### 5.12 Parks and Recreation

#### 5.12.1 INTRODUCTION

Pursuant to the requirements of CEQA, this section of the Supplemental EIR analyzes whether the proposed Project would (1) increase the use of existing parks and recreational facilities such that substantial physical deterioration or degradation of the facilities would occur or be accelerated or that new or expanded facilities would be required; (2) result in substantial adverse construction-related effects associated with the provision of new or physically altered parks and recreational facilities, whether on site or offsite; and/or (3) adversely affect existing recreational facilities. Information within this section is based on the following:

- City of Santa Ana General Plan Update
- City of Santa Ana General Plan Update FEIR
- City of Santa Ana Municipal Code

New housing can result in substantial population growth and the need for additional park and recreation facilities. Because CEQA focuses on physical environmental effects, this section analyzes whether any physical changes resulting from an increase in demands for park and recreation facilities from the proposed Project could result in significant adverse environmental effects. Thus, an increase in use of parks and recreation facilities would not, by itself, be considered a physical change in the environment. However, physical changes in the environment resulting from the construction of new facilities or an expansion of existing facilities to accommodate the increased staff or equipment needs related to substantial physical deterioration could constitute a significant impact. The proposed Project has also been evaluated to determine its consistency with the City's zoning code provisions related to the provision of park and recreation facilities.

#### 5.12.2 REGULATORY SETTING

#### Mitigation Fee Act

The California Mitigation Fee Act, Government Code Sections 66000, et seq., allows cities to establish fees to be imposed upon development projects for the purpose of mitigating the impact that the development projects have upon the city's ability to provide specified public facilities. In order to comply with the Mitigation Fee Act, the city must follow four primary requirements:

- (1) Make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee;
- (2) Segregate fee revenue from the General Fund in order to avoid commingling of capital facilities fees and general funds;
- (3) For fees that have been in the possession of the city for five years or more and for which the dollars have not been spent or committed to a project the city must make findings each fiscal year describing the continuing need for the money; and
- (4) Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

As described below, the City of Santa Ana has adopted a parkland dedication and/or in-lieu fee that is included in the Municipal Code Chapter 35.

#### City of Santa Ana General Plan

The Santa Ana General Plan Update (GPU) includes the following park and recreation objectives and policies that are related to the proposed Project:

#### Land Use Element

- GOAL LU-1: Provide a land use plan that improves quality of life and respects our existing community.
- **POLICY LU-1.3** 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 area boundaries.
- **POLICY LU-1.9** 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 LU-2: Provide a balance of land uses that meet Santa Ana's diverse needs.
- **POLICY LU-2.9** Establish and maintain public open space and recreation requirements for new residential and nonresidential uses to provide sufficient open space and recreational opportunities for Santa Ana residents and visitors.
- **GOAL LU-4:** Support a sustainable Santa Ana through improvements to the environment and a culture of collaboration.
- **POLICY LU-4.9** Encourage public, private and commercial recreational facilities in areas that are park and open space deficient.

#### **Open Space Element**

- GOAL OS-1 Provide an integrated system of accessible parks, recreation facilities, trails, and open space to serve the City of Santa Ana.
- **POLICY OS-1.2** Provide and support a comprehensive and integrated network of parks, recreation facilities, trails, and open space that is diverse, with a variety of active and passive recreational opportunities.
- **POLICY OS-1.3** Establish and maintain public parks, open space, and recreation requirements for new residential and nonresidential development to provide sufficient opportunities for Santa Ana residents and visitors. Attain a minimum of three acres of land per 1,000 persons residing in the City of Santa Ana.
- **POLICY OS-1.4** Ensure that all city residents have access to public parks, recreation facilities, or trails in the City of Santa Ana within a 10-minute walking and biking distance of their homes. Prioritize park provision, programs, and partnerships in park deficient and environmental justice areas.
- **POLICY OS-1.5** 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.

POLICY OS-1.9 Require all new development to provide adequate parks and open space, including via parkland dedication or development fees, in order to meet the City's park standard. Ensure that new development includes pedestrian and multi-modal travelways to promote a quality living environment. For new development within park deficient and environmental justice areas, prioritize the creation and dedication of new public parkland over the collection of impact fees.

#### City of Santa Ana Parks Master Plan

The City of Santa Ana Parks Master Plan was adopted in May 2022. The Parks Master Plan provides guidance and priorities in order to reach the City's GPU policy of 3 acres per 1,000 residents by setting a goal to increase parkland to 1.5 acres per 1,000 residents by 2032 through parkland acquisition. It further recommends improvements, enhancements and a diversity of amenities at existing sites. In addition, the Parks Master Plan provides a cost and investment strategy for the acquisition of new and maintenance of existing parkland.

#### City of Santa Ana Municipal Code

**Section 34-204.** Santa Ana Municipal Code, Section 34-204 sets forth the requirements for the dedication of land for parks and recreational purposes, based on the type of development proposed. For multi-family developments, Section 34-204 requires 0.005 acres or 209.1 SF of land to be dedicated for parks or recreational purposes per dwelling unit.

**Section 35-108.** Santa Ana Municipal Code, Section 35-108 requires that residential development fees be paid for the acquisition, construction, and renovation of park and recreation facilities based on a standard of two (s) acres of public parkland per 1,000 residents. The fees collected shall be placed in a special fund to be known as the "Park Acquisition and Development Fund." Moneys in such fund shall be expended for the acquisition, construction, and renovation of park and recreation facilities.

**Section 35-110.** Santa Ana Municipal Code, Section 35-110 requires that any person adding net residential units or converting apartments to condominiums in the City of Santa Ana shall pay to the City fees in such amounts as shall be set by resolution of the city council. The code section states that the purpose of preserving an appropriate balance between the demand by residents for use of park and recreational facilities and the distinctions in fees with respect to types of residential units are to reflect the differences in the demand for use of public park and recreation facilities.

**Section 35-111.** Santa Ana Municipal Code, Section 35-111 requires that park and recreation related fees for addition of residential units be paid prior to the issuance of a building permit for any construction which adds net residential units. No building permit shall be issued until such fees are paid.

#### 5.12.3 ENVIRONMENTAL SETTING

The City of Santa Ana Parks Master Plan describes that the City has approximately 370.8 acres of developed park and recreational space that ranges in size from 0.1-acre to 65.3 acres within 44 parks; and that the City has plans to construct two additional parks. As discussed in Section 5.10, Population and Housing, the City had a population of 308,459 in 2022. Therefore, the City has approximately 1.2 acres of public park and/or recreational space per every 1,000 residents.

There are no existing parks within the South Bristol Street Focus Area and the southwestern portion of the Project site is located within a park-deficient area as identified in the GPU FEIR. The closest existing park and recreation facilities to the Project site (within two miles) in the City of Santa Ana are listed in Table 5.12-

1. As shown, the City currently has six existing parks that provide 69.48 acres of parkland within two miles of the Project site. Only Bomo Koral Pak (10.40 acres) is within a 10-minute walking distance.

Table 5.12-1: Santa Ana Park and Recreation Facilities Within Two Miles of the Project Site

Park and Address	Amenities	Acreage	Miles from Project Site	Travel Time from Project Site <sup>1</sup>
Bomo Koral Park 900 W. MacArthur Blvd.	Ball Diamonds, Multi-purpose Field, Parking, Picnic tables	10.40 acres	0.5 mile	Driving: 3 minutes Walking: 9 minutes
Sandpointe Park 3700 S. Birch St.	Restrooms, Basketball Courts, Hiking & Exercise Trail, Multi- purpose Field, Playground, Picnic Tables, Tennis Courts, Volleyball	7.73 acre	0.9 mile	Driving: 4 minutes Walking: 18 minutes
Segerstrom Triangle 1000 W. Hemlock Wy	Open space	1.33 acres	0.9 mile	Driving: 5 minutes Walking: 18 minutes
Griset Park 2302 W. MacArthur Blvd.	Multi-purpose Field	6.79 acres	0.9 mile	Driving: 5 minutes Walking: 18 minutes
Carl Thornton Park 1801 W. Segerstrom Ave.	All Access Park, Playgrounds, Ball Diamonds, Bike Trail, Hiking and Exercise Trail, Multi-purpose Field, Drinking Fountain, Lake, Restroom	32.83 acres	1.0 mile	Driving: 5 minutes Walking: 21 minutes
Lillie King Park 498 W. Alton Ave.	Multi-purpose Field, Parking, Playground, Picnic Tables	10.40 acres	1.1 miles	Driving: 5 minutes Walking: 25 minutes
Total Acreage of Parkland		69.48 acres		

Source: City of Santa Ana General Plan and City of Santa Ana Parks, Recreation and Community Services Website, 2019. Accessed April 2023. 1 Per Google Earth.

#### 5.12.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect related to parks and/or recreation if it were to result in:

- PR-1 Substantial adverse physical impacts associated with the provision of new or physically altered park or recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives;
- PR-2 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; or
- PR-3 Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

#### 5.12.5 METHODOLOGY

The analysis below considers the increase in use of parks and recreation facilities that would be generated by the proposed Project in relation to the ability of existing park and recreation facilities to accommodate the increased use. The analysis considers whether an increase in use would result in the substantial physical deterioration of existing recreational facilities, such as accelerated wear on sports facilities and fields, or in the need for new or expanded facilities.

The analysis uses a parkland-to-population ratio to measure demand for recreational facilities that is based upon the City's General Plan policy to attain 3.0 acres of park and recreation facilities per 1,000 residents. The Supplemental EIR evaluates the amount of recreational use areas that would be provided by the

proposed Project and the extent of increased usage of existing parks and recreational facilities that might result in the substantial physical deterioration of existing recreational facilities. In addition, the analysis of construction impacts associated with the development of proposed recreational facilities are considered as part of the overall Project.

#### 5.12.6 ENVIRONMENTAL IMPACTS

#### Summary of Impacts Identified in the GPU FEIR

The GPU FEIR determined that the City of Santa Ana has a ratio of 1.54 acres of recreation space per 1,000 residents based on 2019 population estimates, which does not meet the City's Municipal Code parkland standard of 2.0 acres per 1,000 residents. The GPU FEIR determined that buildout based on the GPU would result in a ratio of 1.20 acres of parkland per 1,000 residents based on a total of 515.11 acres of existing and proposed parks and recreational facilities. With the full buildout of the GPU, the population is expected generate a total citywide demand for 863.27 acres of parkland and recreational facilities, which would accelerate the use and cause potential physical deterioration of existing parks and facilities. Funding for additional parks would be provided in part from impact fees and grants. However, the GPU FEIR determined there is a lack of available land and Open Space-designated land to develop new parks or expand existing facilities. Therefore, the GPU FEIR determined that with regulatory requirements and mitigation measures, the GPU's impact would be significant and unavoidable.

The GPU FEIR concluded that the City is essentially built out and limited vacant land is available to be developed with new recreational facilities. However, the GPU FEIR discussed that future projects could result in the construction of new or improved recreational facilities, which could result in significant and unavoidable impacts.

#### **Proposed Specific Plan Project**

IMPACT PR-1: THE PROJECT WOULD RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS
ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED PARK
FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT
ENVIRONMENTAL IMPACTS.

**Significant and Unavoidable Impact.** The proposed Project would result in the development of up to 3,750 multi-family residential units, a 250-room hotel, a senior living/continuum of care use with up to 200 units, and approximately 350,000 SF of commercial uses. As described in Section 5.10, Population and Housing, the proposed Project is conservatively anticipated to result in 9,238 residents at full occupancy. This would increase demand for park and recreational facilities. Based on the GPU policy to attain 3 acres of parkland per every 1,000 residents, the proposed Project would result in a demand for approximately 27.7 acres of parkland, to support these additional populaces.

The proposed Project would meet a portion of this increased need through provision of approximately 13.1 acres of public open space, including a central park, two plaza spaces, a green link/paseo, and other open spaces such as landscaped parkways and programmable roads that could be used for public recreational areas. In addition, each of the buildings with residential units would include private recreation facilities for residents. Future developments pursuant to the Specific Plan would provide public and private open space

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<sup>&</sup>lt;sup>1</sup> While the Draft EIR's analysis relies on the person per household generation rate of 2.41 from the GPU FEIR, due to the potential unit type which would be developed within the Related Bristol Specific Plan, the applicant has commissioned a study that suggests buildout could result in a lower generation rate of 1.74 persons per household, which would result in fewer residents. Based on the 1.74 persons per household generation rate, buildout of the Project would result in 6,725 residents inclusive of senior units (Concord, 2023).

amenities at a ratio of 200 SF per unit, such as open space rooftop areas, tot lots, pools and spas, courtyards, fitness areas, dog runs, etc. Private open space areas, such as balconies and patios, would be provided at a ratio of 50 SF per unit, which is included in the 200 SF per unit requirement. Based on the ratio of 200 SF of open space per dwelling unit, buildout of the Specific Plan would include approximately 17.21 acres of public and private open space. Of that, approximately 187,500 SF (4.3 acres) of private open space would be provided based on the ratio of 50 SF per unit. Therefore, approximately 41.8 percent of the 41.13-acre Project site would be dedicated to public and private opens space amenities to meet the proposed Project's demands. Thus, onsite private and public amenities are anticipated to meet most of the park and recreation needs of Project residents.

However, based on the GPU policy of 3 acres of public park and/or recreational space per 1,000 residents set forth in the GPU, the proposed Project would require the provision of approximately 27.7 acres of parkland, or 67.3 percent of the Project site, to serve the new residents. Therefore, the proposed Project would require 14.6 acres of public parkland beyond the 13.1 acres currently proposed by the Project and 10.49 acres of combined public and private recreational amenities beyond that which is required by the Related Bristol Specific Plan development standards. As detailed previously, the City currently has approximately 1.2 acres of public park and/or recreational space per every 1,000 residents; and therefore, does not have existing sufficient land or Citywide parks and recreation facilities to support in meeting the City's standard GPU policy as set forth in the findings of the GPU FEIR.

Also, as listed in Table 5.12-1, there are currently 69.48 acres of Santa Ana parkland within two miles of the Project site, including the 10.4-acre Bomo Koral Park, which is less than 10-minutes walking distance from the Project site. These existing City of Santa Ana parks provide a variety of facilities that include sports fields, exercise equipment, picnic areas, and playgrounds.

Municipal Code Sections 35-108, 35-110, and 35-111 require that residential development fees be paid for the acquisition, construction, and renovation of park and recreation facilities prior to the issuance of a building permit for any construction which adds net residential units. Thus, the proposed Project would be required to comply with applicable Municipal Code requirements of 2 acres per 1,000 residents, which is less than the GPU policy of 3 acres per 1,000 residents, and/or pay development fees which would be used in part to acquire properties to build new park sites.

In order to comply with the GPU policy, the proposed Project would require 27.7 acres of parkland or the dedication of approximately 67.3 percent of the Project site. While the proposed Project would provide approximately 17.21 acres of public and private open space onsite, inclusive of 13.1 acres of publicly accessible open space and facilities, and would comply with applicable Municipal Code requirements, the proposed Project would not provide 27.7 acres of parkland and recreation facilities onsite and would not meet the City of Santa Ana's performance standard for parkland, either on the site or cumulatively through the availability of parks and recreation facilities citywide. As discussed in the GPU FEIR, the City of Santa Ana is essentially fully built out and there is a lack of available vacant land to develop substantial new parks or expand existing facilities. Therefore, there would be no feasible mitigation measures that would be able to reduce the proposed Project's contribution to significant impacts related to the City's unsatisfactory level of resident to parkland ratio. As such, impacts would be significant and unavoidable, which is consistent with the findings of the GPU FEIR.

IMPACT PR-2: THE PROJECT WOULD RESULT IN THE INCREASE OF 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.

**Significant and Unavoidable Impact.** As described previously in the discussion for Impact PR-1, the proposed Project would provide 13.1 acres of onsite public parks as a part of the 17.21 acres of open

space and recreation facilities, would provide private open space and recreation facilities with each building containing residential units; and would be required to pay applicable fees pursuant to Municipal Code requirements, which would be used to maintain and improve other City parks and recreation facilities. However, as discussed within the GPU FEIR, the City of Santa Ana is currently parkland deficient and is not meeting the GPU policy of 3 acres per 1,000 residents. In addition, with buildout of the GPU, the existing parkland deficiency is expected to increase as additional residential units are constructed with limited parkland increases.

It is anticipated that the proposed onsite open space and recreation facilities would meet many but not all of the needs of the new residential population, and that Project site residents would also utilize the existing 69.48 acres of parkland in the City of Santa Ana within two miles of the site. Anticipated visitation increases to these parks were estimated based on the California State Parks Survey on Public Opinions and Attitudes on Outdoor Recreation in California (2014) that established the average distance and travel time people in the Southern California region (which includes the Project site) take to reach the outdoor recreation they most often visit. The travel time is provided for both walking and driving in Table 5.12-2.

Table 5.12-2: Average Travel Time in Southern California to Outdoor Recreation Areas

Mode	<5 min	6-10 min	11-12 min	21-60 min	>60 min
Driving	20.1%	17.2%	20.8%	31.3%	10.6%
Walking	27.5%	20.3%	31.5%	18.9%	1.8%

Source: California State Parks, 2014.

As shown in Table 5.12-2, over 58 percent of people regularly drive up to 12 minutes to reach typical outdoor recreation uses. Another 31.3 percent drive between 20 and 60 minutes. Also, 47.8 percent of people that walk to outdoor recreation typically take less than 10 minutes; and 79.3 percent walk 12 minutes or less to outdoor recreation. All of the park and recreation facilities previously listed on Tables 5.12-1 are within the 12-minute driving distance; however, only Bomo Koral Park is within a 10-minute walking distance of the Project site. However, General Plan Open Space Element Policy OS-1.4 calls to ensure that all City residents have access to public parks, recreation facilities, or trails in the City of Santa Ana, within a 10-minute walking and biking distance of their home.

The California State Parks Survey on Public Opinions and Attitudes on Outdoor Recreation in California (2014) describes that 16.7 percent of residents visit parks two or more times per week, 13.8 percent visit parks about once a week, 20.6 percent visit once or twice per month, 24.4 percent visit several times a year, and 15.1 percent visit once or twice a year.

The facility users in Southern California went an average of 5.76 days per month and spent an average of approximately 30 minutes per visit. The adult park and recreation users generally engage in the following activities: walking on paved surfaces: 49.8 percent, playing: 27.9 percent, picnicking: 22.0 percent, sedentary activities: 17.6 percent, sports: 21.4 percent, running: 15.6 percent, and dog walking: 10.8 percent. The parks and recreation users under 18 years old generally engage in the following activities: playing: 57.8 percent, sports 33.1 percent, other 21.6 percent, walking on paved surfaces: 16.4 percent, picnicking: 14.3 percent, jogging: 14.5 percent.

Based on the California State Parks information for the Southern California region, the anticipated number of Project residents at full occupancy (9,238 residents), the distance and type of recreational facilities near the Project site, it is anticipated that the proposed Project would generate 1,543 additional park users two or more times per week, 1,275 additional park users about once per week, 1,903 additional park users once or twice per month, 2,254 additional park users several times a year, and 1,395 additional park users once or twice a year that would utilize the 69.8 acres of existing parks within 2 miles of the Project site and the 17.21 acres of parks and recreational facilities within the Project site.

In addition to the public open space that would be provided onsite by the proposed Project, Section 3.3 of the Related Bristol Specific Plan includes requirements for the provision of private recreational facilities for future development projects within the Specific Plan area. The Related Bristol Specific Plan would require the provision of a private recreation facility for Project residents within the Bristol Central Park, which would be provided in addition to the 2.5-acre publicly accessible park.

While the proposed Project would provide approximately 17.21 acres of public and private open space, inclusive of 13.1 acres of publicly accessible open space and recreational facilities onsite, per the requirements of the Related Bristol Specific Plan, the proposed Project's provision of parkland would not meet the City of Santa Ana's GPU performance standard of 3 acres of parkland for every 1,000 residents, either on the site or cumulatively. As the existing ratio of acreage of parks and recreational facilities to existing City population results in a parkland deficiency of approximately 154.44 acres, development of the proposed Project would continue to result in a deficiency in parkland throughout the City of Santa Ana. The Project proposes to provide approximately 1.4 acres of publicly accessible open space per 1,000 residents, which exceeds the approximately 1.2 acres per 1,000 residents currently existing within the City. Notwithstanding the Project's provision of public open space in proportion greater than existing currently in the City, it is reasonably foreseeable that the proposed Project would result in the increased use of existing parks and recreational facilities in a manner that results in accelerated substantial physical deterioration of the facility. As such, impacts would be significant and unavoidable, consistent with the findings of the GPU FEIR.

# IMPACT PR-3: THE PROJECT WOULD INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT.

**Significant and Unavoidable Impact.** As described above, the proposed Project proposes 17.21 acres of common and private open space and recreation facilities, including 13.1 acres of public open space. The project-level impacts of development of these recreational amenities are considered part of the impacts of the proposed Project as a whole and are analyzed throughout the various sections of this Supplemental EIR. For example, activities such as grading and construction, as required for the park and recreational components of this proposed Project, are analyzed in the Air Quality, Greenhouse Gas Emissions, Noise, and Transportation sections.

In addition to the 17.21 acres of common and private open space and recreation facilities, the proposed Project would contribute park development fees pursuant to Municipal Code Sections 35-108, 35-110, and 35-111 to be used towards the future expansion or maintenance parks and recreational facilities. However, the proposed Project's provision of parkland would not meet the 27.7 acres of parkland based on the GPU policy of 3 acres of parkland for every 1,000 residents, either on the site or cumulatively through the availability of parks and recreation facilities citywide. As discussed in the GPU FEIR, the City of Santa Ana is essentially fully built out and there is a lack of available land to develop new parks or expand existing facilities. Therefore, there would be no feasible mitigation measures that would reduce significant impacts related to the City's resident to parkland ratio as there is no land within the City to provide such additional parkland. As such, the proposed Project could require the construction or expansion of recreational facilities, the construction of which could result in significant impacts. As such, impacts would be significant and unavoidable, which is consistent with the findings of the GPU FEIR.

#### 5.12.7 CUMULATIVE IMPACTS

The cumulative area of recreation impacts for the proposed Project includes the City of Santa Ana. As detailed previously, the City currently has approximately 1.2 acres of public park and/or recreational space per every 1,000 residents which is below the City's GPU policy parkland standard of 3 acres of parkland

per 1,000 residents. Based on 3 acres of public park and/or recreational space per 1,000 residents, buildout of the proposed Project results in a need for approximately 27.7 acres of parkland to serve the 9,238 new residents of the Project site. The 13.1-acres of public parks provided onsite would be approximately 14.6 acres less than the 27.7 acres of public parkland required, and the overall provision of 17.21 acres of common or private open space would be 10.49 acres less than the City's parkland standard. Therefore, the proposed Project would exacerbate the existing citywide parkland deficiency. Although the proposed Project and cumulative projects would be required to provide park and recreational facilities and/or pay in-lieu fees as required by the municipal code, there is a lack of available land to develop new parks or expand existing facilities and the proposed Project's impacts related to the amount of parkland within the City would be cumulatively considerable and cumulative impacts related to parks and recreational facilities would be significant.

## 5.12.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

The following standard regulations would reduce potential impacts related to park and recreation services:

- California Code Sections 66000 (Mitigation Fee Act)
- Santa Ana Municipal Code Section 35-108
- Santa Ana Municipal Code Section 35-110
- Santa Ana Municipal Code Section 35-111

#### 5.12.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impacts PR-1 through PR-3 and cumulative impacts would be potentially significant.

#### 5.12.10 MITIGATION MEASURES

#### **GPU FEIR Mitigation Measures**

REC-1 The City shall monitor new residential development within the Dyer/55 Fwy focus area. Development proposals for projects including 100 or more residential units shall be required to prepare a public park utilization study to evaluate the project's potential impacts on existing public parks within a one half (1/2) mile radius to the focus area. The evaluation shall include the population increase due to the project and the potential for the new resident population to impact existing public parks within the radius. Each study shall also consider the cumulative development in the Dyer/55 Fwy and the potential for a cumulative impact on existing public parks within the radius. If the study determines that the project, or it's incremental cumulative impacts would result in a significant impact (substantial physical deterioration or substantial acceleration of deterioration) to existing public parks, the project shall be required to mitigate this impact. Measures to mitigate the significant impact may include but are not limited to land dedication and fair-share contribution to acquire new or to enhance existing public parks within the radius. Mitigation shall be completed prior to issuance of occupancy permits.

<u>Proposed Project Applicability: Mitigation Measure REC-1 is not applicable to the proposed Project because the Project is not located within the Dyer/55 Fwy Focus Area.</u>

#### **Proposed Specific Plan Project Mitigation Measures**

None.

#### 5.12.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts PR-1 through PR-3 and cumulative impacts would be significant and unavoidable. Although the proposed Project would provide public open space onsite and would be required to pay applicable park development fees pursuant to Municipal Code Sections 35-108, 35-110, and 35-111, the City of Santa Ana has a lack of available land to develop substantial new parks or expand existing facilities. As such, there is no feasible mitigation to reduce impacts related to the lack of parkland resulting from residential development within the City.

#### **REFERENCES**

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- City of Santa Ana General Plan Update Final Recirculated Program Environmental Impact Report. October 2021. Accessed: <a href="https://www.santa-ana.org/general-plan-environmental-documents/">https://www.santa-ana.org/general-plan-environmental-documents/</a>

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