

From: [Rica Garcia](#)
To: [PBAeComments](#)
Subject: Public Comments Submission - Santa Ana General Plan Update
Date: Monday, November 8, 2021 3:23:15 PM

To whom it may concern:

Our Office understands that disadvantaged communities in Santa Ana are significantly impacted by lead contamination. As outlined in our October 16, 2020 letter to the City of Santa Ana regarding the General Plan Update, we recommended the City consider adding additional measures to address lead contamination.

(<https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/sb1000-letter-santa-ana.pdf>). We also recommended that the City consult with disadvantaged communities in its jurisdiction to solicit ideas on how to address the pollution burdens related to lead contamination.

According to the California Office of Environmental Health Hazard Assessment, lead concentrations of at least 80 parts per million (ppm) are considered hazardous to human health and safety. A recent research study from the University of California has revealed that 56 different census tracts in the City of Santa Ana have maximum lead concentrations that exceed 80ppm.

(<https://www.sciencedirect.com/science/article/abs/pii/S0048969720342881>). The majority of these census tracts are in disadvantaged communities.

Given the magnitude of the soil lead contamination issue in Santa Ana, has the City considered adopting policies that would (1) require property owners to test for soil lead toxicity prior to approving new land uses or granting development approvals; (2) require adequate remediation before new development; (3) adopt standards to require soil testing at development sites where contamination is suspected; and/or (4) require soil testing of property adjacent to property with hazardous soil lead levels.

Thank you,
Rica

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