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Via Email and U.S. Mail

September 11, 2018

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City of Santa Ana
City Manager's Office
20 Civic Center Plaza, 8th Floor
P.O. Box 1988, M31
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**Re: Comment on Draft Environmental Impact Report, 2525 N. Main Street
Multi-Family Residential Project (aka Magnolia at the Park) SCH
2018021031, DP No. 2017-34**

Dear Ms. Thai, Mr. Godinez and Ms. Kelaher:

I am writing on behalf of the Laborers International Union of North America, Local Union No. 652 and its members living in the City of Santa Ana ("LIUNA"), regarding the Draft Environmental Impact Report; ("DEIR") prepared for the Project known as 2525 N. Main Street Multi-Family Residential Project (aka Magnolia at the Park) SCH 2018021031, DP No. 2017-34, including all actions related or referring to the proposed project that would demolish the existing 81,172 square foot vacant two-story office building and 442 space surface parking lot to redevelop the 5.93-acre site with 405,290 square feet of residential

buildings that would provide 496 for-rent multi-family residential units located at 2525 North (N.) Main Street, in the northern portion of the City of Santa Ana approximately 500 feet east of Interstate 5 (I-5) (“Project”).

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After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. Commenters request that the Planning and Building Agency address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

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We hereby request that City of Santa Ana (“City”) send by electronic mail, if possible or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”), including, but not limited to:

- Notices of any public hearing held pursuant to CEQA.
- Notices of determination that an Environmental Impact Report (“EIR”) is required for a project, prepared pursuant to Public Resources Code Section 21080.4.
- Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
- Notices of preparation of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21092.
- Notices of availability of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.

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- Notices of determination that a project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

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Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092,** which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send notice by electronic mail, if possible or U.S. Mail to:

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Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Richard Drury
Lozeau Drury LLP