

December 7, 2021

Re: Environmental Justice in Santa Ana's General Plan Update

Dear Mayor Sarmiento and Santa Ana City Council,

Thank you for the opportunity to comment on the City of Santa Ana's Draft General Plan Update. I am a PhD Candidate at the University of California Irvine specializing in environmental justice policy issues in Southern California, and my dissertation research focuses on SB 1000 implementation in Santa Ana. I have had the pleasure of working closely as a research collaborator with community organizations in Santa Ana since 2014, most recently with MPNA-GREEN's community air monitoring initiative.

I am writing to express my serious concerns with the Draft General Plan Update and to urge the City Council not to adopt the GPU at today's City Council meeting. As a blueprint for the next several years of the City's development, this document should ensure inclusiveness, transparency, and accountability.

- 1. It is antithetical to the environmental justice principles to approve the General Plan Update in a meeting that is not accessible to all Santa Ana residents.** Robust, inclusive, and equitable community engagement is the cornerstone of environmental justice. While the City has made important strides in improving community outreach about EJ in the General Plan since last fall, when the state Department of Justice endorsed a delay in the planning process, the current General Plan falls short of reflecting the voices and interests of the city's 17 disadvantaged communities. For one immediate and crucial example, remote participation in city meetings by Zoom and phone is no longer available to residents, despite ample evidence throughout the pandemic that these options are both feasible and essential for community engagement.
- 2. The General Plan Update should establish procedures and expectations for transparency and accountability regarding historical, ongoing, and future environmental hazards impacting Santa Ana's disadvantaged communities.** In the course of my work with MPNA-GREEN and UCI researchers, we have encountered a serious lack of transparency about industrial permits and permit violations. MPNA-GREEN and numerous community leaders have recommended several measures to ensure transparency and accountability, including:
 - a. Collection and publication of baseline data on emitters, emissions, and concentrations for each disadvantaged community,
 - b. Specific, goal-oriented remediation plans for each disadvantaged community

- c. Public access to comprehensive and up-to-date emissions reports from all facilities requiring permits from air quality, water quality, and toxic substances control boards,
- d. Establishing a city Office of Environmental Justice to oversee emitters' compliance with existing environmental regulations, coordinate among environmental agencies and other stakeholders, and track and respond to community input, and
- e. Publishing monthly reports on permit violations, permit requests, pending cleanups, code violation enforcement, and city compliance with environmental standards in each of the city's disadvantaged communities.

In asking you to delay the approval of the current General Plan Update, I would be remiss if I did not thank each of you for your commitment to supporting environmental equity and community engagement in the planning process thus far. As one of the first municipalities in California to implement SB 1000 in its General Plan Update, Santa Ana is at the vanguard of developing, community-led solutions to environmental justice issues across the state. The City has the opportunity to set a new standard for local, participatory environmental justice policy. Please heed the voices of the community leaders and residents most impacted by toxic pollution, social vulnerability, and political marginalization: do not pass this General Plan Update without incorporating their concerns.

Sincerely,



Kathryn Cox, MA
 PhD Candidate in Anthropology, University of California Irvine
 National Science Foundation Graduate Fellow
 Haynes Foundation Graduate Fellow
 UCI Newkirk Center Environmental Justice Fellow

cc: Adolfo Sierra, President, Madison Park Neighborhood Association
 José Rea, Treasurer, Madison Park Neighborhood Association
 Leonel Flores, GREEN Community Organizer, Madison Park Neighborhood Association
 Jabari Brown, Myson Foundation Clinical Fellow, UCI Environmental Law Clinic
 Vicente Sarmiento, Mayor, City of Santa Ana
 Thai Viet Phan, Ward 1 Councilmember, City of Santa Ana
 David Penalozza, Ward 2 Councilmember, City of Santa Ana
 Jesse Lopez, Ward 3 Councilmember, City of Santa Ana
 Phil Bacerra, Ward 4 Councilmember, City of Santa Ana
 Johnathan Ryan Hernandez, Ward 5 Councilmember, City of Santa Ana
 Nelida Mendoza, Ward 6 Councilmember, City of Santa Ana
 Kristine Ridge, City Manager, City of Santa Ana
 Sonia Carvalho, City Attorney, City of Santa Ana