



September 2, 2021

Sent via USPS and
email: newgeneralplan@santa-ana.org
and MMcCann@santa-ana.org

Melanie McCann, Principal Planner
City of Santa Ana Planning and Building Agency
P.O. BOX 1988 (M-20)
Santa Ana, CA 92702

Subject: Comment Letter for NOA for Recirculated Draft Program EIR for the Santa Ana General Plan Update (SCH No. 2020029087)

Dear Ms. McCann:

City of Irvine staff reviewed the Recirculated Draft Program EIR (PEIR) as a supplemental analysis to the original Draft PEIR for the proposed comprehensive General Plan Update 2045 (excludes the 6th Cycle Housing Element update) also known as Santa Ana's "Golden City Beyond: A Shared Vision" General Plan.

The Recirculated Draft PEIR addresses the following changes:

- Reflect changes in the environmental setting;
- Reflect updates made to the GPU policies and implementation actions;
- Concludes that the recreation-related impacts of the proposed GPU would result in a significant impact and to define a new project alternative to reduce these impacts (i.e., reduced park demand); and
- More thoroughly discusses and evaluates impacts related to environmental justice, including air quality/health risk, hazards, and recreation/open space.

Based on the review of the Recirculated Draft PEIR, staff would like to provide the following comments:

1. Table 5.2-11 on Page 5.2-70: Revise last line item description from "Existing Land Uses Total" to "Proposed Land Uses Total."

Appendix K - Traffic Impact Study Comments:

2. Page K-98, Segment #84 Dyer Road from Pullman to Street to Red Hill: The traffic study identified City of Santa Ana 23% fair share contribution towards Dyer Widening. The widening segment should extend to the SR-55 NB Ramps. A fair share cost towards the future widening of Dyer (Red Hill to the SR-55 NB Ramps)

to the ultimate geometry should be provided and coordinated with the City of Irvine. The last sentence under this bullet item should be revised to "...the City of Santa Ana will provide a fair-share contribution of 23% for the future widening of Dyer (Red Hill to the SR-55 NB Ramps).

3. Page K-99 INT 100- Red Hill Avenue and Alton Parkway: Table 8-4 shows two different percentages, 21% for AM and 34.7% PM. The fair share contribution should be based on the higher percentage. Therefore, this bullet item should identify City of Santa Ana's 34.7% fair share contribution towards Red Hill/Alton intersection improvements.
4. Page K-98 INT 105-Von Karman and Barranca: Table 8-4 shows 14.1% (PM) fair share contribution. Update this bullet item to identify City of Santa Ana's 14.1% fair share contribution towards Von Karman/Barranca intersection improvements.
5. Table 8-5: The proposed mitigations did not bring the intersections to No Project Conditions. Per City of Irvine adopted Traffic Study Guidelines, a project that causes an impact will be required to mitigate the intersection, at a minimum, back to the baseline (i.e., No Project) condition. The proposed mitigations for Intersection #100 at Red Hill/Alton (PM) and Intersection #105 at Von Karman/Barranca (PM) do not mitigate the intersections back to No Project Condition. Additional improvements must be identified to address the LOS impact.
6. The City of Santa Ana has a number of fair share contributions to address level of service impacts in the City of Irvine. Please contact Lisa Thai, Supervising Transportation Analyst, at lthai@cityofirvine.org to initiate discussion regarding fair share funding agreement.

Thank you for the opportunity to review and comment on the proposed project. Please add us to the project notification distribution lists (email and USPS) especially public meetings/adoption hearings and approval notifications. Staff appreciates the opportunity to review any further information regarding this project as the planning process proceeds.

If you have any questions, please contact Senior Planner Melissa Chao at 949-724-6395 or at mchao@cityofirvine.org.

Sincerely,



Marika Poynter
Principal Planner

Ms. Melanie McCann
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ec: Kerwin Lau, Manager of Planning Services
Sun-Sun Murillo, Project Development Administrator
Lisa Thai, Supervising Transportation Analyst
Steve Sherwood, Assistant City Engineer
Stan Ng, Associate Engineer
Melissa Chao, Senior Planner