Correspondence
Item No. 0a
Public Comments
04/04/12

Brenda Wisneski, Zoning Administrator
City of Newport Beach
3300 Newport Blvd
Newport Beach CA 92663

RE: Coast Business Center Sign Program 2121 E Coast Hwy (PA2012-010)

Dear Ms. Wisneski,

Thank you for the opportunity to comment on the application for Modification Permit No. MD2012-004 and Comprehensive Sign Program No. CS2007-002 (PA2012-010). I am opposed to approval for the following reasons:

1. According to code, the applicant is allowed one sign on E Coast Hwy and one sign on Avocado Ave. The applicant has **substantially exceeded limits** already.
2. According to code, the applicant is allowed a 75 sq ft sign on the primary frontage and a 37.5 sq ft sign on the secondary frontage. I have been told the applicant has, or will have, 320 sq ft of signage on E Coast Hwy and 120 sq ft of signage on Avocado Ave. This is **four times the allowable signage** specified by code.
3. Additional approvals would amount to an **excessive proliferation of signage** and would devalue the current tenant signs by adding clutter. Additional signs would devalue neighboring commercial property owner signs by adding clutter.
4. Adding signs **does not assist in way finding**. There is only one large white office building at the corner of E Coast Hwy and Avocado Ave. Visitors do not enter suites at the sign locations. Visitors enter through common lobbies.
5. Adding signs **does not preserve community appearance**. The property is adjacent to residential properties and any increase in intensity of advertising, especially lighted signs, may negatively affect the wellbeing of residential neighbors and decrease their property values. The same is true for nearby commercial properties where signage is kept under control, such as Corona del Mar Plaza and Newport Center.
6. The property is located across the highway from some of the premier commercial properties in Newport Beach, Orange County and the nation. There is **no need to revitalize** the area with signage.

These are some of my initial concerns. I am looking forward to providing you with additional and more specific comments at the hearing on Wednesday.

Sincerely,

Dan Purcell
Ocean Blvd
Corona del Mar

Monica Bonakdar, M.D.
BEAUTY, LASER & WELLNESS CENTER
BUILDING SIGNAGE AVAILABLE
FOR LEASE
DAVE BUECHE
949.705.5003
Sperry Van Ness
Commercial Real Estate Advisors

HAUCK
CapitalSource Bank
2012/04/03 13 : 03

HAUCK
CapitalSource Bank
McCLONEY
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2121 E. PACIFIC COAST HWY

COAST BUSINESS CENTER
DOUGLAS HAUCK D.D.S., INC.
ROBERT W. KESSLER M.D., FACS
REMER, DIVINCENZO & GRIFFITH
BARBARA MALLONEE D.D.S.
MONICA BONAKDAR, M.D.

CapitalSource Bank

MALLONEE
DENTISTRY

HAUCK
COSMETIC DENTISTRY

KESSLER
PLASTIC SURGERY

Monica Bonakdar, M.D.
BEAUTY, LASER & WELLNESS CENTER

PLASTIC SURGERY BODY CONTOURING
MEDICAL SPA DR. SIAMAK AGHA
CapitalSource Bank

DREAMWORKS DENTAL
CENTER

Coast Hwy
CORONA DEL MAR PLAZA
BRISTOL FARMS
PEET'S COFFEE
SUR LA TABLE
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Coast Hwy
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REAL OFFICE CENTERS
For Lease
Executive Suites
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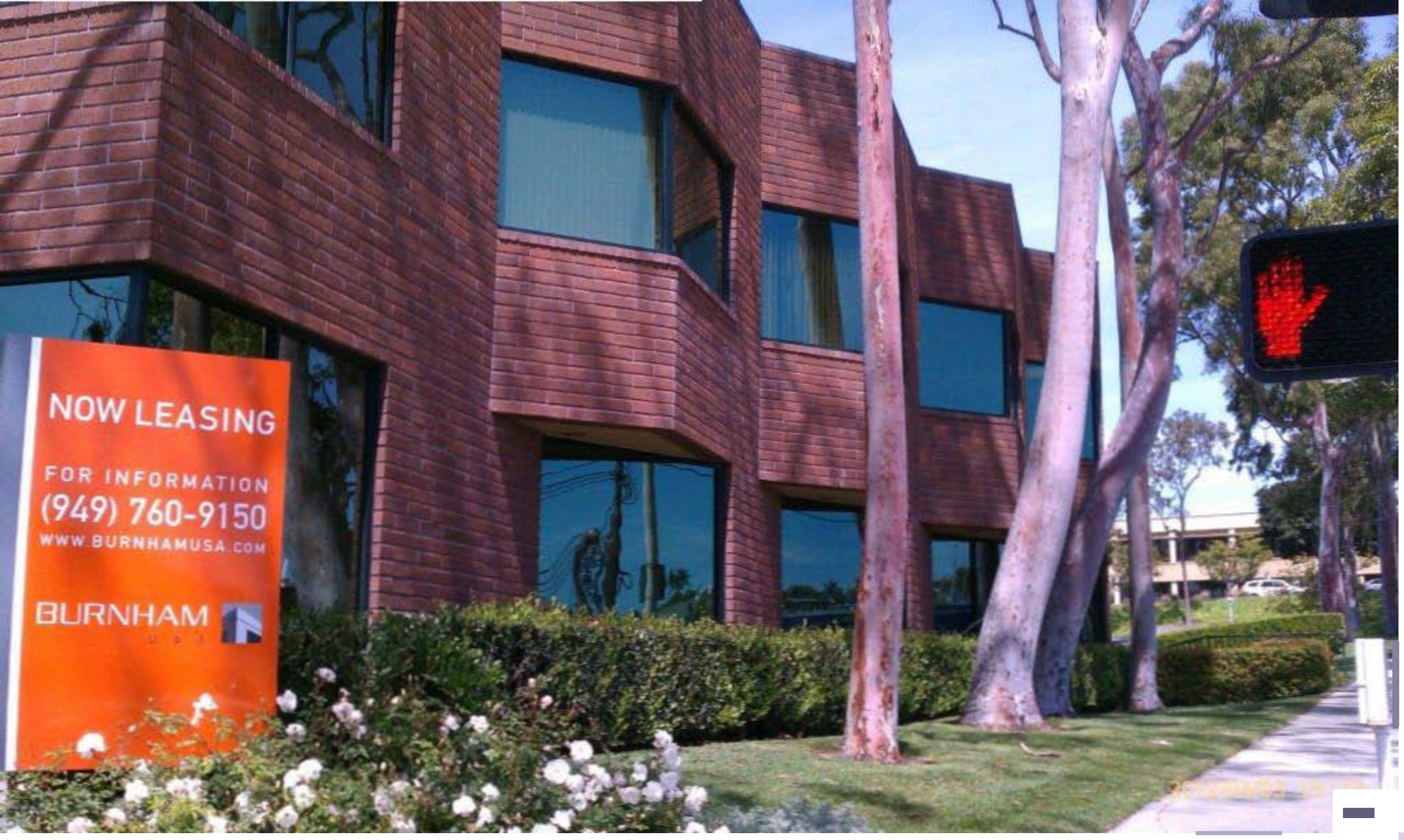
NOW LEASING
FOR INFORMATION
(949) 760-9150
WWW.BURNHAMUSA.COM
BURNHAM

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CORPORATE PLAZA
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FIRSTTEAM ESTATES
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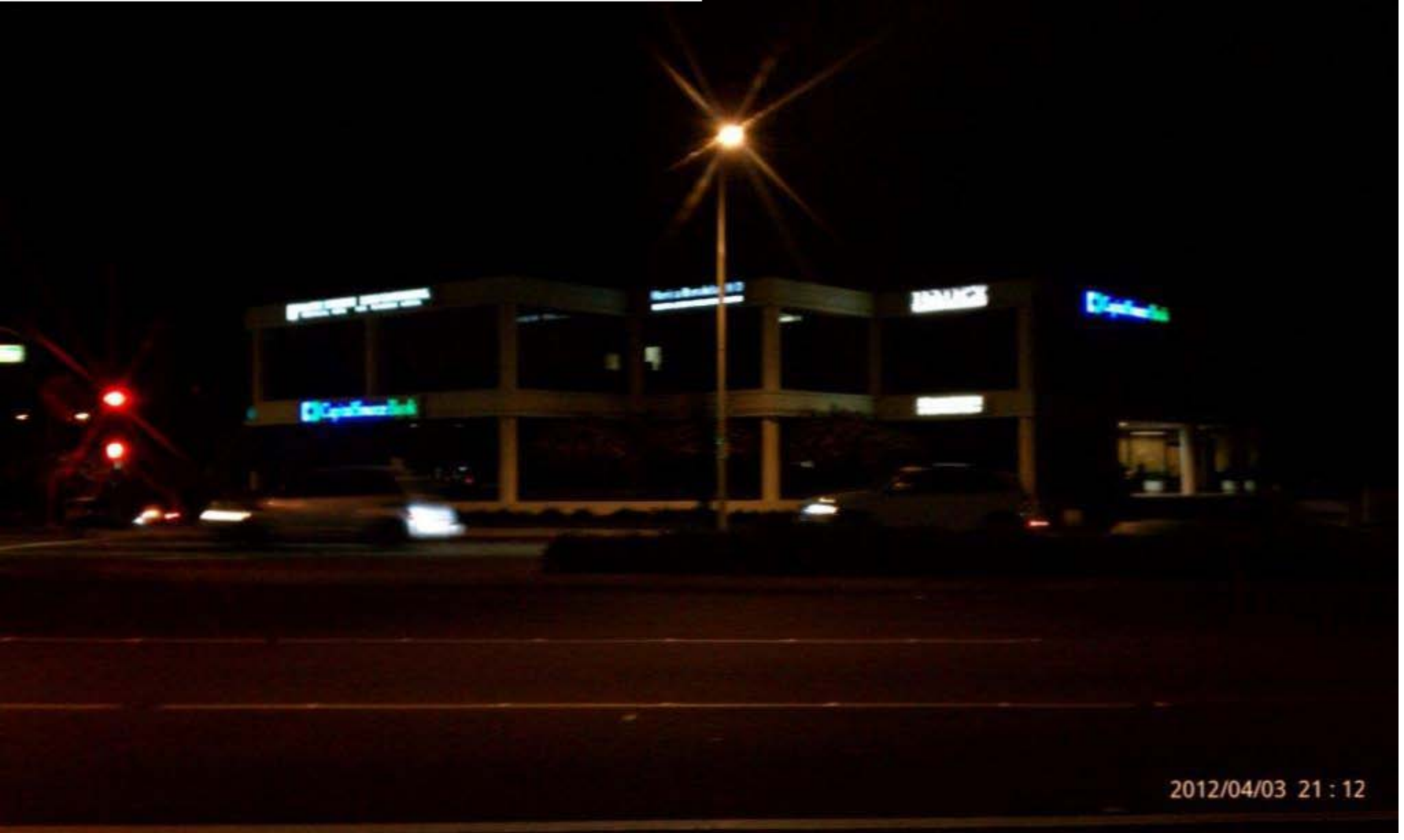
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PLASTIC SURGERY
MEDICAL SPA
BODY CONTOURING
DR. SIAMAK AGHA
DREAMWORKS DENTAL
CapitalSource Bank
2012/04/03 21 : 14

DREAMWORKS DENTAL
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RECEIVED BY
COMMUNITY
APR 05 2012
DEVELOPMENT
CITY OF NEWPORT BEACH

AprilS, 2012

Newport Beach Planning Commission
3300 Newport Boulevard
Newport Beach, CA 92663
(via e-mail)

Re: March 22, 2012 Hearing Item 4 - Newport Banning Ranch - (PA2006-114)

Honorable Commissioners,

I would like to add my voice to that of Suzanne Forster in her April 4, 2012 letter to the editor of the *Daily Pilot* requesting the Planning Commission rescind its two late night decisions of March 22,2012 regarding the Newport Banning Ranch (NBR) application (recommendations to Council regarding re-circulation and certification of the Environmental Impact Report (EIR)) and reschedule a properly noticed and conducted hearing on the NBR EIR. This seems particularly important to me for a project of wide public interest in mUltiple communities and I request that this letter be made part of the administrative record for EIR SCH No. 2009031061.

I agree with Ms. Forster that the Chair's instructions to the public, however well intentioned, were extremely intimidating, both in substance and tone, and at least in my view improperly discouraged from speaking those members of the public who did not feel they were qualified environmental experts with significant new factual information to add to the record. I also agree with Ms. Forster that the traffic section of the EIR most likely requires significant revision in view of the Orange County Transit Authority (OCTA)'s recent decision to permanently remove the 19th Street bridge from the County's Master Plan of Arterial Highways without providing any agreed to mitigation measures - a fact which staff declined to acknowledge even though the City of Newport Beach (CNB) is either initiating or in the process of considering litigation to modify the aCTA action.

In addition I feel compelled to raise the following procedural and substantive issues which in my view improperly limited public participation and which I feel will permanently cloud the Commission's recommendations:

1. Inadequate hearing notice
2. Inadequate time to evaluate Response to Comments
3. Inadequate/misleading agenda listing
4. Improper handling of overflow crowd
5. Misleading and incomplete staff report
6. Failure to provide context for hearing
7. Lack of credible basis for actions
8. Adoption of defective resolution

1, Inadequate hearing notice

Please see Attachments 1 and 2 to this letter for a transcription of the notice of the March 22, 2012 CNS Planning Commission hearing published in the *Daily Pilot* on March 10, 2012. The NBR portion of the notice (Attachment 1) describes the project, identifies the components of the project application and informs the public than environmental concerns have been dealt with by means of an EIR prepared in compliance with California Environmental Quality Act (CEQA)

guidelines. The notice gives no hint regarding the purpose of the March 22 hearing, and could be read to imply the EIR has been completed and certified.

Compare this to the notice of the subsequent item (Attachment 2) which clearly notifies the public of the purpose of the hearing and the contemplated actions.

The similar but somewhat more extensive notice mailed to neighboring property owners (not attached) *does* include a line before the CEQA notice saying "*The Planning Commission will provide recommendations to the City Council for final decisions on these applications. Additional public notice will be provided as to the date, time, and place of City Council hearings*."

But again, no hint is given that the NBR DEIR will be the subject of the March 22 hearing, or that recommendations regarding it would be made at that time.

2. Inadequate time to evaluate Response to Comments

On March 16, 2012 just six days before the hearing scheduled for an unstated purpose, CNB released 1030 pages of *Responses to Comments*, 1200 pages of appendices related to those comments, and a 96 page *Mitigation, Monitoring and Reporting Program* related to the NBR DEIR. Even for those who knew the March 22 meeting would focus on the DEIR this was a very large volume of closely worded material to digest in a very short time, especially for those, including the Commission, who are not environmental professionals with 40 hours a week (or more) to devote to the matter.

Several members of the public testifying on March 22 said they found the responses to their own comments non-responsive. Aside from a few perfunctory questions from Commission to staff at the March 22 hearing it is unclear if anyone, including staff or consultants, made any effort to determine if the public agencies submitting comments found the responses adequate or if they continued to have reservations about the NBR DEIR.

3. Inadequate/misleading agenda listing

The agenda listing for the NBR portion of the Planning Commission's March 22, 2012, on the basis of which the public is supposed to be able to determine if they want or need to attend, is transcribed in Attachment 3 to this letter.

The agenda listing for the previous item (the Ocean Boulevard lot merger) clearly states in the *Summary* the purpose of the hearing and under *Action* mentions not only that the Commission will be conducting a hearing, but that it will be recommending approval or denial by means of adopting one of two alternative resolutions referenced in the associated staff report.

By contrast, the NBR agenda listing gives no hint under *Summary* of what the purpose of the hearing, and there is nothing under *CEQA Compliance* suggesting the EIR is tentative or has not already been approved. Under *Action* the public is told the Commission will "*Receive staff report focused in Environmental Impact Report*," conduct a hearing and continue the hearing to April 5, 2012.

This is defective in two ways. First, based only on this agenda the public might reasonably assume the EIR had already been certified and a staff report on the EIR was to be presented simply as a way to set the context for opening a hearing on the development application, which was be continued to a future date. Second, for those more familiar with the culture of CNB Planning Commission agendas, the absence of any mention that a resolution was going to be considered for adoption definitely means that no action would be taken until a subsequent meeting.

I have personally examined all the Planning Commission agendas back through 2009, and a number from prior years, and although the Commission may suggested modifications to the actions recommended by staff, prior to the March 22 NBR matter I have been unable to find any prior instance in which the Commission took an action when no action was noticed in the agenda. In a number of instances the agenda announced under *Action*, as for the NBR listing, that the Commission would "(1) Conduct public hearing; (2) Continue public hearing to …" On rare occasions the Commission modified the recommended date for the continuation of the hearing, but in every case the Commission continued the hearing as promised without taking any action beyond ones clearly noticed in the agenda.

Although the Assistant City Attorney assured the Commission that the March 22 votes were properly agendized in compliance with the Brown Act, the California Attorney General in their handbook on the very similarly worded Bagley-Keene Act (governing state, as opposed to county and local, agencies) notes that if a body voluntarily chooses to distinguish action from discussion items in their agendas, they should feel compelled to fit their actions to their notices.

In summary, no one seeing the March 22, 2012 agenda would have expected the Planning Commission to do anything other than open a hearing on the NBR and continue it to April 5th. While the Chair, in his opening remarks to the NBR matter, may have implied actions on the EIR might be taken that night, that is insufficient. A reasonable person relying on the agenda would have assumed that before any such actions were taken they would have an additional opportunity to provide input on April 5, and perhaps beyond.

4. Improper handling of overflow crowd

As the Commission may be only dimly aware, a very large crowd assembled at the CNB Council Chambers at 6:30 pm on March 22, the noticed time of the hearing. The crowd filled the lobby and overflowed into the courtyard, a problem compounded by staff having scheduled the contentious Ocean Boulevard item (which itself may have filled the Chamber) on the same night. Staff did not have an adequate supply of agendas or staff reports, nor did they provide any means for the overflow crowd to hear or participate in the proceedings. For example, at the beginning of the meeting the Chair offered to allow some of the overflow public to sit at the staff conference table at the front of the hall, but even inadequate as that was, those being invited could not hear the invitation.

Since no indication was given as to when the NBR matter would be heard, or if the entire overflow audience would have a chance to be seated for it, many left in frustration, and assuming they had seen a copy of the agenda would have done so assuming they would have an opportunity to speak and participate on April 5, before any action was taken. No announcement, audible or otherwise, was made to the contrary prior to the commencement of the NBR hearing at 9:00 pm. At a minimum, it would seem to me the overflow crowd should have been given a reasonable time to express their views through written comments before the

Commission considered any action, or have been clearly notified as to whether the hearing was going to be continued (as promised) or not.

5. Misleading and incomplete staff report

The staff report compounds the confusion regarding whether any action was contemplated on Agenda Item 4 (the NBR application) at the March 22, 2012 meeting by copying on handwritten page 1 the inadequate language from the agenda as "Project Summary" and "Recommendation." Again there is no hint the EIR has not been already approved and that a vote or votes or a resolution or resolutions is contemplated at the March 22 meeting.

On the contrary, those who leaf through to handwritten page 7 will see that the timeline for the "EIR Review Process" includes not only the March 22 hearing before the Planning Commission, but also a second one on April 5, and possibly more.

Those who notice a draft resolution recommending certification is included in the staff report as *Attachment No. PC 1* will have had this impression reinforced by the "Whereas" on handwritten page 20 which says that "public hearings were held on March 22 and _____, 2012," where it can only be assumed the dates of subsequent hearings on the EIR were intended to be added to the blank space.

The only thing contradicting this interpretation is the statements made under "*Discussion*" on handwritten page 8, suggesting the March 22 meeting will be devoted to the EIR and the April 5 meeting to the development application – but we now know the staff was not in fact prepared to conduct a hearing on the application on April 5 and asked for the NBR matter to be continued to April 19.

The staff report is also inadequate in providing no clear menu of actions required to complete consideration of the EIR by the Planning Commission.

6. Failure to provide context for hearing

As indicated in the draft minutes of the March 22 meeting, Agenda Item 4 began with an explanation by the Chair of the EIR process. For those who had not previously attended a meeting regarding the NBR application, this was woefully inadequate, especially since, as noted above, the vast bulk of the audience were provided with neither agendas or staff reports. To the best of my recollection neither the project nor the contents of the EIR were described, and the Commission launched into a short laundry list of questions, apparently assuming everyone in the audience had attended all the Study Sessions and had time to understand the structure and content of the EIR (described only as "oh the documentation is exhaustive – I think it's three feet tall) on their own.

Considering this was the first public hearing, and especially in view of the absence of agendas and staff reports, I feel the public deserved having the context laid a bit better before being asked to comment on something they may or may not have seen.

7. Lack of credible basis for actions

In moving to reject re-circulation of the NBR DEIR and in adopting the resolution recommending its certification, the Planning Commission is presumably telling the CNB Council that it has thoroughly reviewed the EIR and, in its independent judgment, agrees with all its conclusions.

To put this in context, Attachment No. PC 3 to the March 22, 2012 Staff Report is a table giving a "Summary of Significant Impacts and Mitigation Program." Although it seems to list "insignificant" and "less than significant" impacts as well, the table includes something like 90 numbered questions (an exact total is difficult because, for example, question Threshold 4.6-5 contains three separate questions that are not separately numbered) that have to be answered as to whether they have an environmental impact or not. The consultant appears to have concluded that something like 23 of these will have "no impact," 47 will have (after mitigation) "less than significant impact" and 8 will have a "significant unavoidable impact."

It is absolutely incredible to me that after diligently reviewing the project application, 1432 pages of the DEIR (plus another 5817 pages of appendices), the 1030 pages of comments (plus another 1200 pages of appendices), and the 96 page *Mitigation, Monitoring and Reporting Program*, and listening to the public testimony at its study sessions and public hearing, that the Planning Commission failed, in its independent judgment, to find a single instance in which they might reach a different conclusion from the applicant and consultant as to the significance of a particular impact, or think a different mitigation measure might be more effective.

I am particularly curious if the Planning Commissioners agree with the applicant and consultant that a massive pedestrian bridge over West Pacific Coast Highway has no visual impact, or that an alternative of annexation without development (that is continuing under the current ownership, but with the City Charter forcing consolidation of oil operations) should not have been considered (Alternative A, as I understand it, assumes no annexation, and therefore a continuation of oil operations as they now exist).

8. Adoption of defective resolution

In addition to thinking the NBR DEIR should be re-circulated (due primarily to defective noticing for which the consultant could offer no adequate response), had I known the draft resolution in the March 22, 2012 staff report was going to be considered at that meeting (and not on April 5 or at some subsequent meeting, as the agenda and staff report implied) I would have spoken against it, for it is highly defective, both on its own merits and in comparison to other resolutions adopted by the Planning Commission recommending certification of EIR for other projects.

As a Newport Beach taxpayer I think I am most concerned about the final boilerplate "Whereas" on handwritten page 20 of the staff report (page 2 of 23 of the draft resolution), which seems to state the Planning Commission is recommending certification on the assumption that the costs of any legal challenges will be borne by the project applicant – but offers no suggestion as to how that assumption will be implemented or could be enforced by the City Council. For an EIR that is almost certain to provoke a legal challenge this seems to me to be an extremely serious shortcoming. At the same time, I am also concerned that such a guarantee, if feasible, could lead to a "we can approve anything because we won't have to pay to defend it" attitude, which, at least to me, serves neither the public nor the applicant well.

Beyond that, the 19 page "Exhibit B – Findings of Fact" is, in my opinion, highly defective both in substance and in comparison to the attachments to other resolutions recommending certification of EIRs approved by the Planning Commission in the past, and I am again startled that the Commission voted to adopt this without recommending a single change.

First, I am unable to find any guidance given as to the Council as to the CEQA required definition of what constitutes the Final EIR and the administrative record related to it.

Second, I am able to detect relatively clear findings supporting the conclusions of the EIR only with regard to the 5 to 7 "Effects with No Impact" listed on handwritten page 39 of the staff report (page 21 of the 23 page draft resolution). With respect to the list of the 8 to 13 (it's hard to count precisely) "Significant Unavoidable Impacts" listed on pages 22 and 23 of the draft resolution, the findings supporting the conclusion that these are significant frequently lack clarity and the findings supporting the notion these effects cannot be mitigated are generally non-existent. Moreover, the list of "no impact" effects appears to be an arbitrary subset of the effects concluded to have "no impact" as listed in the following Attachment No. PC 3 to the Staff Report. I am unable to understand why one particular subset of "no impact" effects deserves support by "Findings of Fact" and the others do not.

Third, the Commission appears to be offering the Council no guidance at all as to proposed findings regarding the 47 or so other effects the EIR concludes will have a "less than significant impact" after mitigation – either as to why they are significant to start with or as to why the proposed mitigation measures would be effective.

On that final note, it is unclear if the Commission, after reviewing it, is making a recommendation with regard to the *Mitigation, Monitoring and Reporting Program* since it is unclear from the resolution what the Commission is recommending be regarded as the Final EIR for the NBR project.

Again, attention to proper process, a thorough independent analysis of impacts and mitigation measures and a sincere effort to engage public involvement seem particularly important for a high profile project involving communities outside Newport Beach. For the above reasons and others stated in public comment, I feel the City's handling to date of the NBR environmental review has been inadequate and urge the Commission to reconsider its March 22nd decisions regarding re-circulation and certification of the EIR.

Thank you in advance for your consideration of my comments

Yours sincerely,

James M. Mosher, Ph.D.
2210 Private Road
Newport Beach, CA. 92660
jimmosher@yahoo.com
(949) 548-6229

Attachment 1 : Content of Notice Published in Daily Pilot - March 10, 2012

3300 Newport Boulevard,
Newport Beach
PLANNING COMMISSION AGENDA
Regular Meeting March 22, 2012 at 6:30 p.m.

1. SUBJECT: **Newport Banning Ranch** - PA2008-114

North of West Coast Highway, south of 19th Street, and east of the Santa Ana River. The Project Site is adjacent to the City of Costa Mesa on the east, unincorporated County on the north and west, and the existing developed areas of the City of Newport Beach on the south and southeast. The Santa Ana River and the City of Huntington Beach are located west of the Project Site.

SUMMARY: A proposed planned community on a 401.1 acre project site for development of 1,375 residential dwelling units, a 75 room resort inn and ancillary resort uses, 75,000 square feet of commercial uses, and approximately 51.4 acres of parklands. The application consists of the following components: a Pre-annexation and Development Agreement between the applicant and the City of Newport Beach describing development rights and public benefits; General Plan Amendment to the Circulation Element of the General Plan to delete the planned segment of 15th Street west of Bluff Road; Code Amendment to rezone the project site from. Planned Community (PC-25) to Planned .Community (PC-57) and a pre-annexation zone change is proposed for those portions of the project site located within the City's Sphere of Influence from County zoning to PC-57; Planned Community Development Plan would establish the allowable land uses, general development regulations and implementation and administrative procedures; Master Development Plan to establish detailed design criteria for each .land use component to guide the review of subsequent development approvals; Tentative Tract Map to establish lots for public dedication or conveyance, lots for residential development and conveyance to homebuyers, and lots for financing and conveyance; Affordable Housing Implementation Plan specifying how the project would meet the City's affordable housing requirements; and Traffic Study Approval pursuant to Chapter 15.40 (Traffic Phasing Ordinance).

APPLICATION:ER2009-002, DA2008-003, NT2008-003, GP2008-008, PC2008-002, and CA2008-004

CEQA COMPLIANCE: **NOTICE IS HEREBY FURTHER GIVEN** that pursuant to the California Environmental Quality Act (CEQA) the City of Newport Beach has prepared Environmental Impact Report (EIR) -SCH No. 2009031061 to evaluate the environmental impacts resulting from the proposed project. The DEIR has been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended (Public Resources Code Section 21000 et seq.), and the State CEQA Guidelines for Implementation" of CEQA, (California Code of Regulations, Title 14, Section 15000 et seq.).

Attachment 2: Remainder of Notice Published in Daily Pilot - March 10, 2012

2. **SUBJECT**: **2808 and 2812 Ocean Boulevard Lot Merger** - PA2011-141
2808 and 2812 Ocean Boulevard

SUMMARY: At the direction of the City Council, the Planning Commission will reconsider Lot Merger Application No. LM2011-002 requesting approval to combine 2808 and 2812 Ocean Boulevard. The Commission will review alternative development standards proposed by the applicant to be applied to the development of the property. The Planning Commission will make a recommendation of approval or denial to the City Council, which will hear the application at a future meeting.

APPLICATION: LM2011-002

CEQA COMPLIANCE: The project is categorically exempt under Section 15305 of the California Environmental Quality Act (CEQA) Guidelines - Class 5 (Minor Alterations in Land Use Limitations).

Published Newport Beach/Costa Mesa Daily Pilot March 10, 2012

Attachment 3 : Content of March 22, 2012 Agenda Listing

ITEM NO. 4 Newport Banning Ranch - (PA2008-114)
5200 West Coast Highway

SUMMARY: A proposed planned community on a 401.1 acre project site for development of 1,375 residential dwelling units, a 75-room resort inn and ancillary resort uses, 75,000 square feet of commercial uses, approximately 51.4 acres of parklands, and approximately 252.3 acres of permanent open space.

CEQA COMPLIANCE: An Environmental Impact Report (EIR) SCH No. 2009031061 to evaluate the environmental impacts resulting from the proposed project. The EIR has been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended (Public Resources Code Section 21000 et seq.), and the State CEQA Guidelines for Implementation of CEQA (California Code of Regulations, Title 14, Section 15000 et seq.).

1) **ACTION**:

1) Receive staff report focused in Environmental Impact Report;

2) Conduct a public hearing; and

3) Continue public hearing to April 5, 2012.

Attachment 4: California Attorney General's View of Agenda Requirements

From the AG's Bagely-Keene Open Meeting Handbook:

> "The agenda items should be drafted to provide interested lay persons with enough information to allow them to decide whether to attend the meeting or to participate in that particular agenda item. Bodies should not label topics as "discussion" or "action" items unless they intend to be bound by such descriptions. Bodies should not schedule items for consideration at particular times, unless they assure that the items will not be considered prior to the appointed time. "
>
> Source: http://ag.ca.gov/publications/bagleykeene2004_ada.pdf (under "Notice and Agenda Requirements" on page 8)
>
> *Note: I have not found time to locate a similar statement by the Attorney General with regard to the Brown Act, but the statutory sections being interpreted are essentially identical in the two acts.*

Additional References/ Web Links

Suzanne Forster letter to *Daily Pilot*:

http://www.dailypilot.com/news/opinion/tn-dpt-0403-mailbag-20120403,0,2060329.story

March 22, 2012 Planning Commission agenda and staff report:

http://www.newportbeachca.gov/index.aspx?page=1328

Specifically:

http://www.newportbeachca.gov/PLN/PLANNING_COMMISSION.asp?path=/03-22-2012