~with priority given to areas that are underserved and/or within environmental justice area boundaries~~.
- **Policy 1.6 Recreation on Private Property.** Promote the development and use of privately-owned recreation and entertainment facilities ~~that are affordable that help and~~ meet the needs of Santa Ana residents.
- **Policy 1.7 Connections to Facilities.** Support efforts to connect residents and visitors to local and regional cultural, educational, and natural environments.
- ~~P~~
- **Policy 1.8 Developer Involvement.** Promote developer participation in the provision of community facilities to meet the recreational needs of residents.
- **Policy 1.10 Community Attractions.** Incorporate placemaking elements and technology into existing and new parks and facilities to encourage use of public spaces, access to educational resources and community led activities.
- **Policy 1.11 Program Incentives.** Incentivize use of privately owned property to promote recreation, health, wellness, and art and culture programs.
- **Implementation Action 1.1. Engage EJ communities on recreation and cultural programs.** Incorporate community stakeholders from environmental justice communities into existing and/or new ad hoc committees to guide the identification of recreational and cultural programming needs and desires.
- **Implementation Action 1.2. Community Conversation.** Plan for and conduct a community survey every three years related to community health, air quality concerns, parks, and community service needs, with focused outreach to environmental justice priority areas.
- **Implementation Action 1.4. Community Coordination on Underutilized Spaces.** Coordinate with community residents, property owners, and other stakeholders to identify vacant and potentially underutilized properties and strategize how such properties could be repurposed into public parks or commercial recreation facilities.
- **Implementation Action 1.5. Alternative Facilities.** In park deficient and environmental justice areas, identify facilities that are viable alternatives to public parks and municipal facilities for recreational, cultural, and health and wellness programs, including but not limited to school facilities, facilities of faith-based and civic organizations, and privately owned recreation and entertainment facilities. Identify, inventory, and rank

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other resources for potential park system acquisition, expansion to existing parks, and/or parks development opportunity within the community.

- **Implementation Action 1.6. Program Accessibility.** To ensure residents of environmental justice area boundaries have access to recreational, cultural, and health and wellness programs, establish accessibility corridors that provide attractive, comfortable, and safe pedestrian and bike access to public recreational facilities in the Parks Master Plan (an implementation action of the Open Space Element). Identify public realm improvements needed to create these accessibility corridors. Prioritize investments for accessibility corridors in the city's capital investment program; include investments for accessibility corridors when investments are made in new parks and recreation facilities within environmental justice area boundaries.
- **Implementation Action 2.1. Facilities to Support Lifelong Learning.** For areas in park deficient and environmental justice areas, conduct, maintain, and publicize an inventory of public, nongovernmental, and private facilities that can be used by organizations to support early childhood education, after school activities, libraries and learning centers, and other meetings and educational opportunities.
- **Implementation Action 3.7. Public Health and Wellness Collaboration Summit.** Collaborate with health care providers, health and wellness advocates, and other public health stakeholders to identify ways to improve the provision of and access to health and wellness services throughout the city. Include a discussion on areas within environmental justice area boundaries and other areas underserved by parks, programs and services that support health and wellness.

Land Use Element

Goal 1: Provide a land use plan that improves quality of life and respects our existing community.

- **Policy 1.3 Equitable [Creation and Distribution of Open Space](#).** Promote the creation of new open space and community serving amenities in park deficient areas [that keeps pace with the increase in multi-unit housing development, with priority given to those that are also within environmental justice boundaries](#).
- **Policy 1.9 Public Facilities and Infrastructure.** Evaluate individual new development proposals to determine if the proposals are consistent with the General Plan, and to ensure that they do not compound existing public facility and service deficiencies.

Goal 2: Provide a balance of land uses that meet Santa Ana's diverse needs.

- **Policy 2.9 Open Space Needs.** [Establish and maintain public ~~Provide sufficient~~ open space and recreation⁴ and recreation requirements for new residential and nonresidential uses to provide sufficient open space and recreational](#) opportunities for Santa Ana Residents and visitors.

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Goal 4: Support a sustainable Santa Ana through improvements to the built environment and a culture of collaboration.

- **Policy 4.9 Recreational Amenities.** Encourage public, private, and commercial recreational facilities in areas that are park and open space deficient.
- **Implementation Action 2.10. Open Space Requirements.** Evaluate public open space and park requirements in the zoning code for residential and nonresidential uses. Consider requirements and/or incentives to aggregate public open space areas required by two or more uses to form larger and more usable areas and facilities.
- **Implementation Action 4.5. Open Space Acquisition Funds.** Partner with community organizations to identify opportunities for and pursue grants to fund the acquisition of additional open space and community space in underserved areas, as identified in the parks needs assessment / parks master plan.

Open Space Element

Goal 1: Provide an integrated system of accessible parks, recreation facilities, trails, and open space to serve the City of Santa Ana. safe, accessible, sustainable, and diverse park and facility system with recreational opportunities accessible to all residents.

- **Policy 1.1 Park Master Plan.** Create and regularly update a citywide parks master plan to provide guidance for the acquisition, development, maintenance and programming of parks, recreation facilities, trails and open space to meet community needs. ~~maintain a Santa Ana parks master plan that incorporates data on need, demographics, and health outcomes.~~
- **Policy 1.2 Parks and Recreation System-Network.** ~~Support~~ Establish a comprehensive and integrated network of parks, ~~open space, and~~ recreational facilities, trails and open space that ~~maintains and~~ provides a variety of active and passive recreational opportunities, ~~that meets the needs of all Santa Ana residents, regardless of age, ability, or income.~~
- **Policy 1.3 Park Standard.** Establish and maintain public open space and recreation requirements for new residential and nonresidential development to provide sufficient opportunities for Santa Ana residents and visitors. ~~Strive to attain~~ Achieve a minimum of two acres per 1,000 residents in the City.
- **Policy 1.4 Park Distribution.** Ensure the City residents have access to public or private parks, recreation facilities, or trails within a 10 minute walking and biking distance of home. Prioritize park provision, programs, and partnerships in park deficient an environmental justice areas.
- **Policy 1.5 Park and Open Space Types.** Provide a mix of community, neighborhood, and special-use parks, along with greenway corridors, natural areas, and landscape areas, to meet community needs for greenspace, recreation space, social space, and trail connectivity.

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- **Policy 1.64 Park Access and Connectivity.** Create a Safe Routes to Parks program that eEstablishes and enhances options for residents to access to existing and new park and recreation facilities through safe walking, bicycling, and transit routes.
- **Policy 1.7 Trail Connectivity.** Collaborate with other City agencies, partners, and regional entities to provide, and connect regional and local trails, travelways, and access corridors to support recreation, active transportation, and park and program access. Consider greenways along the OC Streetcar route, flood control channels, and other underutilized sites.
- ~~Policy 1.5 Development Amenities. Ensure all new development provides open space and effectively integrates pedestrian and multi-modal travelways to promote a quality living environment.~~
- ~~Policy 1.7 Community Building. Ensure that park facilities and programs reflect the priorities of residents in the surrounding neighborhoods, with attention to place-making elements that foster social interaction and community pride such as art, landscape, monuments, murals, play equipment, and seating.~~
- **Policy 1.8. Land Acquisition and Equitable Distribution.** Explore options for the acquisition of available lands for parks, open space, greenways, and trail corridors with priority given to sites that are within park deficient or environmental justice areas.
- ~~Policy 1.8 Creative Solutions. Develop creative and flexible solutions to create infill parks in neighborhoods where traditional pocket, neighborhood, and community parks are not feasible.~~ **Policy 1.59 New Development Amenities.** Ensure all new development provides open space and effectively integrates parks, open space, and park deficient and environmental justice areas, prioritize the creation and dedication of new public parkland over the collection of impact fees, pedestrian and multi-modal travelways to promote a quality living environment
- **Policy 1.108 Creative Solutions for Deficiencies.** Develop creative and flexible solutions to create infill parks in neighborhoods where traditional pocket, neighborhood, and community parks are not feasible. Provide greenspace and recreation activities in neighborhoods where traditional parks are not feasible. Encourage public, private, and commercial recreational facilities in areas that are park deficient.
- **Policy 1.119 Funding Sources.** Explore and pursue all available funding, including nontraditional funding sources, for parkthe acquisition, facility development, of parkland, the development of park facilities, programming, and maintenance of existing and new parks. Set aside park funding to have monies on hand to acquire and develop parkland when opportunities arise and to leverage grant options, including nontraditional finding sources.
- **Policy 1.120 Shared Use.** Collaborate with school districts, faith-based communities, and community serving organizations to expand shared use facilities through cooperative agreements, to maximize recreation options, as well as pursuing multiple use strategies of publicly owned land.
- ~~Policy 1.11 Accessibility. Design new and renovated existing parks, recreation facilities, and trails to provide access to residents of all physical abilities.~~

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[\[OS Policy 1.11 moved to OS Policy 2.14\]](#)

- ~~**Policy 1.12 Neighborhood Needs.** Consider unique neighborhood needs in the development of open spaces and programs.~~

Goal 2: Provide a system of parks, open spaces, and community centers that are well-maintained, safe, and health environments for all users, welcoming, inclusive, safe, and healthy parks, recreation facilities, and activities to serve Santa Ana residents regardless of age, ability, or income.

- **Policy 2.1 Recreation Variety.** Provide a variety of recreation facilities and activities to meet the diverse needs of the community. Consider needs for indoor and outdoor recreation opportunities, as well as traditional and trending activities.
- **Policy 2.2 Healthy Parks and Public Spaces.** Invest in and activate parks, recreation facilities and greenspace to support active lifestyles, mental health, youth development, lifelong learning and environmental health benefits that support individual and community wellbeing.
- **Policy 2.3 Active Lifestyles.** Invest in parks, trails and programs that support sports, fitness, active transportation, and active lifestyles.
- **Policy 2.6 Connections to Nature.** Design and develop parks, greenspace, and trail corridors to support community respite, wellness, and the mental health benefits found in connections to nature.
- **Policy 2.7 Healthy Indoor Options.** Encourage or incentivize new commercial and residential development to provide private indoor recreation space when located in areas with high levels of localized air pollution or if site is adjacent to freeways or heavy industrial uses.
- **Policy 2.8. Hazardous Materials.** Reduce or eliminate, where feasible, the use of pesticides and herbicides that negatively impact human health at park facilities and publicly accessible open spaces.
- **Policy 2.9 Safety Through Design.** Create a safe environment through implementation of Crime Prevention through Environmental Design (CPTED) principles in public spaces.
- **Policy 2.10 Safe Use.** Ensure the safety of park visitors and usability of facilities through facility upkeep, landscaping maintenance, surveillance, recreation and social service programs, and partnerships with public and private entities that address public safety and related issues in parks.
- **Policy 2.11 Neighborhood Engagement. Community Involvement and Volunteerism.** Encourage residents, stakeholders, neighborhood groups, businesses, schools, social organizations, and public agencies to volunteer and partner in the development, maintenance and activation of publicly-owned parks and recreation facilities.
- **Policy 2.12 Park and Facility Character.** Ensure that parks and recreation facilities incorporate placemaking elements that foster social connections and community pride such as art, landscaping, murals, and amenities and facilities that reflect site character and local needs.

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- Policy 2.13 Neighborhood Needs. Consider unique neighborhood and demographic needs in the development of local parks, open spaces, and programs. Balance these unique needs with efforts to ensure affordability and serve residents citywide.
- Policy 2.14 ADA Accessibility. Design new and renovate existing parks, recreation facilities, and trails to provide access to residents of varying abilities, including people with special needs.
- Policy 2.15 Inclusive, Affordable Recreation. Provide parks, recreation facilities and programs that reflect the different demographics of the Santa Ana community, including diverse races, ethnic groups, identities, family configurations, abilities, and incomes.
- ~~Policy 2.2 Neighborhood Engagement.~~ Encourage residents, neighborhood groups, businesses, schools, organizations, and public agencies to partner in the creation and maintenance of safe and well-maintained publicly-owned park and recreation facilities.
- ~~Policy 2.4 Urban Forest.~~ Maintain, preserve, and enhance the City's urban forest as an environmental, economic, and aesthetic resource to improve residents' quality of life.
- ~~Policy 2.6 Facility Maintenance.~~ Ensure all park facilities and open spaces are well maintained.

Goal 3: Maintain and manage parks, recreation facilities, trails, and open space to sustain city assets and support safe use. Preserve, expand, and create additional open space areas and linkages throughout the City to protect the natural and visual character of the community, and to connect to local and regional activity centers.

~~Policy 3.1 — Recreational Corridors.~~ Establish and maintain an integrated recreational and multi-modal commuter corridor network linking open spaces, housing, community services, and employment centers.

~~Policy 3.2 — Linking Development.~~ Promote bicycle and pedestrian linkages and amenities throughout new and existing development to promote use of alternative modes of transportation and active lifestyles.

~~Policy 3.3 — Publicly Owned Land.~~ Maintain and explore options for publicly owned land for the creation of open space pathways and corridors.

~~Policy 3.4 — Greenway Corridors.~~ Coordinate with government and private sector to explore opportunities to incorporate pedestrian, multi-modal, and landscape amenities along the OC Streetcar route, flood control channels, and other underutilized sites.

- Policy 3.1 Park and Facility Maintenance. Ensure all parks, recreation facilities and open spaces are well maintained.
- Policy 3.2 Maintenance Resources. Ensure that funding, staffing, and other resources are available to maintain existing parks and facilities, as well as new ones when added to the park and open space system.

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- [Policy 3.3 Asset Management. Ensure that funding is earmarked for the repair, replacement, and renovation of old or worn amenities, facilities and landscaping in parks when needed or at the end of their lifecycles. This would include deferred maintenance and new capital projects.](#)
- **Policy 3.68 Naturalizing the Santa Ana River.** Explore opportunities to reintroduce natural habitat along the Santa Ana River to provide natural habitat and educational and recreational opportunities.
- **Implementation Action 1.1. Park Needs Assessment and Master Plan.** Create, adopt, and implement a park needs assessment and master plan defining park service areas according to best practices, establishing a service area for each park facility, creating a tool to evaluate needs and prioritize improvements by quadrant or appropriate geographic subarea, and maintaining a list of priorities for the expansion and improvement of open space and recreational facilities in each quadrant or geographic subarea. to attain a park land standard of 2 acres per 1,000 residents.
- [Implementation Action 1.2. Interagency Forum. Convene an interagency forum to take a coordinate approach to evaluating the feasibility for converting City-owned properties to parkland, with special focus in park deficient and environmental justice areas.](#)
- [Implementation Action 1.3. Annual Open Space Summit. Convene an annual forum to bring together City interagency staff, community leaders, and private enterprise to establish goals for park acquisition and review a status report of metrics associated with progress.](#)
- **Implementation Action 1.4. No-net-loss of Parkland.** Establish land use provisions in the Municipal Code that prevent a net loss of public parkland in the city. Require at least a 1:1 replacement if there is any loss of public parkland due to public or private development.
- [Implementation Action 1.5. -Park Opportunity Fund. Incorporate General Funds, cannabis revenues, and private donations into an established Park Opportunity Fund to leverage for matching grants and have monies available when opportunities arise for new park acquisition.](#)
- **Implementation Action 1.6. Development Fees.** Evaluate the fees required by the City's Residential Development Fee Ordinance and adjust them to better reflect current costs and needs. Update requirements regarding where fees are spent.
- **Implementation Action 1.7. Public Parkland Requirements for Larger Residential Projects.** Update the Residential Development Fee Ordinance for Larger Residential Projects to require public parkland within a 10-minute walking distance of the new residential projects. Consider allowing developers a reduction in on-site open space by giving credits for park development or the provision of private park land. Incentivize the creation of public parks that exceed City requirements, especially within park deficient and environmental justice areas. Establish incentives for coordination between two or more residential projects (of any size) to create larger and/or more centralized public park space., such as exploring housing density bonus options for the provision of open space as a public benefit and leverage Residential Development fee to partner with developers to create public open space.

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- **Implementation Action 1.8. Park Foundation.** Establish a 501(c)(3) Parks and Recreation Foundation to establish fundraising support for Santa Ana’s park system. Identify communication protocols, roles and responsibilities, and bylaws.
- **Implementation Action 1.9. Right-of-Way Use.** Coordinate with public agencies, railroads, and utilities to determine the feasibility of acquiring the use of rights-of-way for restricted use by the public.
- **Implementation Action 1.10. New Parkland.** Coordinate with property owners to explore options to provide public access and programming in park deficient areas, including options to acquire land through purchase, land dedication, easements, and land leases that would allow for permanent or temporary use of land for recreational opportunities.
- **Implementation Action 1.11. Joint-Use Agreements.** Coordinate with public school districts, private schools, and other community organizations to provide community members with access to additional open space and recreational resources.
- **Implementation Action 1.12. Santa Ana River.** Update the Santa Ana River Vision Plan to expand opportunities to reintroduce natural elements, increase habitat, and provide more recreational opportunities.
- **Implementation Action 1.13. New Programming in Underserved Areas.** Partner with community organizations to offer new programs that are accessible to residents who live in areas underserved by open space and recreational facilities. Develop a comprehensive partnership policy providing guidelines that can be used throughout the City organization.
- **Implementation Action 1.14. Community Partnerships.** Continue building partnerships with community-based organizations that administer social services to the elderly, youth, and other special needs groups; create use agreements for these providers to use public park facilities to meet the recreational and educational needs of these groups.
- **Implementation Action 1.15. Community Input.** Identify and utilize multilingual and interactive community engagement tools, initiated through the Parks and Recreation Master Plan, for residents and facility users to provide ongoing input about open space needs, park design, facility improvements, and programming.
- **Implementation Action 2.6. Healthy Indoor Options.** Explore options to incentivize or require the provision of indoor recreation space, particularly in environmental justice areas that experience high levels of exposure to air pollution.
- **Implementation Action 2.8. Public Input.** Establish a procedure to collect community input regarding park design and programming at the beginning of the planning process whenever a new facility is proposed or when redevelopment of an existing facility is under consideration.

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- [Implementation Action 2.9. Hours of Operation.](#) Evaluate hours of operation for parks, community centers, and other facilities. Consider the option to extend hours of operation to meet community needs.
- [Implementation Action 2.10. Evaluate Programming.](#) Evaluate recreational programming through participant service assessment and online public opinion surveys on a periodic basis to identify needed and desired programs.
- [Implementation Action 2.11. Program and Facility Fees.](#) Evaluate program and facility rental fees to ensure that programming is sustainable, and fees are equitable and appropriate.
- [Implementation Action 3.1. Park and Facility Maintenance Resources.](#) Evaluate and identify the funding, staffing and resources needed to provide quality preventative and routine maintenance for existing sites as well as planned parks and facilities.
- [Implementation Action 3.2. Deferred Maintenance.](#) Assess the condition of parks and facilities, identifying deficiencies, repairs and replacements needed, including cost estimates. Include facility improvements in the Capital Improvement Program.
- [Implementation Action 3.3. Asset Management.](#) Forecast and track facility lifecycle to plan for the ongoing needs for park and landscaping renovations and replacement.

Public Services Element

Goal 1: Provide quality and efficient facilities that are adequately funded, accessible, safe, and strategically located.

- **Policy 1.5 Community Benefit.** Collaborate with community stakeholders to expand recreational, educational, cultural opportunities, promote active lifestyles, and maximize community benefit.
- **Implementation Action 1.8. Secondary Use of City-Owned Infrastructure.** Identify City water facilities that can accommodate recreation and/or public art amenities.

Urban Design Element

Goal 3: Create and maintain safe and attractive travelways through coordinated streetscape design.

- **Policy 3.6 Linear Park System.** Support open space improvements along roadways and non-vehicular paths, such as bike or multi-use trails, to [create/connect](#) linear [greenways leading](#) open space [that connect to a network of parks and activity areas throughout the City.](#)
- **Policy 3.7 Natural Recreational Amenities.** Enhance natural and recreational features of Santiago Creek and the Santa Ana River corridors and provide linkages throughout the community.
- **Policy 3.11 Urban Forest.** Create a diverse urban forest with a variety of sustainable trees in medians, parkways, public open space, and private development.

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Goal 4: Create nodes and urban hubs throughout the City to foster community, education, arts and culture, business activities, entertainment, and establish Santa Ana as a vibrant center.

- **Policy 4.3 Activate Open Space.** Ensure architectural and landscape design activates open space, as a means to promote community interaction and enhance the aesthetic quality of development.
- **Policy 4.5 Open Space at Nodes.** Promote creative, multi-purpose public space within nodes, major development projects, and people places.
- **Implementation Action 3.6. Linear Parks and Trails.** Within the parks master plan, address needs for off-street trails, including new linkages and linear park improvements, such as lighting, security features, signage, and enhanced landscaping.

Circulation/Mobility Element

Goal MCE-3: A safe, balanced, and integrated network of travelways for non-motorized modes of transportation that connects people to activity centers, inspiring healthy and active lifestyles.

- **Policy MCE-3.8 Santa Ana River and Golden Loop.** Proactively pursue the improvement and restoration of the Santa Ana River natural habitat and the completion of the Golden Loop to serve as a multi-use recreational amenity.
- **Implementation Action 3.5. Safe Routes to Schools and Parks.** Develop and pursue implementation of a Safe Routes to School Plan and a Safe Routes to Parks Plan.

5.15.4 Environmental Impacts

The following impact analysis addresses thresholds of significance related to recreational facilities. The applicable thresholds are identified in brackets after the impact statement.

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. [Threshold R-1]

The projected increase in population from the General Plan Update would lead to additional demands on parks and recreational facilities in the full buildout scenario. Table 5.15-4, *Existing and Proposed Public Parkland and Recreational Facilities*, outlines the existing and proposed park acreages.

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Table 5.15-4 Existing and Proposed Public Parkland and Recreational Facilities

	Santa Ana Plan Area Population	Parkland Standard (acres per 1,000 resident)	Public Parkland and Recreational Resources (acres)	Deficiency (acres)	Total Acres/ 1,000 residents
Existing Conditions (2019)	334,774	2	551.41 ¹	118.14	1.65
Full Buildout (2045)	431,629		563.78 ²	299.48	1.30

Source: Ono 2020.

Notes:

¹ This does not include the two future parks or private parks owned and maintained by homeowner associations.

² This includes the two future parks but does not include private parks owned and maintained by homeowner associations.

The projected full buildout would result in an estimated population growth of up to 96,855 additional residents. Table 5.15-4, shows the resultant ratio to buildout of the General Plan Update based on existing public parks and recreational facilities in addition to two newly funded parks. Existing and funded parks and recreational facilities would amount to approximately 563.78 acres. Without acquisition of new parkland, population growth related to buildout of the GPU would equate to 1.30 acres per 1,000 residents., which is 0.70 acres below the City's parkland standard.

Without provision of new parks and recreational facilities, buildout in accordance with the GPU, therefore, would exacerbate an existing shortage of recreation facilities. Additional park acres and recreational facilities/community centers would be needed to meet the increasing population demand (Ono 2020). The deficiency would be reduced by park and recreational amenities developed and maintained by the City in addition to private parks and recreational facilities owned and maintained by homeowner associations.

The extent to which the City can plan and implement future planned parks, trails, and other recreational facilities is related to funding availability. As described above, the Quimby Act establishes a funding mechanism for parkland acquisition for all local jurisdictions. Future development in accordance with the General Plan Update would be required to dedicate land or pay in-lieu impact fees per Chapter 34, Article VIII, and Chapter 35, Article IV, of the City's Municipal Code, as well as the Quimby Act. Collected park development impact fees would fund future park acquisition and development and assist the City in achieving the parkland standard of two acres per 1,000 residents. Table 5.15-1 shows the City's current park dedication standard. New residential development, therefore, would be required to meet the City's standards. Park and recreational improvements would also be funded by grants and CDBG funds. Provision of parks under implementation of the GPU, would occur over time.

Although required park fees for development could be sufficient to fund new parks and improvements, there is a lack of available land and lack of land designated as Open Space within the General Plan Update to develop new parks or expand existing facilities. The City of Santa Ana is essentially built-out. The increased demand on existing parks could result in physical deterioration of these resources. Moreover, based on the geographic analysis of park deficiencies in the City, residential development accommodated within the focus areas would be expected to further exacerbate park deficiencies within existing neighborhoods, including disadvantaged environmental justice areas. The lack of existing parks is particularly apparent for the 55 Fwy./Dyer Road focus

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area. The City acknowledges that if new parks are not provided in this area, the increased park demand generated by development in this focus area could spill over to the City of Tustin's parks and recreation facilities resulting in accelerated deterioration.

The extended Community Outreach Program conducted by the City from January through May 2021 culminated in the addition of numerous GPU policies and specific Implementation Actions to address existing park deficiencies and minimize the adverse impact of GPU implementation to parks and open space (as detailed in Section 5.15.3 *Regulatory Requirements and General Plan Policies*). These policies and actions specifically address the park master-planning, distribution of parks, serving disadvantaged communities, timing for park development, facility maintenance, and community input and partnerships. Implementation Action 1.7 requires and update of the Residential Development Fee Ordinance for Larger Residential Project to require public parkland within a 10-minute walking distance of the new residential projects.

The City is also 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 is committed to identifying additional funding sources from new development projects to either procure land for parks or collect in-lieu fees for parks to minimize the potential for impacts on adjacent communities with regards 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.

In summary, compliance with regulatory requirements and implementation of proposed GPU policies and Implementation Actions would reduce the potential impact of the proposed GPU on park facilities and minimize the impact on existing facilities. Given the existing park deficiencies and scale of development in park deficient areas, however, the project's impact would be potentially significant.

Level of Significance Before Mitigation: Potentially significant.

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. [Threshold R-2]

The proposed General Plan Update guides growth and development within the City and is not a development project. However, it is estimated that the General Plan buildout would generate the demand for approximately 564 acres of parkland and recreational facilities assumed to serve the 2045 population. As discussed throughout this section, however, the City is essentially built-out and very limited vacant land is available to be developed with new recreational opportunities. Some undeveloped land could be improved or properties redeveloped to provide residents with new recreational opportunities Parks are also a permitted use under other land use designations (e.g., residential land uses), which could result in the development of recreational facilities outside of park-designated parcels.

Development and operation of new or expanded recreational facilities may have an adverse physical effect on the environment, including impacts relating to air quality, biological resources, lighting, noise, and traffic.

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Environmental impacts associated with the construction of new and/or expansions of existing recreational facilities in accordance with the proposed land use plan are addressed in the respective topical sections of the Draft PEIR (e.g., please see Aesthetics, Air Quality/GHG, Biological Resources, Cultural Resources, Noise, Transportation section of Chapter 5, *Environmental Analysis*) and this Draft Recirculated PEIR. Impacts). Addressing the site-specific impacts of these parks at this time would be beyond the scope of this programmatic EIR. Furthermore, potentially adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and multiuse trails pursuant to buildout of the proposed land use plan would be less than significant upon the implementation of the General Plan Update's goals, policies, and actions and existing federal, state, and local regulations. Subsequent environmental review for future individual park developments would also be required. Although construction and/or expansion of new parks and recreation facilities would be subject to GPU policies and implementation actions; regulatory requirements, and future, project-specific environmental review under CEQA, it is still possible that development of such facilities could result in significant, unavoidable impacts. Consequently, impacts from the General Plan Update relating to new and/or expanded recreational facilities would be potentially significant.

Level of Significance Before Mitigation: Impact 5.15-2 would be potentially significant.

5.15.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.15-2.

Without mitigation, the following impact would be **potentially significant**:

- **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. [Threshold R-1]
- **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. [Threshold R-2]

5.15.6 Mitigation Measures

As described above, GPU Policies and Implementation Actions have been supplemented with specific actions and timing parameters to address parks and open space impacts. No feasible mitigation measures beyond these policies and implementation actions have been identified.

5.15.7 Level of Significance After Mitigation

Impacts 5.15-1 and 5.15-2 would remain significant and unavoidable.

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5.15.8 References

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