

**Ranch Hills Planned Development
Planning Application NO. PA 18-0034
Final Environmental Impact Report (EIR)
County EIR No. 635
SCH No. 2021060400**

Prepared for

County of Orange Public Works

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Prepared by

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January 2023

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B	Notice of Availability (NOA)
C	Draft Environmental Impact Report (Draft EIR)
D	Comments From Persons and Organizations on the Draft Environmental Impact Report (Draft EIR)

ACRONYMS AND ABBREVIATIONS

Acronym/ Abbreviation	Meaning
AB	Assembly Bill
ACM	Asbestos-Containing Materials
BMPs	Best Management Practices
Caltrans	California Department of Transportation
CBC	California Building Code
CFC	California Fire Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
County	County of Orange Public Works, OC Development Services/Planning
DAMP	Drainage Area Management Plan
Draft EIR	Draft Environmental Impact Report
ESCP	Erosion and Sediment Control Plan
Final EIR	Final Environmental Impact Report
HAA	Housing Accountability Act
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
LBP	Lead-Based Paints
LOS	Level of Service
Manual	County of Orange's 2020 Updated Transportation Implementation Manual
MLD	Most Likely Descendant
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
NAHC	Native American Heritage Commission
NOA	Notice of Availability
NOC	Notice of Completion & Environmental Document Transmittal
NOI	Notice of Intent
NOP	Notice of Preparation
O&M	Operation and Maintenance
OBJ	Project Objective
OCFA	Orange County Fire Authority
PCB	Polychlorinated Biphenyl
RR	Regulatory Requirement

Acronym/ Abbreviation	Meaning
SB	Senate Bill
SC	Standard Condition
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coast Information Center
SWPPP	Stormwater Pollution Prevention Plan
TUSD	Tustin Unified School District
VHFHSV	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Travelled
WDID	Waste Discharge Identification
WQMP	Water Quality Management Plan

1.0 INTRODUCTION

1.1 PURPOSE

This Final Environmental Impact Report (Final EIR) has been prepared by the County of Orange Public Works, OC Development Services/Planning (County) for the Ranch Hills Planned Development Project (Project). This Final EIR has been prepared consistent with California Environmental Quality Act (CEQA) statutes (Cal. Pub. Res. Code, Sections 21000 et seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Sections 15000 et seq.), and the County of Orange 2020 Local CEQA Procedures Manual.

Before approving a project, CEQA requires that the Lead Agency prepare and certify a Final EIR per CEQA Guidelines Section 15090. As Lead Agency, the County has the principal responsibility for approval of the Project.

According to Section 15132 of the CEQA Guidelines, the Final EIR must include:

- The Draft EIR or a revision of the Draft EIR;
- Comments and recommendations received on the Draft EIR either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

1.2 FORMAT OF THIS FINAL EIR

This Final EIR consists of the May 2022 Draft EIR (Appendix C) and the following four sections:

- Section 1 – Introduction. This section describes the purpose of this Final EIR, as well as its format and contents. Section 1 also provides an overview of the environmental review process for this Project.
- Section 2 – Response to Comments. This section provides a list of the persons, organizations, and public agencies that commented on the Draft EIR. A copy of each public agency comment letter and the County’s responses to each comment received is provided in Section 2. Comments received from persons and organizations are provided in Appendix D. Section 2 of this Final EIR provides a summary of comments received from persons and organizations as well as responses grouped by theme.
- Section 3 – Draft EIR Revisions and Clarifications. This section contains minor revisions and clarifications to the information contained in the May 2022 Draft EIR.

- Section 4 – Mitigation Monitoring and Reporting Program. This section provides the Project’s mitigation monitoring and reporting program (MMRP), which is presented in table format and identifies mitigation measures for the Project, the timing of implementation for each measure, and the responsible party.

1.3 PUBLIC REVIEW PROCESS

A summary of the public review process for the Project is provided below.

Prior Initial Study/Mitigated Negative Declaration

An Initial Study/Mitigated Negative Declaration (IS/MND) was previously prepared and circulated for the Project in May 2020. A total of 223 comments were received on the IS/MND during the public review period, including two comments from public agencies and the remaining from residents and other interested persons. Thereafter, the Applicant requested and OC Development Services/Planning agreed that an EIR be prepared for the Project. The IS/MND was not scheduled for public hearing at the Planning Commission; therefore, no action was taken on the IS/MND. The IS/MND was superseded by the preparation of the Draft EIR. Written comments received on the IS/MND were incorporated into the Draft EIR; however, they are not individually addressed in this Final EIR.

Following the decision to prepare an EIR the Project name was changed from Ranch Hills Community to Ranch Hills Planned Development.

Notice of Preparation

As part of the EIR process, a Notice of Preparation (NOP) was released on June 17, 2021, beginning the 30-day public scoping period for the EIR to solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR (Appendix A). During the scoping period, the County received four public agency comment letters, one comment from a public utility, and one comment from a Native American Tribe. No scoping comments were received from any individual persons. The Draft EIR incorporated the comments received from persons and organizations in response to the NOP.

Public Review of Draft EIR

The Draft EIR was made available for public review and comment pursuant to CEQA Guidelines Section 15087. Copies of the Draft EIR and Appendices were available for an extended review period of 50 calendar days from Tuesday, May 10, 2022 to Wednesday, June 29, 2022, online at the County’s project webpage and at the following locations:

- OC Development Services/Planning Project website:
<https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/3rd-district/pa180034>

- OC Development Services/Planning, County Administration South building, 601 N. Ross Street, Santa Ana, CA 92701
- Orange County Public Library, Tustin Library, 345 E. Main Street, Tustin, CA 92780
- Orange County Public Library, Irvine Katie Wheeler Library, 13109 Old Myford Road, Irvine, CA 92602
- City of Orange Public Library, El Modena Branch Library, 380 S. Hewes Street, Orange, CA 92869

Electronic files related to this Project were also made available for download from the Project website referenced above. Written comments regarding the Draft EIR were required to be submitted no later than 5:00 PM on Wednesday, June 29, 2022, and were able to be submitted in-person, by mail and e-mail.

On May 10, 2022, at the beginning of the public review period, an electronic copy of the Draft EIR with appendices, was submitted to the State Clearinghouse located in the Governor's Office of Planning and Research along with a Notice of Availability of a Draft EIR (NOA) (Appendix B), Notice of Completion & Environmental Document Transmittal (NOC) form, and a Summary Form for Electronic Document Submittal (i.e., SCH Summary Form). Also on May 10, 2022, the NOA was mailed via United States Postal Service (USPS) certified mail to 53 public entities and interested parties, and was filed with the Orange County Clerk-Recorder and remained posted through the end of the public review period. Printed copies of the NOA were posted at two visible locations along the main driveway within the Project site and at the clubhouse cash register/concession area, and copies of the NOA were made available at the bar within the existing Tustin Hills Racquet and Pickleball Club clubhouse as well as nearby at the Kingdom Hall of Jehovah's Witnesses and posted on the outside bulletin board of the County's Hall of Administration building and at the entrance to the County Administration South building. The NOA described where the Draft EIR was available and how to submit written comments on the Draft EIR.

Final EIR

This Final EIR addresses the 205 written comments received during the public review period and includes minor revisions to the text of the Draft EIR in accordance with written comments that necessitated revisions. This Final EIR will be presented to the Planning Commission for potential certification of the environmental document prior to taking action on the Project. All agencies who commented on the Draft EIR will be provided with a copy of the Final EIR a minimum of 10 days prior to potential certification, pursuant to CEQA Guidelines Section 15088(b). The Final EIR will also be posted at the same time on the County's website at: <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/3rd-district/pa180034>.

Pursuant to CEQA Guidelines Section 15091, the County shall make findings for any significant effects identified per CEQA Guidelines Section 15382 in the Draft EIR and shall support any findings with substantial evidence in the record. After considering the Final EIR in conjunction with making findings under CEQA Guidelines Section 15091 should they be

required, the Lead Agency may decide whether or how to approve or carry out the Project. When a Lead Agency approves a project that will result in the occurrence of significant effects that are identified in the Final EIR but are not avoided or substantially lessened, the agency is required by CEQA to state in writing the specific reasons to support its action based on the Final EIR and/or other information in the administrative record. This “statement of overriding considerations” must be supported by substantial evidence in the administrative record and is prepared pursuant to CEQA Guidelines Section 15093. The Final EIR for the Project did not identify potentially significant effects that could result from Project implementation. As such, a statement of overriding considerations prepared pursuant to CEQA Guidelines Section 15093 is not required for this Project.

2.0 RESPONSE TO COMMENTS

All of the written comment letters and email comments received during the public review period by the County have been included and responded to in this Final EIR. Comments that raise significant environmental issues have been addressed in these responses. Comments that do not require a response include those that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise substantive environmental/CEQA issues; (3) do not address the Project; or (4) request the incorporation of additional information not relevant to environmental issues.

Section 15088(d) of the CEQA Guidelines, Evaluation of and Response to Comments, states:

- d) The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the Final EIR. Where the response to comments makes important changes in the information contained in the text of the Draft EIR, the Lead Agency should either:
 - 1. Revise the text in the body of the EIR; or
 - 2. Include marginal notes showing that the information is revised in the response to comments.

In the process of reviewing and responding to the comments, there were minor revisions to the text of the Draft EIR which are provided in Section 3.0, Draft EIR Revisions and Clarifications, of this Final EIR.

As discussed in more detail below in Section 3.0, none of the comments, responses, or revisions to the Draft EIR constitute “significant new information”, and none of the conditions set forth in Section 15088.5(a) of the CEQA Guidelines that would require recirculation of the Draft EIR have been met.

2.1 LIST OF COMMENTERS

A list of the persons, organizations, and public agencies that submitted written comments on the Draft EIR is provided in Table 2-1. In addition, correspondence occurred with California Department of Fish and Wildlife (CDFW) in which they requested and received field notes from the biologist’s site visit that was conducted for the Project; however, CDFW did not submit any formal comments on the Project during the public review period and documented this in written correspondence. Public agency comments are provided below in Section 2.2. Comments from persons and organizations are provided in Appendix D. Many of the issues raised by persons and other organizations were common in theme; therefore, the County has elected to address comments by topic/theme. The comments received from individuals and other organizations are summarized below by topic. For each topic, County responses are also provided.

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
<u>Public Agencies and Native American Tribes</u>	
1	Gabrieleno Band of Mission Indians - Kizh Nation
2	Orange County Fire Authority (OCFA)
3	City of Tustin, Community Development Department
<u>Persons and Organizations</u>	
4	The Gaffney Family
5	Candice Longo
6	Robert and Nancy Page
7	Behjat Zanjani
8	Lyann Courant
9	Pam Botzbach
10	Serge Tomassian
11	Melody Valencia Tustin Estates Maintenance aka Treviso Neighborhood
12	Alan Van De Vort
13	Eleni Dalis
14	Lynne Mast
15	Susan and Greg Holden
16	John and Irene Dardashti
17	Jennifer de Mahy
18	Kelly Williams
19	Kirk Watilo
20	Nancy Chapel
21	Patricia Gaffney

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
22	Amy Opfell
23	Jeff Sutherland
24	Matthew Hudack
25	Sheila Harvey
26	Michael Campbell
27	Andy Wang
28	Charles Roby
29	Dariusz and Katarzyna Tesmer
30	Nora Clayton
31	Jo Ann and Bill Dickinson
32	Lolita Tsui
33	Roe Gruber
34	Addison Adams
35	Amy Allen
36	Amy Connelly
37	Craig Sullivan
38	Eileen Braun
39	Elizabeth Leahy
40	Gary and Emily Frye
41	Hal Marshall
42	Jennifer Wilson
43	Katharine Dearstyne
44	Ken Higman
45	Kenneth Whittaker
46	Kevin Bussell
47	Kris Caiozzo

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
48	Laura Thorne
49	Leah Katnik
50	Lori Sullivan
51	Magdalena Tesmer
52	Regan Phillips
53	Sarah Williams
54	Steven Dahl
55	Trina Torres
56	William Ahern
57	Claire Annarella
58	Dan Chapel
59	Erik Tweedt
60	Mike and Kim Papac
61	Steven Wolfe
62	Sujata Kamdar
63	Bill Weinberg
64	Ann Piper
65	Sean and Kerry Tully
66	Carol and Howard Hay
67	Susan Lodge
68	George Youdeem
69	Jolanta Przywara
70	Nancy and Jessica Tan
71	Nicole Morgan
72	Susan and Jim Adams
73	Thomas and Tiffany Bulowski

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
74	Abby Green
75	Alexander Taghva
76	Andrew Strenk
77	April Nugent
78	Blair Hoppe
79	Bob and Susan Roice
80	Chris Kramer
81	Chris McCormack
82	Cristie King
83	Damon and Tracie Scott
84	Eric Foster
85	Gary and Georgia McDonald
86	John Fjeld
87	Jack Sullivan
88	Jaime Bauer
89	Jay Nugent
90	Jeff Orchard
91	Jim Crogan
92	John Green
93	John Wikle
94	Kelly Sullivan
95	Laurie Harris (1)
96	Laurie Harris (2)
97	Marek Przywara
98	Nancy Orchard
99	Nancy and Louis Sansevero

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
100	Phillip Harris
101	Sharon Cuniff
102	Mark and Stacy Lovein
103	Steve Cuniff
104	Thomas Green
105	Tom Leahy
106	Anita Prietto
107	Anne Gardner
108	Bari Brennan
109	Bob and Anita Zantos
110	Bobby Aschtiani
111	Christopher Kiehler
112	Dani O'Dell
113	Dave Kennard
114	David Harbour
115	David Holt
116	David Meredith
117	David Piper
118	Diana Neustadt
119	Don Whitlow
120	Duane Jensen
121	Emma Thurau
122	Erica Holt
123	Gilda Youdeem
124	Goretti Taghva
125	Gregory Telson

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
126	Jacqueline Hoppe
127	James Ha
128	Lino and Janet Valdivia
129	Jeremy Chen
130	Jewel Younglove
131	Joe Lee
132	John Fjeld
133	Kristie Holt
134	Leslie Weisbrich
135	Marci Weinberg
136	Marta O'Hara
137	Martin Boost
138	Melinda Anton
139	Michael and Alison Vukovich
140	Michael Yang
141	Michelle Ronan
142	Miguel Prietto
143	Monique
144	My-Le Truong
145	Nancy Fowler
146	Nancy Watilo
147	Nicole Ghotbi
148	Pablo Prietto
149	Pat Dreyer
150	Patrick Ross
151	Paul and Mary Sowa

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
152	Paul Weisbrich
153	Peter Gillin
154	Phillip Griswold
155	Carol and Rich Hoppe
156	Roxanna Bryant
157	Shawn Ghotbi
158	Stacy McKellar
159	Sue Prietto
160	Alma Cogger
161	Amy Jensen
162	Anita Sinha
163	Barry Kentrup
164	Bertha Cerda
165	Brian and Carrie Bullard
166	Bruce and Dennis Junor
167	Brian and Carrie Bullard
168	Charles Silberberg
169	Christer Fiege-Kollman
170	Colin Holt
171	Dan Erickson
172	David Grant
173	Debra and Mike Kavanaugh
174	Derrin Roe
175	Eddie Martinez
176	Elena Chung
177	Deborah Rosenthal, FKBR

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
178	Glen Duvel
179	Glen Piper
180	Greg and Carol Schinnerer
181	Greg Yi
182	Gregg Klang
183	Holly Joseph
184	Isabel Martinez
185	Jennifer Esser
186	The Scolaro Family
187	Julia Dahl
188	Julie Hellmers
189	Kami Refa
190	Kathryn Lind
191	Kirsten Antonius
192	Lauren Dahl
193	Lisa Refa
194	Lois Lee
195	Lori Chew
196	Max Reyhani
197	Meg Hennessey
198	Michael Evans
199	Pat Johnson
200	Ralph Cygan
201	Shawn Beck
202	Troy Williams
203	Victor Lee

**TABLE 2-1
COMMENT LETTERS**

Comment Letter	Name
204	Beth Moore
205	Richard and Lili Hagmann

2.2 RESPONSES TO PUBLIC AGENCY COMMENTS

As required by Section 15088 of the CEQA Guidelines, the County as Lead Agency has evaluated all 205 comments on environmental issues received from people who reviewed the Draft EIR, including comment letters received from two public agencies, one California Native American Tribe, and 202 comments from persons and organizations.¹ All of these comments will be considered as a part of the public record prior to the Orange County Planning Commission considering whether to approve or deny the Project.

Consistent with Section 15088(b) of the CEQA Guidelines, the County has responded to the two public agencies and one California Native American Tribe comment letters, and responses will be sent to these entities at least ten days prior to the County's certification of the Final EIR.

¹ Some of the commenters submitted more than one comment, so the total number of commenters is fewer than 202 persons and organizations, in addition to the two public agencies and one Tribe.

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Comment Letter #1:



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

May 13, 2022

Project Name: Ranch Hills Planned Development

Dear Kevin

Thank you for your letter dated May 10 2022 regarding AB52 consultation. The above proposed project location is within our Ancestral Tribal Territory; therefore, our Tribal Government requests to schedule a consultation with you as the lead agency, to discuss the project and the surrounding location in further detail.

1-1

Please contact us at your earliest convenience. ***Please Note: AB 52, "consultation" shall have the same meaning as provided in SB 18 (Govt. Code Section 65352.4).***

Thank you for your time,

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
1(844)390-0787

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

admin@gabrielenoindians.org

Response to Comment Letter 1 from the Gabrieleno Band of Mission Indians - Kizh Nation

Response 1-1: The commenter requested the opportunity to consult with the County regarding the Project pursuant to Assembly Bill 52 (AB 52). As described in Section 4.16, Tribal Cultural Resources, of the Draft EIR, Tribal Cultural Resources, the County had previously conducted tribal consultation for this Project in June 2019 with the Kizh Nation and consultation was concluded in August 2019. Therefore, no additional tribal consultation was required as part of the preparation of the EIR because the Project has not been changed. Therefore, this comment letter raised no new significant environmental issues, no further response is required. The environmental impact conclusion determined in Draft EIR Section 4.16.6 remains valid.

Comment Letter #2:



ORANGE COUNTY FIRE AUTHORITY

P. O. Box 57115, Irvine, CA 92619-7115 • 1 Fire Authority Road, Irvine, CA 92602-0125

Brian Fennessy, Fire Chief

(714) 573-6000

www.ocfa.org

June 21, 2022

Kevin Canning, Contract Planner
Development Services/Planning
County of Orange Public Works
601 North Ross Street, Santa Ana CA 92701
Email: Kevin.Canning@ocpw.ocgov.com

Subject: Draft Environmental Impact Report – Ranch Hills Planned Development dated May 2022

Dear Kevin Canning:

Thank you for the opportunity to review the subject document. The Orange County Fire Authority (OCFA) provides fire protection and emergency medical services response to 23 cities in Orange County and all unincorporated areas. The OCFA operates 77 fire stations throughout Orange County. Services include: structural fire protection, emergency medical and rescue services, education and hazardous material response. OCFA also participates in disaster planning as it relates to emergency operations, which includes high occupant areas and school sites and may participate in community disaster drills planned by others. Resources are deployed based upon a regional service delivery system, assigning personnel and equipment to emergency incidents without regard to jurisdictional boundaries. The equipment used by the department has the versatility to respond to both urban and wildland emergency conditions. The following are our comments:

We believe this project will have Less Than Significant Impact with the following Measures:

- The project is subject to review by the County and the OCFA for various construction document plan checks for the applicable fire life safety codes and regulations. The project will be subject to the current editions of the California Building Code (CBC), California Fire Code (CFC), and related codes.
- Structures of this size and occupancy are required to have automatic fire sprinkler systems designed per NFPA 13 as required in the current CBC and CFC.
- The two cul-de-sacs shown on Exhibit 3-1 not drawn per new code dimensions, see B-09 guide
- A water supply system to supply fire hydrants is required. Fire flow and hydrant spacing shall meet the minimums identified in the codes. Please refer to the CFC Appendix section. These tables are also located in OCFA Guideline B09.

2-1

Serving the Cities of: Aliso Viejo • Buena Park • Cypress • Dana Point • Garden Grove • Irvine • Laguna Hills • Laguna Niguel • Laguna Woods
Lake Forest • La Palma • Los Alamitos • Mission Viejo • Rancho Santa Margarita • San Clemente • San Juan Capistrano • Santa Ana
Seal Beach • Stanton • Tustin • Villa Park • Westminster • Yorba Linda • and Unincorporated Areas of Orange County

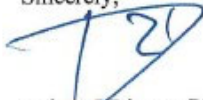
RESIDENTIAL SPRINKLERS AND SMOKE ALARMS SAVE LIVES

- Fire department access shall be provided all around the buildings.
- It is unlawful to occupy any portions of these building until County building department and OCFA have conducted final inspection and sign off.
 - **Impact:** project increases population can potentially increase workload. All projects are cumulative and OCFA uses a fair share approach to mitigate fire service response impacts and facility/equipment needs.
 - **Mitigation:** Prior to approval of any subdivision or comprehensive plan approval for the project, the designated site developer shall enter into a Secured Fire Protection Agreement with the Orange County Fire Authority.

2-1

In addition, we would like to point out that all standard conditions with regard to development, including water supply, built in fire protection systems, road grades and width, fire department access, building materials, and the like will be applied to this project at the time of plan submittal. Thank you for providing us with this information. Please contact me at 714-573-6253 if you have any questions.

Sincerely,



Robert J. Distaso PE
Fire Safety Engineer
Planning and Development
robertdistaso@ocfa.org
www.ocfa.org

Response to Comment Letter 2 from Orange County Fire Authority (OCFA)

Response 2-1: In their commenter letter, OCFA stated that they believe the Project will have less than significant impacts with implementation of County Standard Conditions including: OCFA review of construction documents; design and installation of automatic fire sprinklers; confirmation that Project roadways are designed to California Building Code (CBC), California Fire Code (CFC) requirements; installation of a water system to supply fire hydrants; a Secured Fire Protection Agreement, and final inspection and sign-off by OCFA prior to occupancy of new structures. The aforementioned County Standard Conditions will be incorporated into and be implemented as part of the Project.

In their comment, OCFA noted that the two cul-de-sacs that are shown on the site plan that was provided as Exhibit 3-1 in Section 3.0, Project Description, of the Draft EIR were not drawn per the newest code dimensions, as detailed in OCFA's B-09 Guideline, which provides guidance for Fire Master Plans for Commercial & Residential Development. OCFA's comment is noted and clarification has been added below to Table 3-1, Minor Revisions and Clarifications. During final design of the Project, plans would be modified for the two cul-de-sacs and submitted to OCFA and the County to verify adherence to the requirements contained in Guideline B-09.

Furthermore, the commenter agrees with the less than significant impact findings in Section 4.18, Wildfire, of the Draft EIR. Therefore, this comment letter raised no new significant environmental issues, no further response is required. The cumulative impact conclusion determined in Draft EIR Section 4.18.5 and project-level impact conclusion determined in Section 4.18.7 remain valid. For additional responses to comments from persons and organizations related to Wildfire, see below in Section 2.3.23 of this Final EIR.

Comment Letter #3:



Community Development Department

Remembering what connects us.

June 29, 2022

Sent via e-mail to Kevin.Canning@ocpw.ocgov.com

Mr. Kevin Canning
Contract Planner
Orange County Public Works
Development Services/Planning
P.O. Box 4048
Santa Ana, CA 92702-4048

SUBJECT: REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED RANCH HILLS COMMUNITY PROJECT

Dear Mr. Canning:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the proposed Ranch Hills Community project located at 11782 Simon Ranch Road in North Tustin. The proposed project proposes Use Permit and Vesting Tentative Tract Map to allow the development of 17 buildings consisting of 34 townhomes, three (3) separate detached single-family homes, and a recreational facility at the existing Tustin Hills Racquet Club site.

The City of Tustin offers the following comments:

General Comments

1. The proposed Ranch Hills Community is directly adjacent to the Tustin Ranch neighborhood of Treviso. Tustin Ranch is a master planned community within Tustin that is regulated by the East Tustin Specific Plan. When the Specific Plan was approved, a requirement was included that limits the height of residences on lots along the boundary between Tustin Ranch and North Tustin to a maximum of one-story in Sector 8 of the Specific Plan. In addition, those same lots were required to be a minimum of 10,000 square feet in size. These requirements were put in place to maintain compatibility between the existing North Tustin residential community and Tustin Ranch.

3-1

2. The proposed Ranch Hills Community includes attached residences that are up to two (2) stories in height and have a minimum net lot area per residence of 5,106 square feet. This height, development pattern, and density are inconsistent with the height, development pattern and density of the adjacent Treviso properties. The proposed project would allow an incompatible land use along the border between North Tustin

3-2

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Mr. Kevin Canning
Orange County Public Works
June 29, 2022
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and Tustin Ranch, and would be in conflict with the restrictive requirements that were agreed to when the East Tustin Specific Plan was adopted and that were imposed upon the developer of the Treviso neighborhood. The County of Orange should respect this land use restriction and reciprocate by not allowing incompatible residential development directly adjacent to the Treviso neighborhood and by also limiting the heights of the proposed buildings within the Ranch Hills Community along the City/County border to a maximum of one-story.

3-2
cont.

Aesthetics and Views

3. Page 4.1-4 of the EIR states that the "Project has been reviewed to ensure compliance with applicable regulations related to scenic quality, including maximum building heights" and "given that the Project would not conflict with applicable zoning and other regulations governing scenic quality, the Project would result in less than significant impacts related to this threshold, and no mitigation measures are either required or recommended." However, visual impacts to the adjacent Treviso neighborhood in Tustin were not addressed in the narrative analysis of views and aesthetics. The City of Tustin requests that the EIR be amended to include a view analysis from vantage points within Tustin to determine whether the proposed Project would have any significant impacts and whether mitigation is needed. This view analysis should include photographic simulations that show the views of the proposed buildings from various locations.

3-3

4. Although it is stated on page 4.1-3 of the EIR that "there are no designated scenic vistas or significant landforms on the Project site and surrounding areas... no scenic vista would be impacted," it is recommended that dense landscaping be required to be maintained in the proposed Ranch Hills Community along the City/County border to ensure that there are no visual impacts to the adjacent properties and to provide a greater level of privacy for the residents of the established Treviso neighborhood.

3-4

Thank you again for the opportunity to provide comments on the Draft Environmental Impact Report. The City of Tustin would appreciate receiving written responses to our comments when they become available and all future public notices regarding this project.

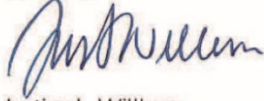
If you or your staff have any questions regarding the City's comments, please feel free to contact me at (714) 573-3115 or jwillkom@tustinca.org, or to contact Samantha Beier, Senior Planner, at (714) 573-3354 or sbeier@tustinca.org.

Community Development Department

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Mr. Kevin Canning
Orange County Public Works
June 29, 2022
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Sincerely,



Justina L. Willkom
Community Development Director

Attachment: Comment Letter from Tustin Estates Maintenance aka: Treviso

cc: Matthew S. West, City Manager
Nicole Bernard, Assistant City Manager
David Kendig, City Attorney
Douglas S. Stack, Public Works Director
Ken Nishikawa, Deputy Director of Public Works/Engineering
Kris Saldivar, Public Works Manager
Irma Huitron, Assistant Director of Community Development - Planning
Raymond Barragan, Principal Planner Consultant
Samantha Beier, Senior Planner

Community Development Department

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Tustin Estates Maintenance aka Treviso

C/O Lordon Management Company

06/10/2022

RECEIVED

JUN 17 2022

Tustin Estates

COMMUNITY DEVELOPMENT
BY: _____

To Whom it May Concern:

This letter is written on behalf of the Board of Directors, as well as the entire Treviso community.

It was brought to our attention that the proposed Ranch Hills Community project contains houses up to two stories that would back up to the Treviso Homeowners Association. When Treviso was built, the county required all homes to be single-story to back up to North Tustin. Because the proposed community would allow two-story homes, this would directly and severely interfere with the private views of these homes in Treviso.

Due to the inconsistencies in home requirements, Treviso feels as though the County of Orange should respect the original restrictions for home development, and not allow these incompatible homes to be constructed.

Thank you in advance and if you should have any questions, please feel free to contact me at (714) 505-1444 x 1002 or at mellody@mylordon.com.

Sincerely,

Melody Valencia
Community Association Manager
At the Direction of
Tustin Estates Maintenance aka Treviso

Southern California's leading property management firm. Large enough to serve, small enough to care.

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1275 Center Court Dr.
Covina, CA 91724
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17852 E. 17th St., Ste. 212
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Ventura County/Los Angeles County
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Ventura County/Santa Barbara County
300 E. Esplanade Dr., Ste. 500
Oxnard, CA 93036
(805) 751-4142

Response to Comment Letter 3 from City of Tustin

Response 3-1: The commenter stated that the Project is adjacent to the Treviso neighborhood within the City of Tustin's East Tustin Specific Plan. The commenter stated that when the East Tustin Specific Plan was approved by the City, the City required that homes in the Treviso neighborhood be limited to one-story maximum to maintain compatibility between the existing North Tustin residential community and Tustin Ranch.

This comment is noted. The properties described in this comment are within the City of Tustin and the one-story maximum requirements referenced in the comment only apply to properties within the City of Tustin and therefore do not apply to the Project site. Further response related to this topic is provided below in Response 3-2. This comment does not raise any issues regarding the content or adequacy of the analysis in the Draft EIR because CEQA does not mandate the protection of private views, no further response is necessary.

Response 3-2: This comment states that the height, development pattern, and density of development of the Project is incompatible with the adjacent Treviso neighborhood in the City of Tustin.

Along the common border with the Treviso neighborhood, the Project proposes eight paired (attached) single-family homes and one single-family detached home. The architectural design of the Project's eight paired homes is intended to appear as four single residences as shown in the exterior concept provided as Exhibit 3-2a in the Draft EIR. The eight proposed paired homes adjoining the Treviso neighborhood would therefore have a similar visual impact as would four single-family homes. Similarly, the eight proposed paired homes would be located on an area of approximately 42,000 square feet, which equates to an average lot size of 10,500 square feet per paired structure, which is similar to the lot size within the Treviso neighborhood. Finally, the height of the proposed structures would be a maximum of two stories and a maximum height of 30 feet above the proposed pad elevations, which is similar to the two-story structures within the Treviso neighborhood of Tustin.

The Project proposes an overall density of 6.29 dwelling units per acre, which would be considered a Low-Density Residential project using the City of Tustin's General Plan (City of Tustin 2018). This Low-Density Residential classification is the same density category as the Treviso neighborhood under the City's General Plan.

The proposed residences would be two stories; however, the second story elements would be limited in area to approximately 65 percent of the area of the first story, allowing the second stories to be stepped back and reducing the buildings' massing when viewed from the rear property line. The second-floor building setback as compared to first floor would vary throughout the buildings from approximately 5 feet to approximately 21 feet beyond the minimum required setback depending on location.

Furthermore, no other adjacent development areas within the unincorporated area of the County in the Tustin Ranch/East Tustin Specific Plan area have single-story-only limitations, so the requested change to the Project to require single-story units for the Project would be unprecedented.

This comment addresses the topic of land use compatibility, which is not an environmental impact pursuant to CEQA for projects within urbanized areas, such as the Project. An impact only occurs if the Project were to conflict with applicable zoning and other regulations governing scenic quality or that were adopted to mitigate an environmental effect, which the Project does not. More information on this topic is provided in Section 4.1, Aesthetics, and Section 4.10, Land Use and Planning, of the Draft EIR. Therefore, this comment raised no new significant environmental issues, no further response is required.

Response 3-3: In this comment, the City of Tustin requested that the Draft EIR be amended to include a view analysis from vantage points within the City of Tustin to determine whether the Project would have any significant impacts and whether mitigation is needed. Nearby views of the Project site from the City of Tustin are from private yards that back up to the Project site. The City of Tustin General Plan and Municipal Code contain no plans, policies, or ordinances specifically protecting private views, nor do the County of Orange General Plan or County Code of Ordinances (City of Tustin 2018, County of Orange 2022a). As such, impacts related to views from private properties would not result in a significant aesthetic impact according to CEQA. Views from streets within the Treviso neighborhood in the City of Tustin are limited to those views from Cranston Lane, Willard Avenue, and Borum Avenue are considered private views as these streets are not accessible to the general public due to the gated nature of the neighborhood. Furthermore, views from these streets would not be affected by the Project due to the presence of intervening residential structures, even when accounting for the minor change in elevation between the Project site and homes along Willard Avenue within the Treviso neighborhood.

The City's comment further requested that the view analysis include photographic simulations that show the views of the proposed buildings from various locations. Photographic simulations (e.g., renderings) of the Project from the requested perspectives have not been prepared by the Applicant; however, adequate levels of information related to the character, locations, and elevations of the Project's proposed structures are provided in Draft EIR Sections 4.1 and 4.10 to discern likely aesthetic impacts of the Project.

Response 3-4: This comment requested that dense landscaping be maintained between the Project and the City of Tustin limits. As described in Section 3.0, Project Description, of the Draft EIR, the Project would include front yard landscaping. Existing landscaping that occurs on the slope near the Tustin City boundary would be removed as part of the Project. Backyards along this area may ultimately be planted by future residents as well; however, private views from backyards within the City of Tustin that adjoin the Project site would be less screened and more exposed to development within the Project site than in existing conditions. However, these visual changes have been determined in the Draft EIR to not constitute significant impacts pursuant to the CEQA Threshold of Significance. Therefore, no visual mitigation for these private views is proposed. More information on this topic is provided in Section 4.1, Aesthetics, and Section 4.10, Land Use and Planning, of the Draft EIR. As this comment does not specifically raise any issues regarding the content or adequacy of the analysis in the Draft EIR, no further response is necessary.

2.3 RESPONSES TO COMMENTS ON COMMON THEMES

As referenced in Section 2.2 and listed in Table 2-1, 202 comment letters² were received from persons and organizations. The majority of these comments raised similar and overlapping issues. Because of this, a set of consolidated responses organized by topic were developed to address common themes thereby eliminating unnecessary repetition.³ Comments and responses for some topics are subdivided into subtopics to ensure that all aspects of comments were addressed in a clear, concise manner.

2.3.1 ZONE CHANGE

Comments Received Related to this Topic:

- Comments were received expressing opposition to a zone change for the Project.
- A comment was received stating that no notice was given to the community before County staff administratively determined that the Project was consistent with the County's General Plan.
- Comments were received that any rezoning that is allowed in North Tustin will set a precedent for other unincorporated areas of the County.
- A comment was received that the project does not conform to the surrounding single-family residences.
- Comments were received stating that the proposed zoning changes are inconsistent with the Orange County general plan.
- A comment was received stating that the rezoning process was not followed correctly. Furthermore, the comment states that taking land from low density to high density requires neighborhood input that never occurred.
 - **Response:** As described in Section 3.0, Project Description, and Section 4.10, Land Use and Planning, of the Draft EIR, the Project would not require a zone change. For additional details, also refer to the discussion in this Final EIR under Section 2.3.14, Land Use and Planning. Therefore, these comments do not present any significant new information on environmental issues that were not previously addressed in the Draft EIR, no further response is required.

² Comment letters consist of both letters and emails.

³ Section 15088 of the CEQA Guidelines provides broad guidance on the response to comments process for an EIR and therefore allows lead agencies with flexibility in their approach to responding to comments on Draft EIRs outside of what is defined in the statute. Lead agencies must evaluate comments on environmental issues and must prepare a written response to significant environment issues raised, but are allowed the flexibility to take a topical/thematic approach if they desire to do so. The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the Final EIR.

2.3.2 HOUSING ACCOUNTABILITY ACT/SENATE BILL 330

Comments Received Related to this Topic:

- A comment was received stating that the Project is not subject to the Housing Accountability Act, which the commenter describes as a new statute with limited record of implementation in the state. The comment states that to qualify for SB 330 (SB 330) review, the Project must be consistent with all objective non-discretionary standards in the County's General Plan, Zoning Code, and Subdivision Ordinance, but the commenter notes that there is a special exception if the Project meets objective General Plan requirements, but further stated the Zoning is inconsistent with the General Plan. The commenter states that the General Plan designation for the Project site allows for a wide range of residential densities (permitting 0.5 homes per acre up to 18 homes per acre), and further that the A1 zone allows agriculture, recreation, open space, and residential development. The commenter additionally states that the A1 zoning is not inconsistent with the General Plan since it allows for residential, albeit at a lesser density and with a more limited range of uses.
- A comment was received stating that the Ranch Hills Planned Development is targeting buyers with incomes beyond \$123,600 and, thus cannot invoke SB 330.
 - **Response:** The commenter mentions SB 330; however, it is actually the provisions of the Housing Accountability Act (HAA) that eliminate the need for a zone change. In their review of the Project, the County has determined that the HAA is applicable to the Project. The General Plan land use designation for the project site is 1B, which permits housing with a density between 0.5 to 18 dwelling units per acre. The Project proposes 37 homes on 5.88 acres, which results in 6.29 dwelling units per acre. Because there are no other applicable objective development standards in the General Plan, the project is consistent with all objective standards in the General Plan. Therefore, these comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required. For additional details, also refer to the discussion in this Final EIR under Section 2.3.14, Land Use and Planning.

2.3.3 PUBLIC NOTIFICATION

Comments Received Related to this Topic:

- A comment was received claiming that, as applied by the County, SB 330 effectively eliminates the Project's zoning designation without notice, hearing, or procedural protections of any kind. The commenter states that neighboring property owners were given no notice or opportunity to object to the County staff's determination that the A1 Agriculture Zoning was inconsistent with the General Plan, but that California federal and state courts have long held that neighboring property owners are entitled to notice and an opportunity to be heard on zone changes and variances. The commenter states that just because SB 330 was adopted by the State Legislature, it

does not eliminate property owners' constitutional rights to notice and hearing of development or rule changes affecting their land.

- **Response:** Public notification requirements pursuant to CEQA have been met and are described in Section 2.2.1 of the Draft EIR and in more detail in Section 1.3 of this Final EIR. Therefore, these comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.4 PROJECT OBJECTIVES

Comments Received Related to this Topic:

Project Objective 1:

- Comments were received regarding EIR Project Objective 1 (OBJ-1) in Section 1.4, Project Objectives, of the Draft EIR. OBJ-1 reads as follows: "OBJ-1: Provide homes that would meet the increased demand and shortage of housing in the North Tustin community, especially for people that want to downsize but stay in the same general area." Comments were received stating that it was the commenters' opinion that it would be unlikely that local residents would relocate to the Project due to the general community's opposition to the Project. Some commenters argued that the Project's units would be sold at a price point and with floorplans that would make downsizing for older adults already in the community unlikely.
- One comment was received stating that, in regard to OBJ-1, "There are many large residential projects in Orange County that have been recently completed or are being developed to provide significant additional housing." The commenter states that the Applicant has not demonstrated the need for these 37 units.
 - **Response:** The Applicant has conducted market research regarding the Project and determined that there would be demand for the type of housing proposed by the Project, which is why the Project is advanced. The Project site is not currently developed with housing, thus the Project would achieve EIR Project Objective OBJ-1 by providing housing units on the Project site. Draft EIR Section 4.12, Population and Housing, discusses population and housing. Therefore, these comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

Project Objective 3:

- Comments were received related to EIR Project Objective 3 (OBJ-3) in Section 1.4 of the Draft EIR. OBJ-3 reads as follows: "OBJ-3: Redevelop the Project site in a manner that reduces impacts on the circulation network, and reduces traffic and other environmental impacts of the Tustin Hills Racquet and Pickleball Club, which currently occupies the Project site." Commenters questioned the results of the Project's traffic analyses in relationship to the Project achieving OBJ-3.

- **Response:** Comments and responses related to transportation and the Project’s traffic study are provided below in Section 2.3.21 of this Final EIR (Psomas 2021). An evaluation of the Project’s ability to achieve project objectives, including OBJ-3, is provided in Section 5.0, Alternatives, of the Draft EIR. These comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.5 PROPERTY VALUES

Comments Received Related to this Topic:

- Comments were received stating that homeowners had to pay a premium to live in the area near the Project Site, and if the Project is built, they fear that the value of their homes will decrease due to the loss or alteration of private views and loss of the nearby racquet club amenity, as well as due to the additional traffic, noise, and change of character of the community that would result from the Project.
- A comment was received that the rezoning of the Project area will create a negative valuation for the surrounding neighborhoods who relied upon the zoning when making their financial decision to buy a home in a “Tustin Style Neighborhood”.
 - **Response:** These comments are noted. As discussed above in Section 2.3.1, the Project would not require a zone change. Section 15088(d) of the CEQA Guidelines, Evaluation of and Response to Comments states that the Lead Agency shall respond to comments raising significant environmental issues. Because these comments relate to property values and do not specifically raise any issues regarding the content or adequacy of the analysis in the Draft EIR, no further response is necessary.

2.3.6 APPLICABILITY OF PREVIOUSLY-RECORDED RESTRICTIVE COVENANTS ON THE PROJECT

Comments Received Related to this Topic:

- Comments were received which stated that on September 24, 1974, the prior owner of the Project site recorded a restrictive land-use covenant that restricts the use of the Project site. Commenters stated that the 1974 restrictive covenant requires that land uses on the Project site would be limited to either that of a commercial or non-commercial private membership tennis club, and in the event that the use shall be other than of a commercial or non-commercial private membership tennis club, such other use shall conform to the uses permitted in Tract #3883. Comments stated that the Project violates the 1974 restrictive land-use covenant.
 - **Response:** This topic is covered in Section 4.10, Land Use and Planning, of the Draft EIR. As described therein, the restrictive land-use covenant mentioned in this comment is a private restriction by and between the then-owner of the

tennis club (and successive tennis club owners) and the homeowners of Tract #3883. The Project site is located outside the boundaries of Tract #3883. The County is not a party to this land-use covenant, and therefore cannot enforce the agreement. County documentation reveals that the covenant was offered by the tennis club owners in exchange for homeowner support of a Zone Change proposed for the tennis club property from E4-20,000 to A1. On August 7, 1974, the Board of Supervisors approved the change in zone, but did not include the deed covenant or any condition on the development related to the covenant in its action. Regardless, the proposed residential use is consistent with the use set forth in the August 22, 1962, the Declaration of Restrictions for Tract #3883. This comment relates to the applicability of a previously-recorded and unenforceable restrictive land-use covenant and does not specifically raise any issues regarding the content or adequacy of the analysis in the Draft EIR, no further response is necessary.

2.3.7 COMMUNITY OUTREACH

Comments Received Related to this Topic:

- Comments were received stating that the Applicant had previously stated that community meetings and focus groups would be held to evaluate the future of the Project site, and that this community outreach never occurred.
 - **Response:** Public notification requirements pursuant to CEQA were met and are described in Section 1.3 of this Final EIR.

The following outreach efforts outside of the CEQA process have occurred to date:

- In late 2017 the Applicant reached out and invited Mr. Richard Nelson of Foothills Communities Association (FCA) to meet to discuss future plans for the club and to create a line of communication. According to the Applicant, at that time indicated that if there were to be development, a residential use would be preferred.
- On May 9, 2018, the Applicant held a neighborhood meeting at the Project site to discuss with the surrounding neighbors their plans for future development. At that time, the Applicant did not have any specific proposal but wanted to discuss with the neighbors a number of ideas and to solicit input.
- On May 18, 2018, the Applicant sent a thank you letter to each person who attended the May 9, 2018 meeting and provided contact information for anyone to reach out with questions. The only response the Applicant received was from an individual who indicated there was a buyer/investor who wanted to keep the tennis club open. The Applicant's follow-up conversations with this investor in the summer of 2018 indicated who was only interested in maintaining the club until

future development could occur so there was no subsequent communication with this individual.

- On April 9, 2019, August 30, 2019, and September 14, 2019, the Applicant corresponded with Mr. Rick Nelson of the FCA via email. The Applicant, Mr. Rick Nelson, and others from FCA met on September 25, 2019 to review the Project's plans. The Applicant emailed Mr. Rick Nelson later in September offering to meet again; however, no response was received to date.
- On March 1, 2020, the Applicant sent emails on multiple days to Mr. Rick Nelson to discuss the specifics of the Project.
- On August 19, 2020, the Applicant attended the North Tustin Advisory Committee (NTAC) meeting and gave a presentation to NTAC on the Project. The NTAC meeting was conducted via Zoom conference and was open to the public. No correspondence was received following this meeting.

Therefore, as shown above, outreach has occurred to interested stakeholders in the community in addition to what is required pursuant to CEQA. These comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.8 CUMULATIVE IMPACTS

Common Comments Received Related to this Topic:

- Comments were received claiming that the EIR inaccurately stated there would be a "less than a significant impact" caused by cumulative construction projects in the North Tustin area. Commenters stated the Simon Ranch Reservoir and Booster Pump Station (project CIP No. 60114) was recently constructed, which had detrimental impacts to the community including increased noise, pollution and dust from trucks, vehicles and construction equipment and activities. Commenters stated the recent impacts of the Simon Ranch Reservoir and Booster Pump Station Project, the Project's impacts related to noise and traffic would be substantial.
 - **Response:** The nearby City of Tustin Simon Ranch Reservoir and Booster Pump Station Project was evaluated as part of the cumulative impacts analyses contained in the Draft EIR. Overall information on that recent project is provided in Table 4-1, Cumulative Projects List, within Chapter 4, Impact Analysis, of the Draft EIR. Each environmental topic impact section of the Draft EIR provides analyses related to potential cumulative impacts of the Project as well as of cumulative projects where applicable. Moreover, the Booster Pump Station Project was completed in December 2016. Because these comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.9 AESTHETICS

Comments Received Related to this Topic:

Private Views:

- Comments were received that the loss of the existing open character of the Project site will create a permanent aesthetic loss to the community, as the public has for decades enjoyed the views to the Project site's park-like open space with mature palm trees that are a hallmark of the local community.
- Comments were received stating that the original developer used palm trees throughout the community's landscaping as a selling feature, and the club perimeter reflects that architectural design as well. The commenter states that although the Applicant claims that views will be improved by the removal of the palms, the public disagrees since they are part of the charm of living in this community.
- Comments state that the new 25-foot-tall townhomes would obstruct views from nearby properties.
 - **Response:** Section 4.1, Aesthetics, of the Draft EIR addresses potential aesthetic impacts of the Project. Section 4.10, Land Use and Planning, of the Draft EIR provides an evaluation of the Project as it relates to Project consistency with land use and planning policies. The City of Tustin General Plan, East Tustin Specific Plan, and City of Tustin Municipal Code contain no plans, policies, or ordinances specifically protecting private views, nor do the County of Orange General Plan or County Code of Ordinances. As a result, impacts related to views from private properties would not result in a significant aesthetic impact according to CEQA because CEQA does not mandate the protection of private views. Therefore, these comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

Exterior Lighting:

- Comments were received stating that the Project's proposed street and other exterior lighting would shine onto neighboring properties.
- A comment was received requesting to review the developer's calculations for lighting impacts related to the Project.
- A comment was received that the Draft EIR conclusion that nighttime lighting would decrease is inaccurate since the existing club is typically closed at night.
 - **Response:** As described in Section 4.1, Aesthetics, of the Draft EIR, exterior lighting within the Project Site would be limited to exterior lighting associated with each unit and street lighting required for safety. The entry monument would include landscape lighting, as permitted, and required by the County regulations and standards. Low level way-finding lighting for pedestrians/community residents would be provided in the common and recreation areas of the community for safety. Consistent with the surrounding

development and as required by the County regulations and standards, street lighting would be provided at street intersections. All exterior lighting would be designed to minimize glare and light spillage (i.e., light trespass) onto adjacent properties (i.e., shielding of streetlights). Consistent with current building code requirements and the County Standard Conditions of Approval (LG01), and as stated in Section 4.1-4 of the Draft EIR, prior to issuance of a building permit a lighting plan would be submitted and approved by the Manager of Building and Safety (see SC AES-1 in the MMRP for this requirement, which is provided in Table 4-1 of this Final EIR). These comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.10 AIR QUALITY

Comments Received Related to this Topic:

- A comment was received that construction activities will create dust, adversely affecting the air quality of the existing neighborhoods.
- A comment was received stating that the increase in traffic associated with the Project will negatively affect the air quality of the surrounding neighborhoods.
- A comment was received stating that perimeter setback will increase carbon dioxide, methane, nitrogen oxides, particulate emissions.
- A comment was received stating that the use of a concrete crushing machine in the middle of the site is not conforming, with reference to particulate emissions.
- A comment states that there will be an increase in air pollution from tennis players who will have to travel to clubs in other cities because of the Project.
 - **Response:** Air quality impacts associated with the Project were analyzed in Section 4.2, Air Quality, of the Draft EIR; the Draft EIR analyzed construction and operational related impacts, as well as cumulative impacts for this resource topic. In its analysis, Section 4.2, Air Quality, of the Draft EIR identified no significant impacts pertaining to air quality, and therefore no mitigation measures are required for the Project. These comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.11 ARCHAEOLOGICAL RESOURCES

Comments Received Related to this Topic:

- One commentor states that the Archaeological Resources analysis in the Draft EIR is flawed, because the Draft EIR concludes that the Project would result in less than significant impacts related to cultural and archaeological resources. The commentor points out that the South Central Coastal Information Center (SCCIC) records search

conducted for the Project identified a number of nearby cultural resources technical studies that have been completed, but that the analysis in the Draft EIR prematurely concludes that the Project would have less than significant impacts. The commenter goes on to state that Skyline was once an old Indian trail and that there are a lot of possibilities throughout the area for archaeological resources.

- **Response:** Section 4.4, Cultural Resources, of the Draft EIR provides an analysis of the Project's potential impacts related to cultural resources. As described in that section, with implementation of RR CUL-1 requiring that work be stopped and the Coroner contacted if human remains are discovered during construction and **SC CUL-1** requiring that an archaeologist be retained to monitor native ground disturbance, impacts related to the unanticipated discovery of unknown cultural resources within the Project site would be less than significant. These comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.12 BIOLOGICAL RESOURCES

Comments Received Related to this Topic:

- Comments were received stating that wildlife currently found in the area, including coyotes, bobcats, racoons, opossums, hawks, falcons, owls, bats, parrots, swallows, rabbits, lizards, mice, and rats would be disturbed by the Project.
- Comments were received critiquing that the biological survey for the Project occurred on one day and was not longer.
- Comments were received critiquing the accuracy of the biological survey; specifically, that it only identified lizards and rats as occurring within the Project site.
 - **Response:** Section 4.3, Biological Resources, of the Draft EIR includes an analysis of the Project's potential impacts to biological resources. In addition to the one-day site visit that was conducted by the biologist, additional secondary resources were utilized in the development of the Draft EIR's biological resources analyses. As described under Threshold of Significance question (a) of Section 4.3.6 of the Draft EIR, no suitable habitat for any special status plant or wildlife species occurs on the Project site except for marginally suitable habitat for western yellow bat, a California Species of Special Concern. Development of the Project has the potential to impact the western yellow bat through removal and/or modification of habitat, thus resulting in a potentially significant impact. **MM BIO-1** requires avoidance of tree removal during the bat maternity season as well as monitoring by a bat biologist during removal of palm trees. With implementation of **MM BIO-1**, impacts to western yellow bat would be reduced to less than significant; therefore, no impacts to any special status species would occur as a result of the Project. Therefore, these comments do not present any significant new information on environmental

issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.13 HYDROLOGY AND WATER QUALITY

Comments Received Related to this Topic:

- A comment requested more information related to Project-related water quality impacts during construction and once built.
- A comment was received stating that the Project would increase impervious surface coverage, leading to increased stormwater runoff.
- A comment was received stating that the proposed retaining wall would cause drainage problems.
- A comment stated that the Draft EIR does not accurately consider the increase in water demand associated with the Project (does not specify deficiencies).
 - **Response:** Short- and long-term water quality impacts of the Project were analyzed in Section 4.9, Hydrology and Water Quality, of the Draft EIR, as well as in the Preliminary Priority Project Water Quality Management Plan (WQMP) prepared for the Project, which is provided as Appendix J of the Draft EIR. As discussed in Draft EIR Section 4.9, Project implementation would reduce the amount of impervious surface within the Project site by 7.7 percent. As described in further detail in the Draft EIR, the Project would result in less than significant impacts related to hydrology water quality during construction and operation of the Project through mandatory implementation of a Storm Water Pollution Prevention Plan (SWPPP) and construction of proposed water quality best management practices (BMPs). Based on this, these comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.14 LAND USE AND PLANNING

Comments Received Related to this Topic:

Land Use Plan and Policy Compatibility:

- Comments were received stating that the Draft EIR relies on the Orange County General Plan land-use designation (permitting 0.5 homes per acre up to 18 homes per acre) to support the high-density development using provisions provided within Senate Bill 330 (SB 330). These commenters also stated that the EIR contains insufficient General Plan consistency analysis and that the EIR ignores compatibility issues relative to North Tustin's detailed land use planning that already exists.
- A comment states that the Project does not comply with the County's Subdivision Ordinance in that it requires at least two discretionary variances or use permits as

designed: “Without a vesting tentative tract map and use permits for Planned Development and an oversized retaining wall, the Project cannot be approved”.

- One comment states that CEQA requires the Draft EIR to “discuss any inconsistencies between applicable general plans...” [CEQA Guidelines Sec. 15125.] The comment also states that the Draft EIR for the Ranch Hills Planned Development does not discuss either consistencies or inconsistencies between the Project and the County’s General Plan, Zoning Code, and Subdivision Ordinance.
 - **Response:** The Project was evaluated for potential conflicts with land use plans, policies, and regulations in Section 4.10, Land Use and Planning, of the Draft EIR. Also, prior to circulation of the Draft EIR, as standard practice as part of the County’s review of the Project and in deeming the application complete, the County conducted a review of the Project for consistency with applicable plans, policies, and regulations.

Draft EIR Section 4.10.4 discussed the zoning for the Project site is inconsistent with the General Plan designation for the Project site due to the inconsistency with the density allowances.

The Housing Accountability Act ([HAA] Government Code, §65589.5, subdivision (j)(4)) clarifies that if the zoning standards and criteria are inconsistent with applicable, objective General Plan standards, but the development project is consistent with the applicable objective General Plan standards for the site, then the housing development project cannot be found inconsistent with the zoning standards and criteria of the zoning. Further, if such an inconsistency exists, the local agency may not require rezoning prior to housing development project approval. Therefore, no zone change is required for this Project. The local agency may require, however, the proposed housing development project to comply with the objective standards and criteria contained elsewhere in the Zoning Code that are consistent with the General Plan designation. For example, if a site has a General Plan land use designation of residential but the site is presently zoned commercial under the applicable zoning standards and criteria, then a local government can require the project to comply with objective development standards in zoning districts that are consistent with the residential designation. Under the HAA, the standards and criteria determined to apply to a housing development project must facilitate and accommodate development at the density allowed under the General Plan on the designation for the site and as proposed by the housing development project if consistent with the General Plan designation. Therefore, no zone change is required for the Project. Because these comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

Pedestrian Access and Physical Division of a Community:

- Comments were received stating that the Project would affect pedestrian access between neighborhoods through the removal of the pedestrian pathway that currently exists through the Project site between Racquet Hill and Simon Ranch Road and Pavillion Drive. Commenters state that this will cut one portion of the neighborhood off from the other and require people to drive between the two areas.
 - **Response:** This topic is addressed in Section 4.15, Transportation, of the Draft EIR. The commenters refer to an access easement that exists adjacent to the Project site, extending between two residential lots along Racquet Hill Lane. No access easement exists within the Project site. Furthermore, the pedestrian walkways within the Project site do not provide connectivity to adjacent properties. The existing off-site access easement leads to a set of stairs leading down a slope to the parking lot within the Project site. Therefore, although some individuals have used this informal path as a part of their exercise routines in the past, it is not a public road, path, or trail nor is there any easement or other legal instrument requiring that it be maintained. Once the Project is constructed, pedestrians from Racquet Hill Lane would still be able to access Pavillion Drive/Simon Ranch Road by walking along Skyline Drive. The topic of pedestrian safety is discussed in Section 4.15 of the Draft EIR with responses to comments related to pedestrian safety in Section 2.3.21 of this Final EIR. These comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.
- One comment stated that once the County approves this development, it would establish precedent for other property owners to subdivide their properties using SB 9 and SB 10 State laws and build higher densities.
 - **Response:** This comment speculates on the future usage of SB 9 and SB 10 by developers within the County. This comment is noted and has been included in the Staff Report provided to the Planning Commission. Therefore, this comment does not present any significant new information on environmental issues that was not previously addressed in the Draft EIR, no further response is required.

2.3.15 DENSITY AND CHARACTER OF DEVELOPMENT

Comments Received Related to this Topic:

- Several comments were received stating that the Project would be inappropriate because it proposes more dense development and smaller lots in a community where adjacent and nearby properties have minimum lot sizes of between 10,000 and 20,000 square feet.
- Some commenters expressed support for a Project that would develop on half acre lots consistent with the character of the adjacent parcels.

- Some commenters pointed out that the Project would include tract style housing in an area where the neighboring homes are all custom-built homes.
- Comments were received opposing the Project’s “high density”. Specifically, a comment was received stating that medium- and high-density housing similar to what is being proposed by the Project are already permitted in other areas of North Tustin as detailed in the North Tustin Specific Plan, but would be unprecedented in other areas of North Tustin.
- Comments were received that two-story homes would be inconsistent with the adjacent properties within the Treviso neighborhood of Tustin, which were all built as one-story.
- A comment was received stating that the two-story units proposed by the Project would result in a loss of privacy and serenity for neighboring properties.
- A comment was received describing the Red Hill Ridge community as a quiet residential area that is quiet and safe with minimal traffic volumes, which would be altered by the Project.
- Comments were received stating that the increased density would impact the rural atmosphere of the surrounding area.
- One commenter stated that the Draft EIR deceptively includes roads and common space in the Ranch Hills lot size/home calculation, which is inconsistent for surrounding lot size comparison
- A comment was received stating that “the project does nothing to improve the amount of affordable housing and, therefore, it should not be entitled to any density bonuses or development regulation concessions”.
 - **Response:** Aesthetics and Land Use and Planning are discussed in Sections 4.1 and 4.10 respectively of the Draft EIR. The Project proposes 34 paired (attached) single-family homes as well as three single-family detached homes. The Project’s units would be less square footage and would be on smaller lots than homes that are adjacent to the Project site. However, as discussed below and in Sections 3.5 and 4.1 of the Draft EIR, the Project has been designed to appear very similar to nearby structures.

Although the Project’s paired homes would consist of two residences, the architectural design of these paired homes is intended to appear as single residences as shown in the exterior concept provided as Exhibit 3-2a in the Draft EIR. These two-story structures would be approximately 5,000 square feet in size, which is similar to many of the homes within the County and City of Tustin next to the Project site. Therefore, the massing of the Project’s buildings would be consistent with the adjacent homes, regardless of the number of households living within the Project’s structures.

Related to building height, the Project would construct structures up to a maximum of two stories or 30-feet above the proposed pad elevations. The second story areas of proposed structures are proposed to be limited in area

to approximately 65percent of the area of the first story, allowing the second stories to be stepped back and reducing the buildings' massing when viewed from the rear property lines and from the street. The second-floor building setback as compared to first floor would vary throughout the buildings from approximately 5 feet to approximately 21 feet beyond the minimum required setback depending on location. Given that many homes in the neighborhoods surrounding the Project site have two stories, the Project proposed two story structures would not be out of character from a height perspective.

Total lot size per unit would be approximately half of the lot size for adjacent properties. However, when viewed collectively a paired residence would have roughly the same amount of open space as one typical nearby residence on a 10,000 square foot lot. Also, as noted above in response to the City of Tustin's comment letter, the Project proposes an overall density of 6.29 dwelling units per acre on the 5.88-acre Project site, which would be considered a Low-Density Residential project using the City of Tustin's General Plan (City of Tustin 2018). This Low-Density Residential classification is the same density category as the Treviso neighborhood under the City's General Plan. It is also substantially similar to the densities of development on nearby parcels within the County.

Comments related to privacy, serenity, and the rural character of the area being impacted by the Project are noted; however, these are not impacts pursuant to CEQA.

Given that these comments do not present any significant new information on environmental issues that was not previously addressed in the Draft EIR,; no further response is required.

2.3.16 GEOLOGY AND SOILS

Comments Received Related to this Topic:

- Comments were received stating that the Project's proposed retaining wall would create a safety hazard and soil stability challenges for surrounding neighbors.
- A comment was received requesting further investigation into the existing sub-grade, sub-base, and asphalt conditions of area roadways and their ability to accommodate new traffic.
 - **Response:** Section 4.6 of the Draft EIR analyzed Geology and Soils. The Project includes the addition of a retaining wall, and its impacts have been analyzed in the aforementioned section of the Draft EIR. This analysis determined that with implementation of mitigation measure **MM GEO-1**, which requires the implementation of measures identified in the geotechnical report, potentially significant impacts related to geology and soils would be reduced to less than significant. These comments do not raise significant environmental issues

beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.17 MINERAL RESOURCES

Comments Received Related to this Topic:

- A comment was received critiquing the mineral resources analysis that was provided in the Draft EIR. The commenter states that due to geological conditions in the region that are discussed in the Draft EIR as well as the existence of a historic oil well in the vicinity of the Project site, the Project that the commenter claims could potentially have an impact related to mineral resources.
 - **Response:** This comment reiterates information that was already provided in the mineral resources analysis about a nearby well in Section 2.5, Effects Not Found To Be Significant, of the Draft EIR. This comment does not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.18 NOISE AND VIBRATION

Comments Received Related to this Topic:

- A comment was received stating that the proposed retaining wall would create noise.
- A comment was received stating that the increase in traffic associated with the Project would increase noise in the area.
- A comment was received stating that the use of a concrete crushing machine during construction would result in noise.
- A comment was received stating that construction noise would have an adverse effect on the mental health of the existing community.
 - **Response:** Project construction and operation have the potential to impact noise sensitive land uses, as discussed in the Draft EIR. Noise impacts associated with the Project were analyzed in Section 4.11, Noise, of the Draft EIR and were evaluated based on compliance with both the County of Orange Noise Ordinance and City of Tustin Noise Ordinance. Estimated noise levels attributable to development of the Project at in proximity to sensitive receptors (i.e., surrounding residences) are shown in Table 4.11-4 of the Draft EIR and noise calculations are included in Appendix L of the Draft EIR. As stated in the Draft EIR, Project impacts related to noise and vibration would be less than significant, and no mitigation is required. This comment does not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.19 PUBLIC SERVICES

Comments Received Related to this Topic:

Schools:

- A comment was received stating that the Draft EIR's estimate that the Project would generate approximately 14 additional students to the school district is an underestimate of what will actually occur, since these units would likely be occupied by families.
 - **Response:** The student generation rates used in the Draft EIR analysis were provided by Tustin Unified School District (TUSD). As indicated in Section 4.13, Public Services, Threshold of Significance question (a) of the Draft EIR, using these generation factors, 14 students including 6 elementary, 4 middle school, and 4 high school age students would live within the Project. According to telephone communication with TUSD, the surrounding schools serving the Project Site would be able to accommodate the new students that would be generated by the Project. This comment does not present any significant new information on environmental issues that was not previously addressed in the Draft EIR; therefore, no further response is required.

Emergency Services

- A comment was received claiming that the Draft EIR does not accurately consider the increase in firefighting and police resources that will be required as a result of the Project (does not specify deficiencies)
- Comments were received stating that the Project would result in a strain on local emergency services, such as police and fire.
 - **Response:** As described in Section 4.13, Public Services, of the Draft EIR, coordination has occurred with Orange County Fire Authority (OCFA) and Orange County Sheriff-Coroner Department. With the mandatory implementation of County Standard Conditions and payment of fees outlined in Section 4.13 of the Draft EIR, the Project would not impact new demand for police and fire services. Therefore, these comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.20 RECREATION

Comments Received Related to this Topic:

- Comments were received stating that the Draft EIR failed to fully consider the loss of the Tustin Hills Racquet and Pickleball Club, which is the last remaining parcel in the area that is zoned for Recreation/Open Space. Commenters also state that the North Tustin area of the County is far below the County of Orange guideline for "zoned"

parkland of 2.5 acres/1,000 residents, and that the Project would further exacerbate this deficiency.

- Comments were received stating that the Draft EIR ignored the fact that the existing Tustin Hills Racquet and Pickleball Club is a recreational facility for the North Tustin area and beyond and that removing this facility will severely impact the community parks, in that groups will have to start using and driving to other locations to continue their recreational activities.
- Comments were received that tennis and pickleball facilities elsewhere in the local area would be impacted such as Tustin Sports Park, Currie Middle School, and Tustin Legacy Sports Park.
- Comments were received stating that the existing club is the practice facility for local public high school tennis teams and is used by many of the local schools for fundraising events.
- A comment was received expressing that the THRC is used as a church on Sundays.
- Comments were received that the Tustin Hills Racquet and Pickleball Club is a valuable community asset and part of the North Tustin community where people meet each other and interact, and that its removal would give people fewer chances to socialize.
- Comments were received stating that the removal of the Tustin Hills Racquet and Pickleball Club will negatively impact the health and well-being of Orange County residents.
- A comment was received stating that despite the Project's payment of park mitigation fees, the Draft EIR provides no assurances that adequate replacement park facilities will actually be provided to serve Project residents.
- Commenters state that the loss of open space (mature trees, gras, tennis courts, pool, etc.) will have a negative impact on the neighborhood.
 - **Response:** Impacts related to recreation were evaluated in Section 4.13, Public Services, and in Section 4.14, Recreation, of the Draft EIR. As disclosed in the Draft EIR, the Tustin Hills Racquet and Pickleball Club would be closed as part of the Project, which would result in the loss of this private recreational facility. This would also intuitively lead to an increased demand for other private and public recreational facilities; however, it would be speculative to hypothesize on the exact future behaviors of existing club members. The Tustin Hills Racquet and Pickleball Club is a privately owned and managed facility. Therefore, although it currently serves as a recreational facility, it is not a public park nor does it contain dedicated open space. The Project does include an outdoor pool and deck area as well as other open spaces, in addition to private yards that would be provided for each residential unit. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.21 TRANSPORTATION

Comments Received Related to this Topic:

Driveway Clarification:

- A comment was received stating that Section 3.5 of the Draft EIR incorrectly describes the access to the Project site as an intersection. The commenter provides clarification that the Project site is accessible via a driveway into a flag lot, and that the Project site has no street frontage along either Simon Ranch Road or Pavillion Drive.
 - **Response:** The Project site is accessible from a driveway that is located east of the intersection of Simon Ranch Road and Pavillion Drive. The final design of the driveway would be consistent with Note No. 10 of the OC Public Works Standard Plan 1117 which states that residential driveways serving four or more units and commercial driveways shall be treated as a local street intersection. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

Emergency Access:

- See comments provided below under Wildfire in Section 2.3.24 of this Final EIR.
 - **Response:** See response to Wildfire below in Section 2.3.24 of this Final EIR.

Traffic Study:

- Comments were received questioning why the findings of the traffic study prepared in 2021 changed from the last version of the traffic study that was circulated with the Draft IS/MND that was prepared for the Project.
- Comments were received questioning why the traffic study uses a revised methodology that resulted in a lower count. One commenter requested an independent audit of the traffic study.
- Comments were received questioning the results of driveway counts and trip generation that were presented in the traffic study. Commenters stated that they believed the existing club does not generate as much traffic as what is described, and that the Project would result in greater traffic than what is described in the Draft EIR.
- Comments were received that the existing club and the Project would be different in that the existing club closes and does not have any trips generated at night, whereas the Project would result in trips at all times of day.
- A comment was received questioning whether or not the traffic study considers traffic related to personal vehicles of construction workers.
- Comments were received stating that the traffic study should have analyzed the intersection of Southeast Skyline Drive with Red Hill Avenue.

- Comments were received claiming that the Project would violate the County's General Plan level of service (LOS) requirements.
 - **Response:** The traffic study prepared for the Project in 2021 utilizes an updated methodology that was developed in consultation with the County, which took into account the comments that were received from the public on the previous version of the traffic study that was included with the Draft IS/MND (Psomas 2021, RK Engineering 2020). The 2021 version of the traffic study was prepared consistent with the County's 2020 Updated Transportation Implementation Manual, which was adopted by the Board of Supervisors in November 2020, and which establishes the procedures and local parameters for the implementation of the County of Orange's Vehicle Miles Travelled (VMT) policy and for traffic study requirements (County of Orange 2020). Intersections evaluated and trip distribution assumptions related to the Project developed by the transportation engineer and were reviewed and approved by the County's engineering staff.

Primary differences in methodology and content between the prior 2020 version of the traffic study and the 2021 version of the traffic study include:

- As part of the Project's traffic study, a 24-hour traffic count was conducted on the access roadway for the existing Tustin Hills Racquet and Pickleball Club on Thursday, April 15, 2021. Due to COVID-19 restrictions, only the tennis courts were open at the club when the data were collected. A total of 349 daily trips occurred during the count (Psomas 2021). The prior version of the traffic study utilized Institute of Transportation Engineers (ITE) trip generation rates instead of actual traffic counts.
- The prior version of the traffic study (year 2020) assumed that the banquet facilities were in full operation each day and during morning and evening peak hours. Therefore, by collecting actual traffic counts when the banquet facilities were not in use, the 2021 version of the traffic study provides a more conservative analysis because it is based on traffic counts of existing conditions than what could potentially result from the club if those banquet facilities were in use.
- An updated land use classification for the proposed 34 attached units was utilized. Specifically, ITE LU 220 - Multifamily Housing (Low-Rise) was utilized, which is more applicable to these 34 proposed units than the ITE LU 210 - Single-Family Detached Housing rates that were used in the prior traffic study, and which thereby overestimated Project trip generation for the Project.
- Construction traffic impacts were evaluated, which found that construction trips would be fewer than daily traffic from the existing club and would also be less than the daily trips that would result from the Project occupants once the Project is constructed (Psomas 2021).

- An evaluation of vehicle miles traveled (VMT) was provided in Section 4.15(b).

Using conservative trip generation estimates, the traffic study found that the Project would reduce overall traffic (e.g., average daily traffic) from the Project site, although the number of outbound trips in the AM peak hour would increase slightly (12 trips). Based on the intersection analyses prepared as part of the traffic study, the six study area intersections currently operate with acceptable delays and are expected to continue to do so with or without the Project in the opening year. The intersections would also continue to operate acceptably during construction (Psomas 2021).

Although responses to comments are being provided above related to the methodology and results of the traffic study, consistent with Senate Bill 743 (SB 743) and CEQA Guidelines Section 15064.3, vehicular Level of Service (LOS) is no longer the metric utilized by the County for determining the significance of transportation impacts pursuant to CEQA, as specified in the County's 2020 Updated Transportation Implementation Manual. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

Traffic and Pedestrian Safety:

- Comments were received stating that more parked cars and traffic generated by the Project, combined with existing lack of sidewalks, winding roads, and lack of streetlights, would lead to increased pedestrian safety issues. Commenters state that the local roads were not designed to accommodate the additional traffic.
 - **Response:** The Project would result in reduced average daily traffic compared to the existing club as detailed in the traffic study; therefore, there would be fewer opportunities for potential traffic and pedestrian conflicts with the Project (Psomas 2021). Moreover, the Project would include the addition of sidewalks within the Project site, where there are currently no formal pedestrian facilities. In addition, primary vehicular access to the Project would be provided by an entry driveway off Pavillion Drive, which is consistent with and preserves the current configuration of the entry into the existing club in the same location.

Furthermore, the Project proposes no changes to existing roadways outside of the Project site; therefore, the Project would not result in any increased hazards due to the existing pedestrian conditions. The location of driveway access point would comply with OC Public Works roadway standards for adequate sight distance.

A search for traffic collision data using the University of California, Berkeley Transportation Injury Mapping System (documented that there were no reported collisions at the Project access or the adjacent intersection of Simon Ranch Road/Liane Lane/Valhalla Drive/Pavillion Drive from 2010 through

the end of 2021. If collisions occurred and were not reported, it is likely that said collisions were relatively minor and/or resulted in property damage only (e.g., no injuries). Thus, no significant impacts related to pedestrian safety are anticipated to result from the Project. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

Vehicle Miles Traveled (VMT):

- A comment was received stating that the Draft EIR should acknowledge that the Project is inconsistent with vehicle miles travelled (VMT) reduction goals.
 - **Response:** VMT impacts of the Project were evaluated in Section 4.5, Energy, and Section 4.15, Transportation, of the Draft EIR. As detailed in Section 4.5, Energy, of the Draft EIR, neither Project construction nor operation would result in wasteful or inefficient use of energy, including energy utilized for vehicular travel. Also, Section 4.5 provided an evaluation of the Project's consistency with energy-related plans and policies, which concludes that Project construction and operation would have less than significant impacts related to energy use, including energy related to VMT.

Also, as detailed in Section 4.15, Transportation, of the Draft EIR, the Project would result in less than significant impacts related to VMT. To determine if a detailed VMT analysis is required, the screening criteria in Appendix B of the County of Orange's 2020 Updated Transportation Implementation Manual (Manual) were reviewed (County of Orange 2020). Per the Manual, if a project is expected to generate fewer than 500 daily trips, it is assumed to have a less than significant impact related to VMT and would be exempt from having to prepare a VMT analysis. As detailed in the Project's Traffic Analysis, using conservative trip generation rates maintained by the Institute of Transportation Engineers, the Project is expected to generate 277 daily trips, which is well below the Threshold of Significance requiring a VMT analysis (Psomas 2021). Compared to existing conditions with the existing club, the Project would result in 72 fewer net daily trips (Psomas 2021). More details on VMT are provided in the Project's traffic study that was provided as Appendix K of the Draft EIR. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

Parking:

- Comments were received that the driveways for the Project's units appeared too short in length, that street parking would be insufficient, and that spillover parking outside of the development would result.
 - **Response:** The Project would include two car garages for each unit. Driveways would provide two additional on-site guest parking spaces resulting in four parking spaces for each residence. Also, on-street parking within the Project site would be allowed on one side of the street allowing for an additional 21

parking spaces. Refer to Section 3.0, Project Description, of the Draft EIR that discusses vehicular parking and provide a site plan. The proposed number of parking spaces as well as the driveway dimensions meets and exceed the County's Zoning Code. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

Construction Traffic:

- Comments were received stating that construction traffic over several years would be very disruptive to the neighborhood.
 - **Response:** As noted by the commenter, temporary construction traffic would result during Project construction. Section 5 in Appendix K, Traffic Analysis, of the Draft EIR provides a full analysis of potential impacts related to construction traffic (Psomas 2021). Construction traffic impacts were evaluated, which found that construction trips would be fewer than daily traffic from the existing club and would also be less than the daily trips that would result from the Project occupants once the Project is constructed. Environmental effects related to construction traffic were discussed in the air quality and noise analyses provided in Sections 4.2, 4.5, and 4.11 of the Draft EIR, respectively. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.22 TRIBAL AND CULTURAL RESOURCES

- A comment was received claiming that the local Kizh Nation Indian Tribe has multiple concerns regarding the Project.
 - **Response:** As described in Section 4.16 of the Draft EIR, Tribal Cultural Resources, the County has previously conducted tribal consultation for this Project in June 2019 with the Gabrieleno Band of Mission Indians – Kizh Nation, which was concluded in August 2019. As described in the Draft EIR, tribal consultation with Kizh Nation in 2019 did not reveal the existence of any known tribal cultural resources on the Project site. Kizh Nation requested tribal consultation following circulation of the Draft EIR for the Project; however, as stated above in Section 2.2 in response to Kizh Nation's comment letter, as noted in Section 4.16 of the Draft EIR, Tribal Cultural Resources, of the Draft EIR the County had previously conducted and concluded tribal consultation for this Project in 2019. Therefore, no additional tribal consultation was required as part of the preparation of the EIR. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.23 UTILITIES AND SERVICE SYSTEMS

Comments Received Related to this Topic:

- Comments were received stating that the existing gas, water, and wastewater infrastructure systems were developed based on the existing land uses. These comments state that the Project proposes greater demand than these utilities and service systems were designed for.
- A comment stated that the Draft EIR does not accurately consider the increase in water demand associated with the Project; however, no particular deficiencies in the analysis were identified in the comment.
- Comments were received opposing building new housing units during a period of drought in which the local community is being required to conserve water.
- A comment was received stating that potable and waste water tie in discussion needs more details.
- A comment was received questioning who pays for new water lines and utilities outside of the battery limits of the Project and if there will be any tax increase to residents in the area to pay for an extension of the existing water systems.
- A comment was received expressing concern that the Project will increase existing resident liability given that an overflow of the drainage ditch would now be “destroying landscaped properties with Jacuzzis, koi ponds, putting greens, etc.... instead of just tennis courts.”
 - **Response:** The Project would require utility improvements as detailed in Section 4.17, Utilities and Service Systems, of the Draft EIR. As outlined in the Section 4.17 of the Draft EIR, the Project would connect to existing utility mains adjacent to the Project and would not require off-site utility upgrades to adequately serve the Project. Section 4.17 of the Draft EIR provided a discussion of potential changes in demand as well as of the coordination that has occurred with utility service providers confirming ability and willingness to serve the Project. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

Solid Waste Reduction

- A comment was received questioning the “50 percent reuse of debris from the destruction of the facility”. The commenter states that this figure is “not supported by data” and requests that “a public monitoring committee of local residents be established to monitor the applicant’s statement of 50 percent recycle of all debris”.
 - **Response:** The comment references a mandatory requirement of the California Building Standards Code, which is implemented by the Applicant and monitored by the County during the construction phase of the Project. Solid waste reduction was discussed in Draft EIR Section 4.17. There is no

evidence that the Applicant would fail to comply with this requirement. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.24 WILDFIRE

Comments Received Related to this Topic:

- Comments were received stating that the area receives multiple evacuation notices annually for local fires.
- Comments were received stating that the Project would construct new residential units on a Project site that would not have a secondary access. Comments stated that the Project Site is located in a very high fire zone and that in the event of a fire, the additional congestion caused by these new residents could result in a safety hazard by slowing down evacuation and/or emergency response times.
- Comments were received asking if the Project's driveway and internal roads have been designed to accommodate large fire trucks and other emergency vehicles.
- Comments were received expressing concern that only one access point would be provided for the Project.
- Comments were received stating concern that the increase in residents associated with the Project will limit the ability for residents to evacuate in the case of an emergency evacuation
- Comments were received stating that the Project would eliminate an area that can be utilized by first responders as a staging area and/or relief center in the time of emergency.
- A comment was received stating that the removal of existing native vegetation will increase the danger of fire in the hills.
- A comment was received expressing concern over the materials to be used for house construction, in that they are not going to result in fire-proof homes, and that the suggested landscaping, mentioned in the Draft EIR will not retard any fires.
- A comment was received stating that the Draft EIR incorrectly measured the distance of the Project site from the Very High Fire Hazard Severity Zone (VHFHSV).
- Multiple comments expressed concerns over the Santa Ana winds. Specifically, comments stated that the proximity of the Project to the VHFHSZ, in conjunction with the Santa Ana winds and the "drought stricken vegetation in the hills", makes the development vulnerable to wildfire spread via airborne embers.
- Comments were received stating that the Project's proposed on-street parking will reduce emergency access to a single lane. Furthermore, comments were received stating that this Project's vehicular access design does not meet County fire requirements of at least two lanes of unimpeded access for fire trucks and other emergency vehicles.

- **Response:** Section 4.18 of the Draft EIR addressed Wildfire. Sections 4.8.4, Hazards and Hazardous Materials, and 4.15.4, Transportation, of the Draft EIR provided an evaluation of emergency access for the Project. As described in the Draft EIR, the Project site is surrounded by existing single-family residential development and is currently developed with the Tustin Hills Racquet and Pickleball Club. According to a review of the Fire Hazard Severity Zones Viewer maintained by CALFIRE, the Project site is outside the boundaries of a Very High Fire Hazard Severity Zone (VHFHSZ) (CALFIRE 2021). The closest designated VHFHSZ is located approximately 0.45 miles northeast of the Project site (CALFIRE 2021). As described in Section 3.0 the Draft EIR, the Project includes the development of a residential community and associated structures that would be located on a Project site that is downwind from Peters Canyon and could therefore be subject to potential direct and indirect wildfire risk, particularly during Santa Ana Wind events.

The Project's driveways and internal roadways have been designed in accordance with applicable codes and regulations, and would be submitted for final review and approval to the County and OCFA to ensure compliance with the requirements of the County of Orange Code of Ordinances, internal circulation layout requirements of the OCFA, and the 2019 California Green Building Standards Code.

Section 4.3, Biological Resources, of the Draft EIR determined that no native or otherwise naturalized vegetation types occur on the Project site.

As previously stated in the response to OCFA's comment letter, Response 2-1 in Section 2.2 of this Final EIR, County Standard Conditions, including: OCFA review of construction documents; design and installation of automatic fire sprinklers; confirmation that Project roadways are designed to California Building Code (CBC), California Fire Code (CFC) requirements; installation of a water system to supply fire hydrants; a Secured Fire Protection Agreement, and final inspection and sign-off by OCFA prior to occupancy of new structures would be implemented as part of the Project.

The existing Tustin Hills Racquet and Pickleball Club generates traffic on a daily basis by patrons, and in addition to the tennis and pickleball courts, the existing club has the potential to accommodate up to an additional 330 individuals within the Project site during the use of the Project site's existing banquet facilities. Similar to the Project, the existing club is accessible via a single driveway which is at the same location as the Project's proposed driveway. Therefore, the Project would result in similar conditions to those which currently exist related to emergency access to and from the Project site as well as for evacuation of surrounding neighborhoods during emergency situations. Furthermore, the Project would be constructed consistent with OCFA Guideline B-09 – Fire Master Plans for Commercial and Residential Development (February 2021) states in Section 2 - Fire Access Roadways: requires two access points for development's containing greater than 150 units or a multi-family residential structure containing 200 units or more

residential units. These comments do not raise significant environmental issues beyond that discussed in the Draft EIR; therefore, no further response is necessary.

2.3.25 ALTERNATIVES

Comments Received Related to this Topic:

- Comments were received expressing support for Alternative 1, which is the Increased Setback Alternative.
 - **Response:** This comment is noted. Section 15088(d) of the CEQA Guidelines, Evaluation of and Response to Comments states that the Lead Agency shall respond to comments raising significant environmental issues; this comment is noted, however, as it does not raise a significant environmental issue, no further response is necessary.

2.3.26 APPENDICES

Comments Received Related to this Topic:

- A comment was received stating that the Draft EIR failed to attach a copy of the Draft IS/MND and applicable comments as exhibits. Furthermore, the comment states that the IS/MND concluded the Project had no significant environmental impacts and that the Draft EIR reached the same conclusion with little additional analysis. The commenter suggests that the Draft EIR should have included the IS/MND as an exhibit and explained any changes in estimated Project impacts.
 - **Response:** A copy of the comments received on the Draft IS/MND were included in Appendix B of the Draft EIR. Electronic copies of the Draft IS/MND that was previously prepared for the Project were available to be downloaded at ceqanet.opr.ca.gov (SCH # 2020050195), and this document was available via CEQAnet during the entire public review period for the EIR. The relationship of the IS/MND to the Draft EIR was discussed in Section 2.2.1 of the Draft EIR. This comment does not raise a significant environmental issue, no further response is necessary.

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3.0 DRAFT EIR REVISIONS AND CLARIFICATIONS

Any revisions to the Draft EIR text, tables, and figures generated either from responses to comments or independently by the County, are stated in this section of the Final EIR. The Draft EIR text, tables, and figures have not been modified and then published separately as the Final EIR in its entirety as a single document to reflect these EIR modifications.

These Draft EIR revisions are provided to clarify and amplify the Draft EIR. Revisions may be corrections or clarifications to the text and tables of the original Draft EIR. Other revisions to the Draft EIR clarify the analysis in the Draft EIR based upon the information and concerns raised by comments during the public review period. None of the information contained in these Draft EIR revisions constitutes significant new information or revisions to the analysis or conclusions of the Draft EIR.

None of the comments, responses, or revisions to the Draft EIR constitute “significant new information”, and none of the conditions set forth in Section 15088.5(a) of the CEQA Guidelines that would require recirculation of the Draft EIR has been met.

Pursuant to Section 15088.5 (a) of the CEQA guidelines, a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. The revisions to the Draft EIR included in these EIR revisions did not change the Draft EIR in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect (including a feasible Project alternative) that the Project’s proponents have declined to implement a do not constitute “significant” new information. Therefore, recirculation of the Draft EIR is not required because the new information added to the EIR through these revisions clarify or amplify information already provided or make insignificant modifications to the already adequate Draft EIR. The EIR revisions contained in the following pages are in the same order as the information appears in the Draft EIR. Revisions in text are identified by strikeouts (~~strikeouts~~) where text has been removed and by bold underlining (**underline**) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for ease of reference.

**TABLE 3-1
MINOR REVISIONS AND CLARIFICATIONS**

Draft EIR Page Number	Section	Revision or Clarification
3-6	3.5	The internal streets for the Project would be have been designed consistent with the County of Orange standard traffic requirements for private streets. Off-street parking has been designed consistent with Section 7-9-145 of the County’s Code of Ordinances, and the Project’s internal circulation layout meets the requirements of the Orange County Fire Authority (OCFA) (County of Orange 2021c). <u>During circulation of the Draft EIR, OCFA commented that the two cul-de-sacs shown on Exhibit 3-1 were not drawn in accordance with the latest code dimensions provided in OCFA’s Guideline B-09, which provides requirements for Fire Master Plans for Commercial & Residential Development. During final design of the Project, plans would be submitted to OCFA as well as to the County to verify adherence to the requirements contained in Guideline B-09.</u>
4.1-3	4.1.4(b)	No other aspects of the park Project would otherwise exacerbate wildfire risks. Therefore, no impacts would result from the Project related to this Threshold of Significance, and no mitigation measures are either required or recommended.
4.1-3	4.1.4(b)	Due to intervening topography and development, the Project site is not visible from SR-91. Furthermore, the Project would not remove any rock outcroppings or historic buildings. Existing trees and other vegetation within the Project site would be removed; however, these trees are not within or visible from a state scenic highway.
4.8-7	4.8.4(g)	The nearest designated VHFHSZ is located within the Peters Canyon Open Space Preserve, located approximately 0.75 .45 miles northeast of the Project site (CALFIRE 2021). Therefore, the Project site and its immediate surroundings are not subject to wildland fires.
4.18-1	4.18.1	The nearest designated Very High Fire Hazard Severity Zones VHFHSZ is located within the Peters Canyon Open Space Preserve, located approximately 0.75 .45 miles northeast of the Project site (CALFIRE 2021).
4.18-3	4.18.4(a)	The nearest designated Very High Fire Hazard Severity Zones VHFHSZ is located within the Peters Canyon Open Space Preserve, located approximately 0.75 .45 miles northeast of the Project site (CALFIRE 2021).
4.18-3	4.18.4(b)	The nearest designated VHFHSZ is located within the Peters Canyon Open Space Preserve, located approximately 0.75 .45 miles northeast of the Project site (CALFIRE 2021).

**TABLE 3-1
MINOR REVISIONS AND CLARIFICATIONS**

Draft EIR Page Number	Section	Revision or Clarification
4.18-3	4.18.4(b)	Furthermore, although additional occupants would utilize the site and new buildings would be constructed, occupants would not be exposed to excessive pollutant concentrations from a wildfire or exposed to the uncontrolled spread of a wildfire.
4.18-3	4.18.4(b)	Furthermore, although additional occupants would utilize the site and new buildings would be constructed, the park would be closed during a wildfire event so it is unlikely that future park Project site users would be exposed to pollutant concentrations from a wildfire or exposed to the uncontrolled spread of a wildfire.
4.18-3	4.18.4(b)	No other aspects of the park Project would otherwise exacerbate wildfire risks. Therefore, no impacts would result from the Project related to this threshold, and no mitigation measures are either required or recommended.
4.18-4	4.18.4(c)	The Project site is not located within or near a VHFHSZ (CALFIRE 2021). The nearest designated VHFHSZ is located within the Peters Canyon Open Space Preserve, located approximately 0.75 .45 miles northeast of the Project site (CALFIRE 2021).
4.18-4	4.18.4(d)	The Project site is not located within or near a VHFHSZ (CALFIRE 2021). The nearest designated VHFHSZ is located within the Peters Canyon Open Space Preserve, located approximately 0.75 .45 miles northeast of the Project site (CALFIRE 2021).

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4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Section 21082.3 of CEQA and Section 15097 of the CEQA Guidelines require a public agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure the implementation of required mitigation measures to reduce or avoid significant environmental effects that are identified in the EIR. Also, the specific reporting and/or monitoring requirements that will be enforced during Project implementation shall also be adopted simultaneously with final Project approval by the responsible decision-making body.

The MMRP for this Project is provided as Table 4-1, beginning on the next page. The MMRP consists of mitigation measures (MMs) identified in the EIR that are required for Project implementation. The MM identifier is provided in the first column. The text of each MM is provided in the second column. The timing of each MM's implementation is provided in the third column. The agency or reporting party responsible for monitoring implementation of each MM is provided in the fourth column.

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
<i>Aesthetics</i>			
SC AES-1	Prior to issuance of any building permit, the applicant shall demonstrate that all exterior lighting has been designed and located so that all direct rays are confined to the property in a manner meeting the approval of the Manager, Building Permit Services.	Prior to construction	Orange Public Works, OC Development Services
<i>Biological Resources</i>			
MM BIO-1	To avoid impacts to roosting bats, vegetation removal shall be scheduled outside of the maternity season (i.e., April 1 through August 31). If tree clearing during the maternity season is not feasible, then pre-construction roost emergence survey will be conducted by a qualified biologist prior to Project vegetation clearing. Trees that are being used by roosting bats and those within 100 feet of an active roost will not be removed during the maternity season (i.e., April 1 through August 31) to avoid impacts on an active maternity roost, which may include juvenile bats that cannot fly. Also, a qualified bat Biologist shall be present during removal of palm trees at any time of year. During removal of palm trees, dead palm fronds shall be removed prior to felling the tree. To the greatest extent possible, the drop distance of palm fronds shall be minimized to minimize the potential for injury of bats that may be roosting in the fronds. The Biologist will examine the palm fronds immediately following their removal for torpid (dormant) bats.	Prior to construction and during construction	Orange Public Works, OC Development Services
MM BIO-2	To avoid impacts on nesting birds and raptors, vegetation removal shall be scheduled between September 2 and February 14, which is outside the peak nesting season. If vegetation removal must occur during the peak nesting season (i.e., February 15 to September 1), a pre-construction nesting bird survey shall be conducted by a qualified Biologist within 7 days prior to vegetation removal activities. This requirement shall be included as notes on the contractor specifications and shall be reviewed by the Manager of	Prior to construction, during construction (if active nests are identified)	Orange Public Works, OC Development Services

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
	<p>Building & Safety, or designee, for compliance with this requirement prior to issuance of a grading permit.</p> <p>If the Biologist finds an active nest within or adjacent to the construction area, the Biologist will identify an appropriate protective buffer zone around the nest depending on the sensitivity of the species, the nature of the construction activity, and the amount of existing disturbance in the vicinity. In general, the Biologist shall designate a buffer between 10 to 200 feet for common nesting birds and 200 to 500 feet for nesting raptors. No construction activities will be allowed within the buffer until nesting activity has ended to ensure compliance with California Fish and Game Code.</p>		
<i>Cultural Resources</i>			
SC CUL-1	<p>Prior to the issuance of any grading permit, the Applicant shall provide written evidence to the Manager, Subdivision and Grading, that the Applicant has retained a County-certified archaeologist, to observe grading activities and salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the Applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate. If the archaeological resources are found to be significant, the archaeologist shall determine appropriate actions, in cooperation with the Applicant and County, for exploration and/or salvage.</p> <p>Prior to the release of the grading bond the Applicant shall obtain approval of the archaeologist's follow-up report from the Manager, Harbors, Beaches & Parks HBP/Coastal and Historical Facilities. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification. Applicant shall offer excavated finds for curatorial purposes to the County, or its designee, on a first refusal basis. These</p>	Prior to construction	Orange Public Works, OC Development Services

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
	<p>actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the Manager, HBP/Coastal and Historical Facilities. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County of Orange or its designee, all in a manner meeting the approval of the Manager, HBP/Coastal and Historical Facilities.</p>		
RR CUL-1	<p>If human remains are encountered during excavation activities, all work shall halt in the vicinity of the remains and the Orange County Coroner shall be notified (California Public Resources Code, Section 5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner, with the aid of a County-certified archaeologist, determines that the remains are prehistoric, she/he will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. If feasible, the MLD's recommendation should be followed and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code, Section 7050.5). If the Applicant rejects the MLD's recommendations, the Applicant shall rebury the remains with appropriate dignity on the Project site in a location that will not be subject to further subsurface disturbance (California Public Resources Code, Section 5097.98).</p>	<p>During construction (if significant discovery is identified)</p>	<p>County Coroner</p>

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
<i>Geology and Soils</i>			
MM GEO-1	<p>Prior to approval grading plans, the Applicant shall demonstrate, to the satisfaction of the Manager, Building and Safety, that the recommendations in the Geotechnical Investigation, Geotechnical Investigation Update, and in any future geotechnical reports have been fully and appropriately incorporated (Geocon 2017, 2020). These recommendations include, but are not limited to, the following geotechnical areas:</p> <ul style="list-style-type: none"> • General • Soil and Excavation Characteristics • Minimum Resistivity, pH, and Water-Soluble • Grading • Slope Construction • Shrinkage • Foundation Design • Foundation Settlement • Miscellaneous Foundations • Lateral Design • Concrete Slabs-on-Grade • Preliminary Pavement Recommendations • Retaining Walls • Retaining Wall • Temporary Excavations • Stormwater Infiltration • Surface Drainage • Plan Review 	Prior to construction	Orange Public Works, OC Development Services

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
SC GEO-1	Prior to the issuance of a grading permit, the applicant shall submit a geotechnical report to the Manager, Building and Safety, for approval. The report shall include the information and be in the form as required by the Grading Code and Grading Manual. ⁴	Prior to issuance of a grading permit	Orange Public Works, OC Development Services
SC GEO-2	Prior to the issuance of the first grading permit, the project applicant shall provide written evidence to the Manager, Building and Safety, that applicant has retained a County certified paleontologist to observe grading activities and salvage and catalogue fossils as necessary. The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the fossils. If the paleontological resources are found to be significant, the paleontologist shall determine appropriate actions, in cooperation with the applicant, to ensure proper exploration and/or salvage. Prior to the release of the grading bond the applicant shall submit the paleontologist's follow-up report for approval by the Manager, Permit Services. The report shall include the period of inspection, a catalogue and analysis of the fossils found, and the present repository of the fossils. Applicant shall prepare excavated material to the point of identification and offer excavated finds for curatorial purposes to the County of Orange, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to approval by Manager, Permit Services. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the	Prior to construction	Orange Public Works, OC Development Services

⁴ The *Grading Manual* provides detailed compilation of rules, procedures, and interpretations necessary to carry out the provisions of the *OC Grading and Excavation Code*. The *Grading Manual* contains provisions specifying what needs to be addressed in geotechnical studies. Evaluation of the grading plans in compliance with the requirements of the *Grading Manual* would ensure the Project is in compliance with the *OC Grading and Excavation Code*.

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
	time of presentation of the materials to the County of Orange or its designee, all in a manner meeting the approval of the Manager, Permit Services.		
<i>Hazards and Hazardous Materials</i>			
SC HAZ-1	Applicant/operator shall store, manifest, transport, and dispose of all on-site generated waste that meets hazardous waste criteria in accordance with California Code of Regulations Title 22 and in a manner to the satisfaction of the Manager, HCA/Hazardous Materials Program. Applicant shall keep storage, transportation, and disposal records on site and open for inspection to any government agency upon request.	During construction	Orange Public Works, OC Development Services
RR HAZ-1	Transport of materials deemed as hazardous must comply with the requirements of Title 22, Division 4.5 of the California Code of Regulations, the U.S. Department of Transportation regulations in the Code of Federal Regulations (specifically, Title 49, Hazardous Materials Transportation Act and Title 40, Part 263, Subtitle C of Resource Conservation and Recovery Act), California Department of Transportation (Caltrans) standards, and Occupational Safety and Health Administration standards.	During construction	Orange Public Works, OC Development Services
RR HAZ-2	Prior to issuance of a demolition permit for any buildings or facilities, building materials shall be assessed by a qualified Environmental Professional as defined in Section 312.10 of 40 CFR Part 312 for the presence of lead-based paints (LBPs), asbestos-containing materials (ACM), and other common hazardous building materials (e.g., polychlorinated biphenyl [PCB]-containing lighting ballasts and mercury-containing light tubes and switches). If determined to be present, the Applicant shall prepare an abatement plan for their removal and safe transport in compliance with State and federal regulations, including Occupational Safety and Health Administration regulations in the Code of Federal Regulations (specifically Title 29, Part 1926) and South Coast Air Quality Management District (SCAQMD) Rule 1403. The abatement plan shall meet the satisfaction of the Manager, Orange County Health Care Agency/Hazardous Materials Program.	Prior to issuance of a demolition permit	Orange Public Works, OC Development Services

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
<i>Hydrology and Water Quality</i>			
SC HWQ-1	<p>Prior to the issuance of any grading or building permits, the applicant shall submit for review and approval by the Manager, Inspection Services Division, a Water Quality Management Plan (WQMP) specifically identifying Best Management Practices (BMPs) that will be used onsite to control predictable pollutant runoff. This WQMP shall identify, at a minimum, the routine structural and non-structural measures specified in the current Drainage Area Management Plan (DAMP). The WQMP must also:</p> <ul style="list-style-type: none"> • Address Site Design BMPs (as applicable) such as minimizing impervious areas, maximizing permeability, minimizing directly connected impervious areas, creating reduced or “zero discharge” areas, and conserving natural areas; • Incorporate applicable Routine Source Control BMPs as defined in the DAMP; and • Include an Operation and Maintenance (O&M) Plan that identifies the mechanism(s) by which long-term O&M of all structural BMPs will be provided. 	Prior to construction	Orange Public Works, OC Development Services
SC HWQ-2	<p>Prior to the issuance of any grading or building permits (for Priority Projects), the applicant shall include in the WQMP the following additional Priority Project information in a manner meeting the approval of the Manager, Inspection Services Division:</p> <ul style="list-style-type: none"> • Include post-construction Treatment Control BMP(s) as defined in the DAMP; • For applicants relying on Regional Treatment Controls, discuss applicable regional water quality and/or watershed program; and 	Prior to construction	Orange Public Works, OC Development Services

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
	<ul style="list-style-type: none"> • Include an Operation and Maintenance (O&M) Plan that (1) describes the long-term operation and maintenance requirements for post-construction Treatment Control BMP(s); (2) identifies the entity that will be responsible for long-term operation and maintenance of the referenced Treatment Control BMP(s); and (3) describes the mechanism for funding the long-term operation and maintenance of the referenced Treatment Control BMP(s). 		
<p>SC HWQ-3</p>	<p>Prior to the issuance of a certificate of use and occupancy, the applicant shall demonstrate compliance with the WQMP in a manner meeting the satisfaction of the Manager, Inspection Services Division, including:</p> <ul style="list-style-type: none"> • Demonstrate that all structural Best Management Practices (BMPs) described in the project’s WQMP have been implemented, constructed and installed in conformance with approved plans and specifications; • Demonstrate that the applicant has complied with all non-structural BMPs described in the project’s WQMP; • Submit for review and approval an Operations and Maintenance (O&M) Plan for all structural BMPs for attachment to the WQMP; • Demonstrate that copies of the project’s approved WQMP (with attached O&M Plan) are available for each of the incoming occupants; • Agree to pay for a Special Investigation from the County of Orange for a date (12) twelve months after the issuance of a Certificate of Use and Occupancy for the project to verify compliance with the approved WQMP and O&M Plan; and 	<p>Prior to operation</p>	<p>Orange Public Works, OC Development Services</p>

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
	Demonstrate that the applicant has agreed to and recorded one of the following: 1) the CC&R's (that must include the approved WQMP and O&M Plan) for the project Home Owner's Association; 2) a water quality implementation agreement that has the approved WQMP and O&M Plan attached; or 3) the final approved Water Quality Management Plan (WQMP) and Operations and Maintenance (O&M) Plan		
SC HWQ-4	Prior to the issuance of any grading or building permits, the applicant shall demonstrate compliance under California's General Permit for Stormwater Discharges Associated with Construction Activity by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number or other proof of filing in a manner meeting the satisfaction of the Manager, Building Permit Services. Projects subject to this requirement shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). A copy of the current SWPPP shall be kept at the project site and be available for County review on request.	Prior to construction	Orange Public Works, OC Development Services
SC HWQ-5	Prior to the issuance of any grading or building permit, the applicant shall submit an Erosion and Sediment Control Plan (ESCP) in a manner meeting approval of the Manager, Building Permit Services, to demonstrate compliance with local and state water quality regulations for grading and construction activities. The ESCP shall identify how all construction materials, wastes, grading or demolition debris, and stockpiles of soil, aggregates, soil amendments, etc. shall be properly covered, stored, and secured to prevent transport into local drainages or coastal waters by wind, rain, tracking, tidal erosion or dispersion. The ESCP shall also describe how the applicant will ensure that all BMP's will be maintained during construction of any future public rights-of-way. A copy of the current ESCP shall be kept at the project site and be available for County review on request.	Prior to construction	Orange Public Works, OC Development Services

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
<i>Noise</i>			
RR NOI-1	Per Chapter 6, Noise Control, Section 4616, Specific Disturbing Noise Prohibited, of the City of Tustin Municipal Code the erection, demolition, alteration, repair, excavation, grading, paving or construction of any building or site is prohibited between the hours of 6 p.m. and 7 a.m., Monday through Friday and 5 p.m. and 9 a.m. on Saturdays and during all hours Sundays and city observed federal holidays.	During construction	Orange Public Works, OC Development Services
SC NOI-1	<p>Prior to the issuance of any grading permits, the project proponent shall produce evidence acceptable to the Manager, Building Permits Services, that:</p> <ol style="list-style-type: none"> 1. All construction vehicles or equipment, fixed or mobile, operated within 1,000' of a dwelling shall be equipped with properly operating and maintained mufflers. 2. All operations shall comply with County of Orange Codified Ordinance Division 6 (Noise Control). 3. Stockpiling and/or vehicle staging areas shall be located as far as practicable from residential dwellings. <p>Notations in the above format, appropriately numbered and included with other notations on the front sheet of the project's permitted grading plans, will be considered as adequate evidence of compliance with this condition.</p>	Prior to construction	Orange Public Works, OC Development Services
<i>Transportation</i>			
SC TRA-1	Prior to the issuance of any grading permits, the applicant shall demonstrate adequate sight distance per Standard Plan 1117 at all street intersections, in a manner meeting the approval of the Manager, OC Infrastructure/Traffic Engineering. The applicant shall make all necessary revisions to the plan to meet the sight distance requirement such as removing slopes or other encroachments from the limited use area in a manner meeting the approval of the Manager, Building and Safety.	Prior to construction	Orange Public Works, OC Development Services

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure, Regulatory Requirements, and County Standard Conditions	Mitigation Measure/Project Design Feature	Timing of Implementation	Monitoring or Reporting Agency
<i>Tribal Cultural Resources</i>			
SC TCR-1	<p>If unanticipated archaeological resources or deposits are discovered during earth-moving activities, OCPW will implement the following measures. All work will halt within a 50-foot radius of the discovery. The Applicant will have a qualified professional archaeologist assess the significance of the find. If the resources are Native American in origin, the County shall coordinate with the Tribe regarding evaluation, treatment, curation, and preservation of these resources. The archaeologist will have the authority to modify the no-work radius as appropriate, using professional judgment in consultation with OCPW. Work will not continue within the no-work radius until the archaeologist conducts sufficient research and evidence and data collection to establish that the resource is either: (1) not cultural in origin; or (2) not potentially eligible for listing on the CRHR. If a potentially eligible resource is encountered, then the archaeologist and OCPW, as lead agency, in consultation with Gabrieleño Band of Mission Indians – Kizh Nation, will arrange for either: (1) avoidance of the resource, if possible; or (2) test excavations to evaluate eligibility, and if eligible, an attempt to resolve adverse effects to determine appropriate mitigation. The assessment of eligibility will be formally documented in writing as verification that the provisions in CEQA for managing unanticipated discoveries and PRC Section 5024 have been met.</p>	<p>During construction (if significant discovery is identified)</p>	<p>Orange Public Works, OC Development Services</p>

5.0 REFERENCES

- Orange, County of. 2022a (July 20, last accessed). County of Orange General Plan. Santa Ana, CA: County of Orange.
- .2022b. (May 10). Draft Environmental Impact Report. <https://ceqanet.opr.ca.gov/2021060400>
- .2022b. (May 10). Notice of Availability (NOA). <https://ceqanet.opr.ca.gov/2021060400>
- .2021 (June 17). Notice of Preparation (NOP). <https://ceqanet.opr.ca.gov/2021060400>
- .2020a (May). Draft Initial Study/Mitigated Negative Declaration for the Ranch Hills Community Project. <https://ceqanet.opr.ca.gov/2020050195/2>
- .2020 Updated Transportation Implementation Manual. Santa Ana, CA: County of Orange. <https://ocds.ocpublicworks.com/sites/ocpwoods/files/2020-12/Transportation%20Implementation%20Manual%20-%202020.pdf>
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- RK Engineering Group, Inc. 2020 (February 24). 11782 Simon Ranch Road Trip Generation Analysis, County of Orange. Newport Beach, CA: RK Engineering Group, Inc. <https://ceqanet.opr.ca.gov/2020050195/2>
- Tustin, City of. 2018 (November). General Plan. Tustin, CA: City of Tustin. <https://www.tustinca.org/DocumentCenter/View/713/City-of-Tustin-General-Plan-PDF>.

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Appendix A
Notice of Preparation

**NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)**
Planning Application No. PA180034 / VTTM 18119

FILED

JUN 17 2021

ORANGE COUNTY CLERK-RECORDER DEPARTMENT
BY: _____ DEPUTY

Date: June 17, 2021
To: State Clearinghouse, Responsible and Trustee Agencies, Interested Persons, Organizations, and Groups
From: County of Orange, OC Public Works, Development Services/Planning (Lead Agency)
Subject: Notice of Preparation of a Draft Environmental Impact Report
Title: Ranch Hills Planned Development
Applicant: Ranch Hills Partners L.P., 2454 Alton Parkway, Irvine, CA 92606
Agent: Psomas, 5 Hutton Centre Drive Suite 300, Santa Ana, CA 92707
Contact: Kevin Canning, Contract Planner, OC Public Works, Development Services/Planning
601 North Ross Street, Santa Ana, CA 92701 Phone: 714.667.8847

Public Review Period: The public review and comment period for a Notice of Preparation is 30 days. **Therefore, the public review period will be Thursday, June 17, 2021, to Monday, July 19, 2021, ending at 4:00 PM Pacific Standard Time on that day.** Please send your written response at the earliest possible date, but in no case after the close of the public review period deadline. Written responses should be submitted to the attention of Kevin Canning by any of the following methods: RanchHills@ocpw.ocgov.com, U.S.P.S. Mail, courier service, or hand-delivered to OC Public Works, Development Services/Planning at the contact address provided above.

Project Website: <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/3rd-district/pa180034>

Environmental Impact Report: The County of Orange, OC Public Works, Development Services/Planning has determined an Environmental Impact Report (EIR) is required and prepared this Notice of Preparation for the proposed Project. The County is the Lead Agency for the preparation of the Draft EIR.

Notice of Preparation: This Notice of Preparation has been prepared and distributed to the State Clearinghouse, Responsible and Trustee Agencies. to solicit guidance so that Project-related specific detail and environmental concerns relevant to each agency's statutory responsibilities are addressed in the scope and content of the Draft EIR. Public agencies should identify a contact person in their response. In addition, Interested Persons, Organizations, and Groups are requested to provide comments regarding the scope and content of the environmental information to be included in the Draft EIR.

This Notice of Preparation was sent via U.S.P.S. Certified Mail to adjacent property owners and residents, and those who have requested to be notified of any planning-related changes on this property. In addition, this Notice of Preparation was directly uploaded to the CEQAnet Web Portal in the State Clearinghouse of the Governor's Office of Planning and Research and to the County's Project website identified above.



 County Administration South
601 North Ross Street
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An Initial Study is not attached to this Notice of Preparation; however, the Initial Study/Mitigated Negative Declaration that was previously prepared and circulated in May 2020 for public review for this project is available on the County's Project website identified above.

Document Availability: This Notice of Preparation and future Draft EIR, and related documents are available for review at OC Public Works, Development Services/Planning, 301 North Ross Street, Santa Ana, CA 92701. These documents will also be provided in electronic format and will be available for download at the County's Project website identified above.

Potentially Significant Environmental Effects to be Analyzed: The proposed Project has the potential to have a significant effect on the following topical environmental factors: Aesthetics; Agriculture and Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Population and Housing, Public Services; Recreation; Transportation; Tribal Cultural Resources; Utilities and Service Systems; Wildfire; and Mandatory Findings of Significance. For each of these environmental factors, the Draft EIR will utilize Appendix G of the State CEQA Guidelines and consider all of the actions involved, including potential impacts on the Project site and any offsite impacts necessary to implement the Project, short-term construction impacts and long-term operational impacts, and cumulative impacts that could result from the combination of the Project and related projects.

Project Location and Existing Site Conditions: The Project site is located within the community of North Tustin in unincorporated Orange County at 11782 Simon Ranch Road on Assessor's Parcel Number 104-321-01, as shown in Figure 1, Regional Location Map. The Project site consists of 5.88 acres and is currently developed with the Tustin Hills Racquet Club situated within a residential setting. Currently, the tennis courts are open. The clubhouse has been closed due to the Pandemic but will reopen based on demand and in accordance with State and County guidelines. The Project site is not located within the boundaries of the North Tustin Specific Plan. Single family residential land uses surround the Project site in all directions. The rear yards of adjacent residences abut the Project site on all sides. The City of Tustin city limits are adjacent to the eastern Project site boundary. A Project Area Map and U.S.G.S Topographical Map are provided as Figures 2 and 3, respectively.

The Project site does not support any natural open space or native vegetation. Mature ornamental landscaping occurs throughout the site, which includes, but is not limited to, palm trees, pepper trees, pine trees, hedge, and turf. Storm water currently leaves the Project site via concrete drainage ditches located along the southwestern and southeastern boundaries of the Project site, which conveys flows for approximately 200 feet to a City of Tustin storm drain system.

Vehicular access to the Tustin Hills Racquet Club is located at the intersection of Pavillion Drive and Simon Ranch Road. The site is currently developed with, 11 full-sized and one half-sized (practice) tennis courts, a swimming pool with two small spas, a lawn/outdoor event area, and two single-story buildings with banquet and meeting rooms accommodating 330 individuals and administrative offices, for a total of approximately 10,000 square feet. The facility is served by a paved parking area that can accommodate approximately 127 cars. Site photographs are provided below in Figure 4.

Project Description: The Project proposes replacing the Tustin Hills Racquet Club with a Planned Unit Development consisting of 34 single-family townhome units and 3 single-family detached units for a total of 37 units. A Conditional Use Permit is required. Pursuant to Government Code section 65589.5(j)(4), a zoning change is not required for this Project because the Project is consistent with the objective General



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Plan standards and criteria but the zoning for the project site is inconsistent with the General Plan. Project site access would be provided at the intersection of Pavillion Drive and Simon Ranch Road.

Draft EIR Status: Work has commenced on preparing the Draft EIR as allowed by CEQA Guidelines Section 15082(a)(4). The Draft EIR shall not be circulated for public review until it is complete and all written comments responding to this Notice of Preparation have been received and incorporated into the Draft EIR.


Public Meetings: Public meetings and hearings have not yet been scheduled. Future meetings would include the following: Orange County Planning Commission and the North Tustin Advisory Committee (NTAC). When scheduled, the date, time, and place of these meetings and hearings would be provided on the County's Project website.


Submitted by:




Kevin Canning, Contract Planner
OC Public Works, Development Services/Planning



 County Administration South
401 North Ross Street
Santa Ana, California 92701

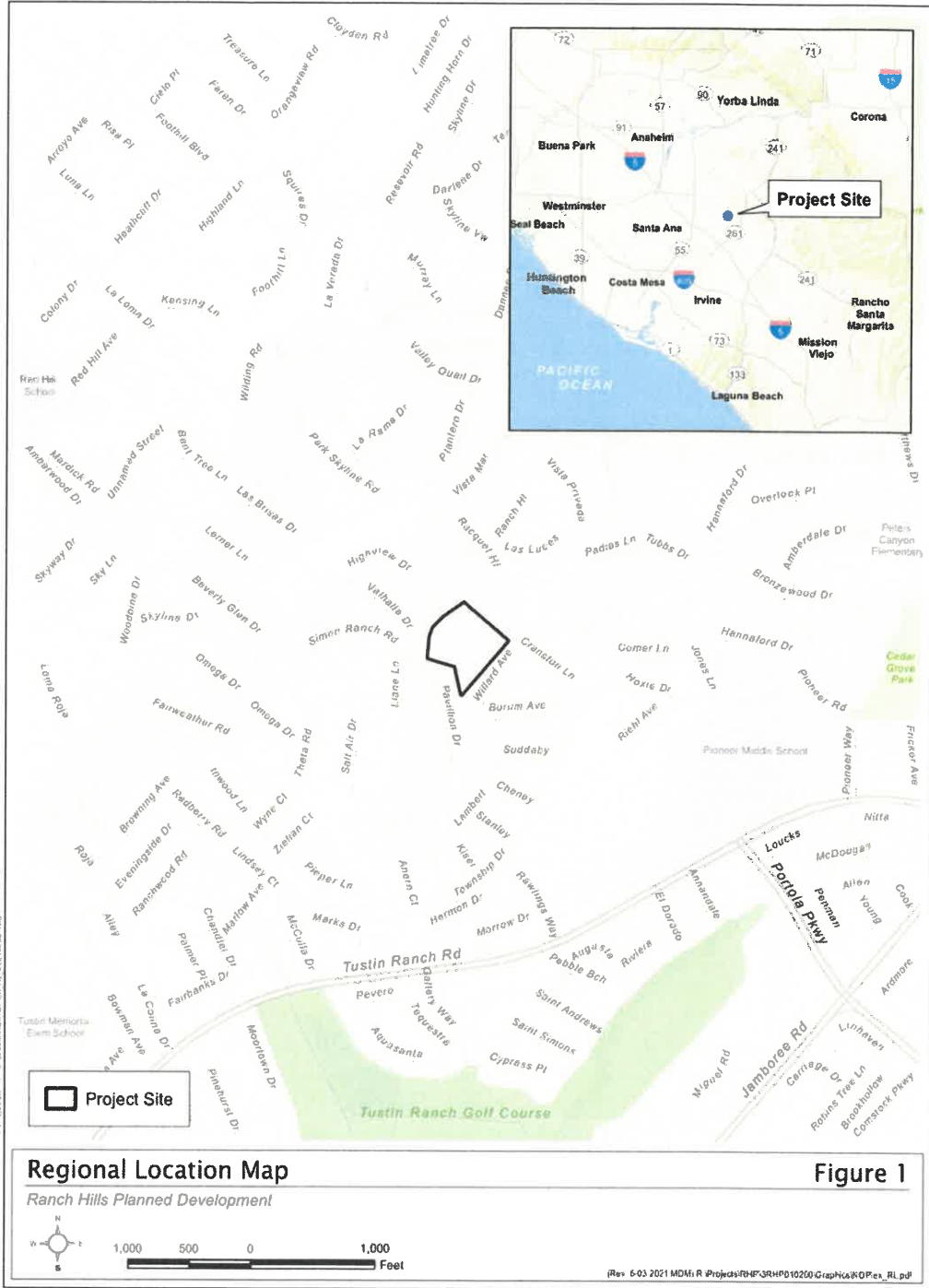
 P.O. Box 4048
Santa Ana, CA 92707 4048

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Figure 1: Regional Location Map



County Administration: South
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Figure 2: Project Area Map



 County Administration South
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 Santa Ana, California 92701

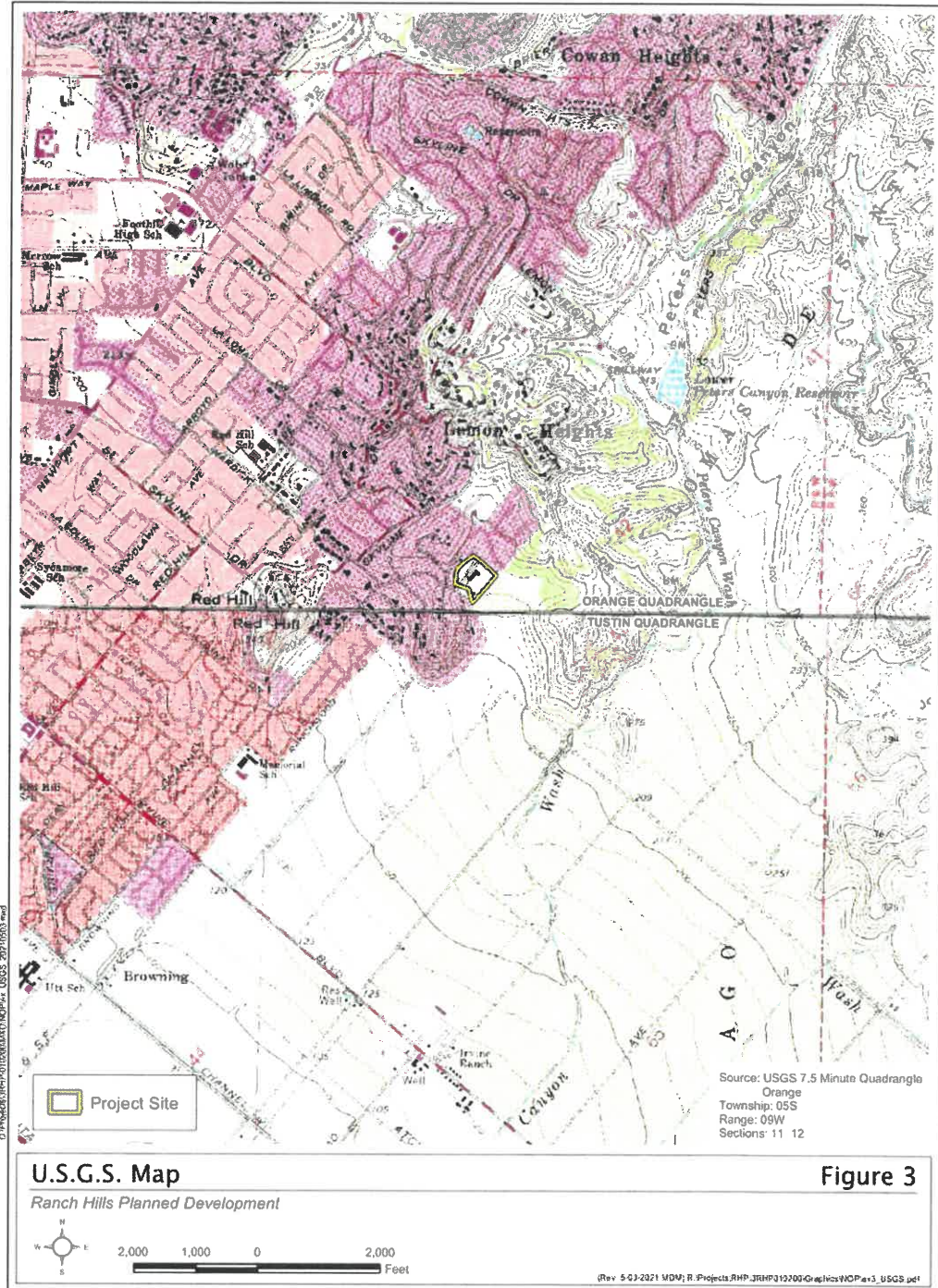
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Figure 3: U.S.G.S Topographic Map



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Figure 4: Site Photographs – Page 1 of 2



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Figure 4: Site Photographs – Page 2 of 2



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Appendix B
Notice of Availability

**PUBLIC NOTICE OF AVAILABILITY (NOA) OF A DRAFT
ENVIRONMENTAL IMPACT REPORT (EIR) POSTED**

SCH# 2021060400

DATE: May 10, 2022

MAY 10 2022

PROJECT: Ranch Hills Planned Development

ORANGE COUNTY CLERK-RECORDER DEPARTMENT

BY: SV DEPUTY

PROJECT LOCATION: The Project site is located at 11782 Simon Ranch Road east of the intersection of Pavillion Drive and Simon Ranch Road, in the North Tustin area of unincorporated Orange County, California, at the existing Tustin Hills Racquet and Pickleball Club. The Project site is identified as Assessor's Parcel Number 104-321-01. Vehicular access is provided by Tustin Ranch Road, Irvine Boulevard, Red Hill Avenue, and Browning Avenue. A map showing the location of the Project site is provided below.

PROJECT DESCRIPTION: The Project proposes a Use Permit and Vesting Tentative Tract Map (VTTM) to allow the replacement of the existing Tustin Hills Racquet and Pickleball Club with a Planned Unit Development consisting of 17 buildings containing 34 single-family townhome units and 3 single-family detached units for a total of 37 units. The Project site is zoned A1 (General Agricultural). Pursuant to Government Code section 65589.5(j)(4), a zone change is not required for this Project because the Project is consistent with objective General Plan standards and criteria but the zoning for the Project site is inconsistent with the General Plan due to the inconsistency between the zoning and General Plan the density allowances.

The Project includes a total of 169 parking spaces. Each unit would have its own two car garage as well as two additional on-site guest parking spaces within the driveway. On-street parking would be allowed on one side of each of the private streets within the Project site, which would result in an additional 21 parking spaces within the community. The Project would include open space areas, as well as a pool area with pool, jacuzzi, deck, and pool building.

PURPOSE OF THIS NOTICE: The purpose of this notice is to inform local residents, public agencies, institutions, and other interested parties that the Draft EIR is available for review and comment during the public comment period from **May 10, 2022, through June 29, 2022**. Written comments regarding the Draft EIR must be submitted no later than **5:00 PM on Wednesday, June 29, 2022**, to Kevin Canning, Contract Planner, OC Public Works, Development Services/Planning. Comments may be submitted in person at the address shown below or mailed to the P.O. Box shown below. Comments may also be submitted via email to: Kevin.Canning@ocpw.ocgov.com.

SIGNIFICANT ENVIRONMENTAL EFFECTS: Based on the analysis contained in the Draft EIR, the Project would not result in any significant and unavoidable environmental impacts. All potential environmental impacts were evaluated and determined to have no impacts, less than significant impacts, or impacts that became less than significant with imposition of regulatory requirements, County Standard Conditions, or incorporation of mitigation measures into the Project.



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HAZARDOUS WASTE SITES: The Draft EIR determined the Project site is not located on any of the lists of sites enumerated under Section 65962.5 of the Government Code.

SCHEDULED PUBLIC MEETINGS OR HEARINGS: No public meetings or hearings have been scheduled at this time.

REVIEWING LOCATIONS: The Draft EIR is available for review at the following locations:

- OC Development Services/Planning Project website: <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/3rd-district/pa180034>
- OC Development Services/Planning, County Administrative South building, 601 N. Ross Street, Santa Ana, CA 92701
- Orange County Public Library, Tustin Library, 345 E. Main Street, Tustin, CA 92780
- Orange County Public Library, Irvine Katie Wheeler Library, 13109 Old Myford Road, Irvine, CA 92602
- City of Orange Public Library, El Modena Branch Library, 380 S. Hewes Street, Orange, CA 92869

Electronic files related to this Project may be downloaded from the Project website referenced above.


POSTED


MAY 10 2022

ORANGE COUNTY CLERK-RECORDER DEPARTMENT


BY: SV DEPUTY



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601 North Ross Street
Santa Ana, California 92701

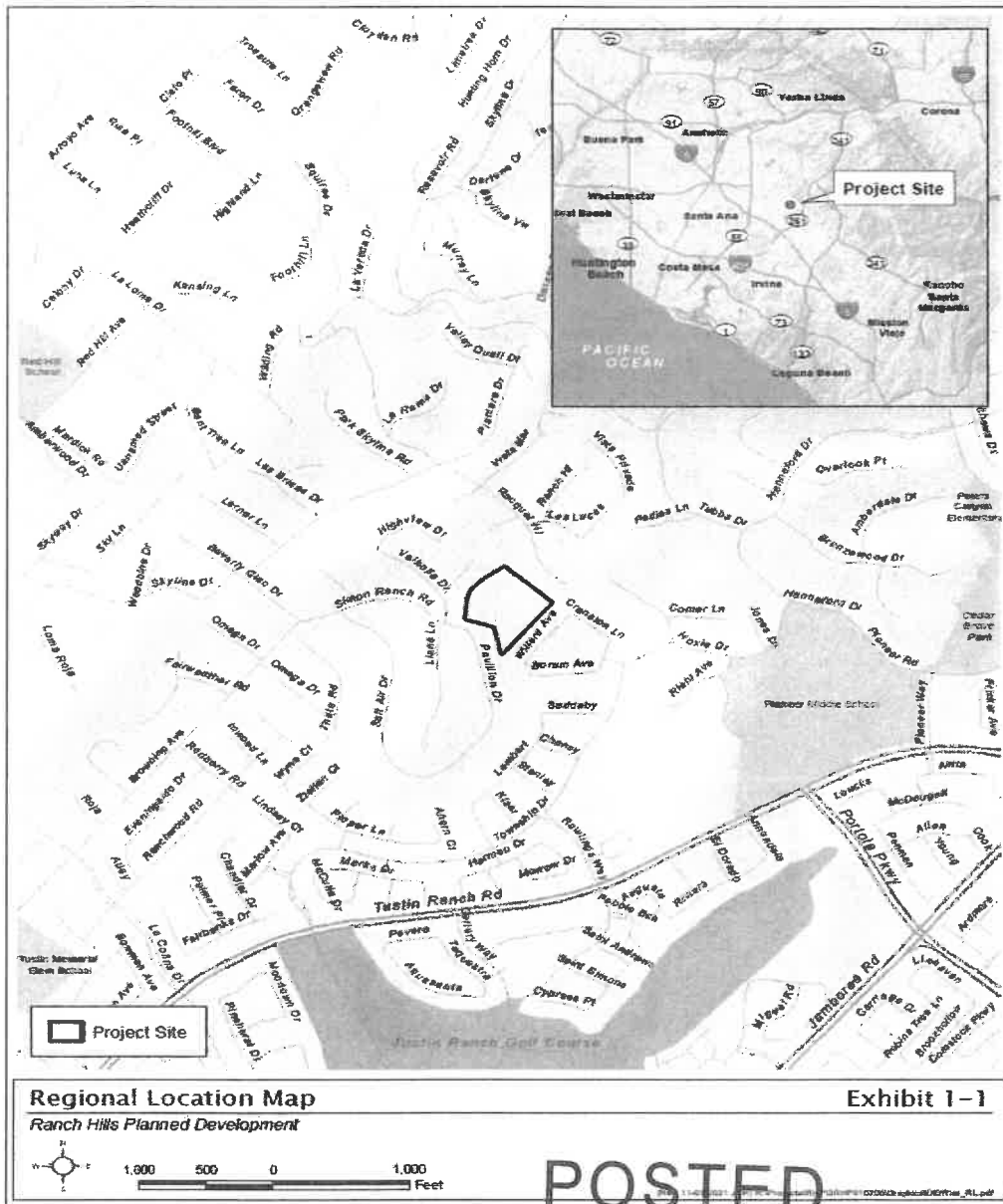
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ORANGE COUNTY

MAY 10 2022

ORANGE COUNTY CLERK-RECORDER DEPARTMENT

BY: _____ DEPUTY



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Appendix C
Draft Environmental Impact Report (Draft EIR)

Attached Electronically

Appendix D
Comments From Persons and Organizations
on the Draft Environmental Impact Report (Draft EIR)

Canning, Kevin

From: Rusty <prince@princeofpinot.com>
Sent: Saturday, May 14, 2022 2:57 PM
To: Canning, Kevin
Subject: Proposed Demolishing of Tustin Hills Racquet Club for Homes

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr Canning:

As a 43-year member of Tustin Hills Racquet & Pickleball Club (THRC), I am writing to tell you how important THRC has been to my family through those years.

We live close by and have frequently utilized the tennis courts, the pool, and the workout facility, and attended many social events there. THRC has been the center of our family's exercise and social life. My wife and I and our two sons played tennis there (and I still do) and participated in tennis competitions of all kinds through the years. We met other members and developed friendships that became a particular part of our social network in North Tustin. We moved to our current home because it was close to THRC.

THRC is the only recreational facility in the Tustin area of its size and scope. It has provided a venue for many children and adults to learn tennis, pickleball and swimming. Summer finds hundreds of young local residents participating in tennis activities. Evenings have several courts occupied by players and those taking lessons.,

Many, many women (including my spouse) have participated in tennis leagues playing other teams throughout Orange County.

THRC has hosted numerous weddings and charity events that are important to the community. It is the only venue of its type in the community.

It is unreasonable to demolish a treasured community recreational center to build a small, tightly compacted housing development that lacks any support from neighboring residents of the City of Tustin and unincorporated Santa Ana (North Tustin). There certainly is no need or interest in more housing of the proposed type

The developers claim the housing would be ideal for seniors wanting to "downsize," but the truth is that most seniors in that situation choose to buy in 55 and Over communities in Orange County and elsewhere that offer more social outlets and recreational facilities than the proposed housing.

And then there is the covenant that prevents re-zoning of the land on which THRC sits. It is my understanding that this covenant if legal, cannot be reversed.

Thanks for your consideration,

The Gaffney family: Rusty Gaffney MD, Patricia Gaffney, Garrick Gaffney,
Dane Gaffney
11582 Ranch Hill, North Tustin, CA 92705

Canning, Kevin

From: Candice Longo <1teamlongo@gmail.com>
Sent: Monday, May 16, 2022 4:27 PM
To: Canning, Kevin
Subject: Ranch hills development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello,

This is in regards to the RE zoning for tustin hills Raquet club. This club is one if not one of the last clubs that allows for outdoor programs and play for youth in our community. This would be an unprecedented impact on our local communities youth. With year round programs in tennis, swimming and pickle ball this is an outlet to our community and their Families.

Now with the growth since the pickle ball courts were installed the community and participants have really made the tustin hills Raquet club a sense of community itself.

To destroy this peaceful and beautiful area for more homes on top of homes and eliminate this outlet for the community and the youth is just shameful. I can only hope that more people and residents reach out to voice their concerns of noise, traffic, the loss of community and youth programs year round.

Candice Longo
Team Longo
Keller Williams Realty
714-501-1897
1teamlongo@gmail.com
Cal Bre# 01967455

Canning, Kevin

From: Robert <rpage2@cox.net>
Sent: Monday, May 16, 2022 4:42 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Objections to the submission of requested zoning and covenant changes for the Tustin Hills Racquet Club coming before your committee

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

5/16/2022

Attention: Kevin Canning, kevin.canning@ocpw.ocgov.com

cc...Kirk Watilo kirkwatilo@gmail.com

From: Robert and Nancy Page
2152 Salt Air Drive

Subject: Opposition to the development of the Tustin Hills Racquet Club Associated with Tract 3883

AS I will be out of the country on business when your hearing will be held I wanted to place into the records my sincere objections to the planned development proposals placed in front of your committee for consideration at the Tustin Racquet Club in unincorporated Orange County, city of Santa Ana, and with covenants and restrictions entered into by all parties including the city of Tustin that go back many years since this community was first developed, and subsequently held in place thru various attempts to make changes to its restrictions, covenants, and commitments to this community, this city, this county and all homeowners.

My family, as is the vast majority of community members surrounding the Tustin Hills Racquet Club, is adamantly opposed to the development of housing units on the property, and vigorously oppose any changes to the land covenants, restrictions, or zoning of this property as has been clearly recognized in all title reports, prior lawsuits, operating agreements for the property, and prior agreements between the developer of the Racquet Club facilities, the city, the county, the subsequent owners of the club, and the citizens affected by its presence in the community.

There are numerous reasons why we disagree with the proposal, and allow development:

1. We have rights via a recorded covenant that runs with the land (dated back to 1974), which was designed **expressly for the benefit of homeowners in Tract 3883** – not the owner of the club property. The covenant restricts land uses and was intended to preserve recreation space for the community into perpetuity (not until the club owner decides to sell and attempts to increase his profits at the community's expense).
2. The seller, Chuck Pate, acquired the property many years ago with the land use restriction in place. More importantly, Chuck purchased the property at a *price* commensurate with a tennis club with binding land use restrictions - *and* with the knowledge that these restrictions were permanent thereby impacting any future sale. Evidence of the covenant's legal enforceability and the seller's knowledge of such, occurred a few years ago when he was denied the right to construct even a cell phone tower on the site. Clearly, the seller was aware of the limitations imposed by the covenant and yet he made a bet that it would be disregarded as he (and Peter) pursued their plans.

3. What Chuck and now Peter are attempting to do is change the existing code and ignore the existing covenant for **their profit** - at the **community's expense**. This is a game-changer.
4. Property owners surrounding the club (Tract 3883), the Racquet Hill community and beyond have property rights under the zoning code. Residents purchased homes with the existing zoning code in place, and many paid a premium to overlook the tennis club (vs. a housing development). An up-zoning and redevelopment of this site immediately devalues the homes in the community and homes surrounding the club will be the most impacted. Chuck and Peter were not concerned with the financial impact to these homeowners when they embarked on their rezoning campaign.
5. The THRC is a precious recreation asset to the community (the only zoned recreation parcel in North Tustin). We have no other land parcels within North Tustin zoned for recreational use and the benefit it provides to the community FAR outweighs what a developer proposes to add.
6. ANY rezoning of infill neighborhoods sets a dangerous precedent for all unincorporated areas and opens the door to more unwanted redevelopment in our community. ANY density discussion signals (wittingly or not) a receptivity by the community to a zone change. Once that door is opened, negotiation and bargaining begin (i.e. Sheldon project). We know that developers expect this negotiation and plan accordingly via "Best Case" and "Most Probable" investment scenarios.
7. Further we disagree with the assumptions raised related to the traffic studies. Where is a secondary fire exit from said property located, and what is presented is a significant risk to all the neighboring properties as it creates a significant bottleneck exiting the community due to this lack of a secondary fire exit. In fact the risk to the new owners would be very high due to the design, and added need for adequate roadways exiting the community. Adding the number of cars to this community during a crisis / Fire could cause significant risk to both those new homeowners and the exiting homes in the community. Already we have multiple cut de sacs, and a circular road that all funnel into ONE ROAD EXIT from the community.
8. We disagree that any changes can be made to the title and covenants already approved for this property as they have been clearly negotiated by the original develop as well as accepted fully by the subsequent property owners.
9. We disagree with the pure land and money grab that the developers are attempting to achieve while having SIGNIFICANT negative impact on the current club members, homeowners surrounding the club as well as the community as a whole.
10. We believe it will have a negative impact on property values to build a high-density project within the confines a single family community with very strict guidelines related to lot size, and type of construction.
11. Views will be impacted of existing homeowners who have paid a premium for their homes based on the existence of those views from their property.
12. Past litigation has already proven that the property could not install cell towers as it did not fit within the title and covenants that exist for the property, and proven in court, so what makes this different....a precedent already exists saying o changes are allowed.
13. Again with a single road access to this entire community how does this project affect it.
 1. Where is the mitigation for Evacuation Concerns with the increased traffic loads, and multiple streets filing into one main artery. Remember the fires of the 70's and 80's and the risk to this neighborhood.
 2. Construction traffic can severely affect our roadways and cause significant damage
 3. Construction crews will significantly affect traffic during construction, and parking will become a major issue for most homeowners adjacent to the club location.
 4. This is a family neighborhood and this type of traffic will have a major safety impact on our children in this community
 5. Noise will affect every home along all of the access roads to the property and those home owners who live immediately adjacent to the club.
 6. Streets affected include: LaColina, Browning, Skyline Drive, Beverly Glen, Racquet Hill, Pavilion, Salt Air Drive, Leanne Lane, Omega, Lerner, Simon Ranch, Valhalla, Outlook, Highview, and other neighboring streets and neighborhoods.
 7. What is the increase in traffic count that will now be added to stoplights at Browning and Irvine, or LaColina and Tustin Ranch Road? The increased traffic on LaColina and Browning up onto Simon Ranch

Road...where is the traffic study looking at the impact to those arteries and how it affects the community in general.

14. This has been a special community asset that many homeowners chose this neighborhood for. Many families have raised their children with the Racquet Club a part of their family life. To take that away takes away the passionate commitment that those community members have to support what is truly a special part of the North Tustin area.
15. Greed should not prevail. This community has tried to meet with the prior owner and during the sale process presenting alternatives to the efforts presented this investor group. Proposals have also been made to the prior property owner giving him fair consideration for the property which would have allowed it to rain as is for the foreseeable future while also improving the facilities significantly and they were ignored all in their greed to maximize profits with no consideration for the community surrounding this wonderful amenity that has existed for years in its present form.
16. Lastly, neighbors have been incensed from the very beginning of this process at the arrogance of the developers to not include the community in their discussions. Yes, we have had meetings, but those who attended were never invited by the developer it is only the homeowners uniting to make sure we all were heard that forced the developer to meet with us. Their promises for full and complete presentation of the facts and expectations for the property also have never been lived up to by the developer and their partners. They have constantly worked to go around the community to achieve their goals, and they are once again doing that to us as they file this EIR to you for consideration.

PLEASE STOP THIS PROJECT WHICH IS NOT IN THE BEST INTEREST OF THIS COMMUNITY, CITY, OR COUNTY. Don't let the greed of the developers and the greed of the city to increase its tax base over shadow the negatives that this project brings to Santa Ana, Tustin, and North Tustin communities.

In summary, my families focus remains the preservation of the existing zoning for the THRC site. There are no grounds for a zone change and we have further protections under the restricted land use covenant. The bottom line is Chuck paid a "tennis club price" for a property with legal restrictions that ensured its continued use permanently as such. Peter Zehnder and his investors (David Beauchamp) were well aware of the covenant and knew precisely what kind of development was permitted under the existing zoning code and covenant. Although Zehnder and Beauchamp were very well informed of the facts and our overwhelming opposition, they chose to gamble and purchase the property anyway. Nonetheless, this in NO WAY obligates us to accommodate or even entertain this request for a zone change or be concerned with potential development profits. We have rights (and home values) that must be protected as well.

I respectfully ask, demand, that you refuse any consideration to change for this amazing legacy of Tustin, the county of Orange, and this community. This is truly a unique City, and community asset that fits within our community and their request for further development should be denied fully by your committee.

Sincerely,

Robert and Nancy Page
2152 Salt Air Drive
Santa Ana, CA 92705

[Robert J. Page](#)

Canning, Kevin

From: Behjat Zanjani <bzanjani@iemcm.com>
Sent: Wednesday, June 1, 2022 4:50 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Kevin, I am writing you to voice my objections to the proposed development of 37 dwellings, 74 garage parking spaces, and 74 additional driveway parking spaces at 11782 Simon Ranch Road.

I have lived at 2091 Salt Air Dr. for the past 19 years and enjoyed the quiet and serene community. This area is getting increasingly congested with growing households and automobiles. We have only one emergency exit road for the entire Simon Ranch, Salt Air, and Pavilion. The proposed development will add at a minimum 148 residents (assuming 4 family members per household) and potentially another 148 automobiles to this already congested area. This increased traffic will negatively impact the well-being, health, and safety of the current residents in this community. I have a 94-year old mother who lives with me. In case of a fire or earthquake, she has to wait behind rows of automobiles to exit the area to safety.

Please stop this proposed development.

Regards,
Behjat Zanjani
2091 Salt Air Dr.
Santa Ana, CA 92705
Mobile: (714) 488-3056

Canning, Kevin

From: Lyann Courant <lyann@advantageman.com>
Sent: Wednesday, June 1, 2022 12:57 PM
To: Canning, Kevin
Cc: Mike Collins
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am writing about the proposed development at the Tustin Hills Racquet Club Property. I have read the EIR and am in opposition to the approval of this project for several reasons. One of my main concerns is the fire access and safety of having a high density project in this locations. Also, right now the property is zoned for and serves as a recreational community resource which benefits the area at large. There is no reason to change the zoning other than the financial benefit to the proposed developer. I hope you will put the needs, wishes and preferences of the local community ahead of the developer who bought the property with the full knowledge that it is zoned for recreational use.

Sincerely

Lyann Courant
73 Briar Lane
Irvine, CA 92602

Canning, Kevin

From: Rich Botzbach <smylmkr@yahoo.com>
Sent: Saturday, June 4, 2022 10:48 AM
To: Canning, Kevin
Subject: Fw: RE:Tustin Hills Racquet Club EIR

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Kevin Canning and Orange County Planning Officials,

I am writing to you regarding the EIR report for the development of the Tustin Hills Racquet Club. I have lived in this neighborhood for more than 20 years and in Orange County for 48 years. I actually had a horse in my backyard as a kid and rode all over Tustin hills. It was so peaceful and relaxing. Over the years, I have seen an increase in population in this area that has pushed people into living in tighter quarters, more traffic and conflict. A healthy community is one that has space between their neighbors. You can drive anywhere in Orange County and immediately feel the difference when you travel from low density to higher density living environments. The higher density always has more traffic creating stress and an increase in conflict. Adding 37 new homes to this neighborhood will create stress and increase conflict not only because of the increased density but also because you are taking away a place to exercise and release stress and resolve conflict.

What you are proposing would be like if I decided to demolish my house and put in two townhomes. This would absolutely increase traffic, conflict and stress on my street. Multiply traffic, stress and conflict by 37 for the Tustin Hills Racquet Club project.

One of our families favorite things to do after work/school is to take our dog for a walk. The only safe way for us to walk outside our direct neighborhood is to walk through racquet club. If you build this development we will be forced to walk on Skyline which is a narrow winding road and is not safe for kids and dogs. This road will be even worse as there will be an increase in traffic traveling on it if you allow this development.

The EIR woefully underestimates the amount of traffic that will increase due to this project. The people in these townhomes will be driving multiple times back and forth to take and pick up their kids from school alone.... not to mention going to back and forth to work, shopping trips and taking kids back and forth to after school activities.

The most disturbing part of this project is that you are putting all the residents in this area at risk in an emergency. There is only one way out... down Simon Ranch Rd and in an emergency like a fire or earthquake you are creating a bottle neck that will put everyone in Tustin Hills at risk.

Our community needs Tustin Hills Racquet Club to remain recreational/agricultural! In the 1980's there were plans to run the 261 tollroad through Peter's canyon. The community rallied together and the officials listened! What resulted was the creation of Peters Canyon Regional Park. More than 20 years later, this is a very popular and busy park enjoyed by people from all over Orange County and beyond! Please listen to the community around Tustin Hill's Racquet Club and keep this a agricultural/recreational zone.

Sincerely,



SAVE OUR PARK—Volunteers from the Rancho 4H program carry picket signs in support of the Peters Canyon Regional Park last week on Newport Blvd. Passing motorists slowed for crossing horses, goats and dogs led by the children and Foothill Communities Assn. volunteers Chuck Potter and Carolyn Schlee who coordinated the event. "We need to start preserving our environment before its too late," Potter said. NEWS Photo by Bob Haskins

Peters Canyon Park Decision Postponed

The fate of Peters Canyon Park is still unknown as the Board of Supervisors delayed action on the matter for four months in order to continue negotiations with the Irvine Co., owner of the land in the Cowan Heights area of North Tustin.

Supervisor Ralph Diedrich proposed the delay stating he felt that further negotiations with the Irvine Co. could be fruitful in "working on potential development of a plan that will save the lake."

Diedrich noted that he had received a letter from Peter Kremer, president of Irvine Co., stating that water would be kept flowing in Upper Peters Canyon Lake at least until Dec. 1. The previous date had been Oct. 16. The lake in the past has been used by the Irvine Co. for irrigation purposes, however, with the completion of pipeline this summer, the lake is no longer needed for that use. Residents had complained about the possibility of stagnation if the lake were drained.

At present the lake is refilled twice a month.

Reaction was mixed from the North Tustin community on the delay with John Goetten, FCA president, and Dr. Ed Longworth, president of the Save The Lakes Committee, supporting, and Dick Holden, Ted Smith and Jerry Duffy skeptical.

Smith said, "Where do we go from here to get a park?" He added, "I think unless you all expect to see Orange County become like Los Angeles something needs to be done to take action to correct some of this crowding and enable people who live in the area and love the area to identify with it."

Duffy said, "I feel what we are doing is stalling." He noted that at the Harbors, Beaches and Parks Commission hearing last month, Proposition 13 was held over resident's heads in reference to the \$5 to 7.5 million acquisition cost of the park.

(Continued on Page 2)

Canning, Kevin

From: Serge Tomassian <stomassian@ttilaw.com>
Sent: Tuesday, June 7, 2022 6:39 PM
To: Canning, Kevin
Cc: Mona Tomassian (monalisat@cox.net); Paris Tomassian; tomassian9@gmail.com
Subject: Subject: Opposition to the Re-zoning and Condo development for Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning:

Our family's home is located at 11771 Highview Drive which is located very near the THRC and requires our driving along the narrow two lane road of Simon Ranch Rd as it reaches Valhalla and then leads to our home. THRC is located very close to the intersection of Simon Ranch Rd. and Valhalla. A blind spot in the road actually exists at that very location and an accident occurred just this past weekend at that intersection. This could have been a very serious incident but for the car driving on Simon Ranch which plunged down the home's slope fortunately just missed the house and no one was in the yard at the time. This area is a serious accident waiting to happen if careful and responsible planning is not undertaken.

As with many other neighbors and concerned citizens in this older and established neighborhood we strongly oppose the re-zoning of our community's sole recreation center the Tustin Hills Racquet Club. The reasons have been covered repeatedly and I will simply provide a bullet list of the primary concerns:

- The old community's road system was never designed for the additional traffic emanating from the inclusion of 37 units-34 town homes and 3 SFR in an area designed and zoned for an Open Area for recreation and large space use. Add 2 or 3 cars for each unit. 68 to 102 additional cars, AM leaving out PM returning in, weekends all time of the day constant traffic, visitors, guests, the traffic figure grows tremendously and so do the risks and dangers.
- Increased traffic and congestion to our neighborhood on our very narrow limited roadways would create serious risk and danger to our children, pedestrians, pets.. who regularly walk and ride their bikes in this area on particular Simon Ranch Road.
- Fire danger and road outlets- one narrow two lane road in and out, that's it. Simon Ranch Road, is the bottleneck. No way around it, such increase in risk and danger to our community in order to allow an outside developer to

come in and attempt to profit from his greed, is bluntly speaking Blood Money. We can't risk our families, homes everything we have so a builder can come in and exploit our community and then take his money and enjoy it in his own private and secluded community.

- We bought these homes, paid good money for the expectation and use of large size lots which are consistent with the zoning and planning for this community. An outside builder shouldn't be allowed to come in and attempt to change the zoning to accommodate his greed for increased profit. High density condominiums in our neighborhood is like asking to build a liquor store next to an elementary school, yes there will be lots of profit-maybe, but is it right to change the design, zoning and safety of an older neighborhood so someone can greedily profit at the expense of the local residents? Both the increased traffic and the liquor store analogy would not only change the neighborhood, increase risks and dangers to the residents but also decrease values and lower the safety and enjoyment of their community.
- THRC is the sole recreational center in our whole community of Red Hill Ridge. Yes, we are an older and established community, hence, we were not designed for high density townhomes. Eliminating the Tennis Club, along with the pool, courts and other sports/fitness activities now available, will render our community with no recreational facilities-none. We don't have parks and centers as other surrounding communities enjoy.
- We bought our home with a binding covenant that the Tennis Club would remain as zoned. We think that promise should be honored without the need for court intervention.
- We live in an older established neighborhood which was never designed, planned or zoned for high density residential housing.

We respectfully request that this ill-conceived, ill planned and money driven project by a single small builder be denied and that our sole recreational facility remain for our and all future families in this community. That our small community remain safe and accessible and not be sacrificed for someone's greed.

Serge & Mona Tomassian
Paris Tomassian, daughter
Blaise Tomassian, son

SERGE TOMASSIAN | MANAGING PARTNER
TOMASSIAN, THROCKMORTON, INOUE & GRIGORIAN LLP
2601 MAIN STREET, SUITE 620
IRVINE, CALIFORNIA 92614

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Tustin Estates Maintenance aka Treviso

C/O Lordon Management Company

06/10/2022

Tustin Estates

To Whom it May Concern:

This letter is written on behalf of the Board of Directors, as well as the entire Treviso community.

It was brought to our attention that the proposed Ranch Hills Community project contains houses up to two stories that would back up to the Treviso Homeowners Association. When Treviso was built, the county required all homes to be single-story to back up to North Tustin. Because the proposed community would allow two-story homes, this would directly and severely interfere with the private views of these homes in Treviso.

Due to the inconsistencies in home requirements, Treviso feels as though the County of Orange should respect the original restrictions for home development, and not allow these incompatible homes to be constructed.

Thank you in advance and if you should have any questions, please feel free to contact me at (714) 505-1444 x 1002 or at mellody@mylordon.com.

Sincerely,

Melody Valencia
Community Association Manager
At the Direction of
Tustin Estates Maintenance aka Treviso

Southern California's leading property management firm. Large enough to serve, small enough to care.

Corporate Office
1275 Center Court Dr.
Covina, CA 91724
(626) 967-7921

Orange County
17852 E. 17th St., Ste. 212
Tustin, CA 92780
(714) 505-1444

Ventura County/Los Angeles County
325 E. Hillcrest Dr., Ste. 125
Thousand Oaks, CA 91360
(818) 707-0200

Ventura County/Santa Barbara County
300 E. Esplanade Dr., Ste. 500
Oxnard, CA 93036
(805) 751-4142

Canning, Kevin

From: vandevort1@aol.com
Sent: Saturday, June 11, 2022 12:56 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Draft Environmental Impact Report for the Tustin Hill Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I have been a home owner in North Tustin, just off of Skyline Drive, since 2003 and prior to that at another home that I purchased in 1978. So I think I would qualify as a long term resident of the north Tustin area.

There is a reason for this and I am certain that most of the people in the area are living here for similar reasons that is, mainly the large lots, the beautiful single family homes and rural nature of the community.

Allowing the construction of any townhomes, especially 37, would spoil the the continuity of the community. Not only would there a massive increase in traffic, adding to the already existing traffic, especially at rush hour, there would be fire and safety issues. Additionally, during the construction period, issues such as construction traffic, noise, dust and construction vehicles, i.e. cement mixers, clogging an already busy area.

Mr. Canning, I urge you not to allow this project to be approved.

Regards,

Alan Van De Vort
Concerned Home Owner

Canning, Kevin

From: Eleni Dalis <kngsmama@me.com>
Sent: Saturday, June 11, 2022 4:41 PM
To: Canning, Kevin; kirkwatilo@gmail.com
Subject: Save our neighborhood

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Mr. Canning,

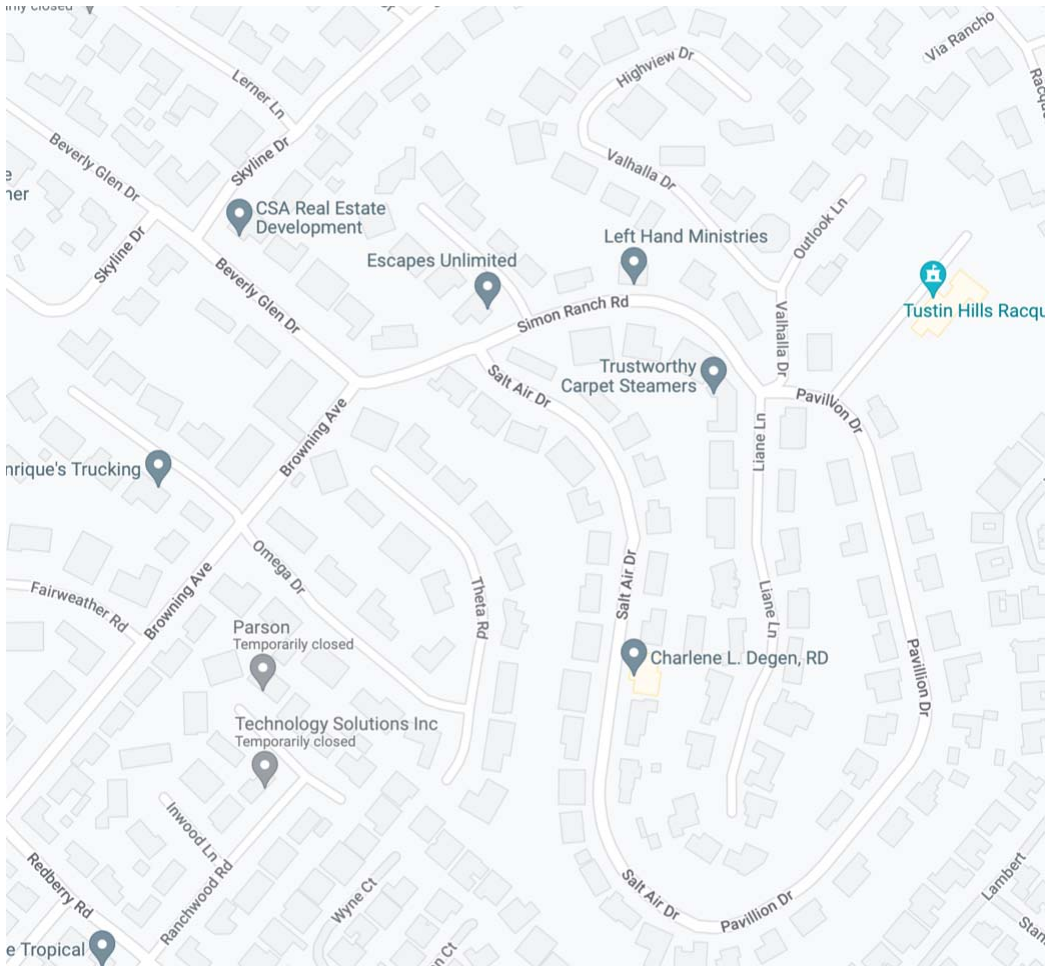
I live less than a mile from the Tustin Racquet Club and am very concerned on how it's going to impact me and my family. We live right off of South East Skyline which is one of the only two streets that go to the club, if there are 37 condos and two drivers in each that's 74 more cars on the two street. My guess there will be more than just two drivers in each condo. We always walk our dog on SE Skyline and we're very nervous that with all the added cars-traffic and no sidewalks or traffic lights, it will become very dangerous.

I have no issues with the club property being developed, but we live on 22,000 sq' and so do all of our neighbors, if not larger lots. They too need to utilized the space appropriately to the area. If we use the same logic of two drivers per home that's 10 cars not 74.

Please keep our neighborhood safe,

Thank you,

Eleni Dalis



Canning, Kevin

From: Lynne Mast <lynnemast2@gmail.com>
Sent: Saturday, June 11, 2022 12:20 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Save the Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

I am opposed to changing the zoning for the Racquet Club from a recreation area. I have lived here for over 20 years and spent numerous ours with my family and friends at this club. It is a very important part of our community. I walk by it almost daily and get to witness all the adults and children outdoors enjoying the facilities. I also am very concerned with the impact of the traffic that will increase as well as the effect that the change will have on my property valves. Also, I lost a home in Santa Ana in a fire and am concerned that many more cars trying to escape on one road is problematic Greed should not dictate zoning.

Lynne Mast

Canning, Kevin

From: Susan Holden <holdenotto88@yahoo.com>
Sent: Sunday, June 12, 2022 9:22 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Web Inquiry: PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Attention Kevin Canning:

I am writing this out of complete frustration and disgust because this project is even being considered. It is obviously a case of greed over good and the fact that we have to even argue or spend valuable time and money on it is mind blowing.

Even before research has been done on this (I am sure all the cons have already been sent before this) and legal points have been made there are so many obvious problems with this proposal it's just ridiculous.

- 1) This area is not and was never zoned for condos and apartments. It's a small hillside community with larger home lots.
- 2) The access to the area is very limited. Look at it on a map and travel up Simon Ranch Road. It is obvious that it would be extremely unsafe to have 24/7 traffic going to and from a large development as well as a fire hazard. Current traffic to and from this area is limited to day activities and club activity during its hours which is COMPLETELY different then having many permanent residents. It has no sidewalks and one way in and out.
- 3) It's a recreational space in a neighborhood that requires a green space or break between housing. It was designed to be a recreational space from the very beginning. At the VERY LEAST it should be left to be developed within the current zoning for similar sized properties. A condo development does Not make sense in this spot.
- 4) This community is a very special community, my husband has lived in this area since he was a child. It's a place people live and come back to. It was not intended to be a high density neighborhood. Just because someone wants to make a buck with it is not a good enough reason to ruin a great family environment. Plenty of places in Irvine etc that are set up for this, it's simply not the right place for a development like that.

Sorry for the "tone" of this email but I do not want politicians and greedy developers deciding the fate of my neighborhood. I am unhappy that it's even reached this stage without someone calling it out for what it is: unsafe, disrespectful and a money grab with seriously adverse consequences.

Thank you for listening. Please add this letter to the many other unhappy North Tustin neighbors who are fighting this lame development proposal.

Susan and Greg Holden
1971 Lerner Lane
Santa Ana, CA 92705

Canning, Kevin

From: Irene Dardashti <ijdardashti@yahoo.com>
Sent: Tuesday, June 14, 2022 11:09 AM
To: Canning, Kevin
Subject: Tustin Ranch Racquet Club Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

To Kevin Canning-

We are North Tustin residents and oppose the housing development plans by the new owners of what was the Tustin Ranch Racquet Club.

Please let the present open, recreational use of that property remain untouched. The plans for compact, multi family units are destructive to what currently provides fun, healthy relief from urban stresses. If developed, that property does the total opposite with: major increases in air pollution from traffic; multiple vehicle dangers on quiet streets with school age pedestrians; water supply stresses at a time of dire drought; stresses on fire and County sheriff coverage and more.

Please do not permit the conversion of Club property to the proposed multi units design.

John and Irene Dardashti
1871 La Colina Drive
Santa Ana (North Tustin), CA
92705-3371

Sent from my iPhone

Canning, Kevin

From: Jennifer de Mahy <jdemahy@yahoo.com>
Sent: Tuesday, June 14, 2022 3:55 PM
To: Canning, Kevin; KirkWatilo@gmail.com

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to **ANY** zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I have lived in North Tustin since 2000 where we have raised our kids and have come to enjoy THRC many times over the years. Our family loves THRC and enjoys all the recreational open space benefits that it offers both to its members and the local community. Losing the THRC would eliminate an integral open-air community recreation area, which is sparse in the North Tustin community which the Draft EIR fails to consider. The THRC is the only open space recreational facility in the area that provides for a myriad of recreational uses which increases the overall physical and mental wellbeing of the community. The proposed development will eliminate this important recreational center, which includes uses such as tennis, pickle ball, swimming, lawn activities, exercise gym, and banquet facilities for events. Although the club is private, it is still accessible with different types of tennis memberships, summer pool memberships, kids’ camps, swimming lessons, and social events which do not require membership. Moreover, membership at the club is open to any member of the public who would like to join. Re-zoning the THRC parcel would add an additional burden to the sparse remaining open-air recreational locations in the Tustin community (none of which come close to what the THRC offers), which will detrimentally impact our community!!

The developer, Ranch Hills Partners, & principals are not citizens of North Tustin and do not have a vested interest in our community except to make a profit. The developer’s project of high-density housing of 37 condominium units on small 5,000 sq. ft. lots is inconsistent with the contiguous surrounding residential houses, which consist of half-acre lots (minimum). The Draft EIR’s new traffic count methodology is questionable and significantly understates the proposed traffic impact as the study describes the entire project as “single-family” (Section 1.3). The proposed project primarily exists of “multi-family” units with four times the density of the surrounding community. Many of our streets are narrow, and curvy, with no sidewalks, and very few streetlights that would not accommodate increased commuter traffic. Also, the feeder streets (La Colina, Browning, Ranchwood, SE Skyline, Red Hill, Beverly Glen) into the THRC “development” would be burdened by increased *commuter* traffic. The increase in commuter traffic past the Tustin Memorial Academy grade school on Browning would be a severe safety hazard!

Additionally, the development will impact emergency management including Orange County Sheriff and Orange County Fire. It will eliminate an area that can be utilized by first responders as a staging area and/or relief center in the time of emergency. It will also increase congestion when evacuation of the area is necessary, such as was required during the wildfires a few years ago that reached Peter’s Canyon. The entry point to the THRC is narrow with no sidewalks and the proposed development does not provide secondary access. Community members, particularly in the Simon Ranch Road area, would potentially be trapped should a fire threaten that area as the pedestrian access currently in place from THRC to Racquet Hill would be closed based upon the development plans.

The Draft EIR is relying on a very broad interpretation of the Orange County General Plan land-use designation in permitting 0.5 homes per acre up to 18 homes per acre to support a high density via SB330. The California Environmental Quality Act requires that a General Plan consistency analysis be performed, which is not in the Draft EIR. The report ignores compatibility issues with the North Tustin’s land use planning that provides for low and high-density housing while ensuring land-use compatibility within the community, specifically preserving the rural land use distinctive to the THRC area. Again, the proposed development is FOUR times the density of the surrounding community. The North Tustin community has experienced well-planned development over the years by limited commercial and dense residential housing which should be protected from developers looking to make a profit while destroying our community!

Comment Letter 17 (Page 2/2)

I strongly disagree that the impact of the development on wildlife would be “less than significant” as stated in the Draft EIR. Although the THRC property is currently “developed,” it was built over 60 years ago and has remained substantially the same ever since. THRC provides a habitat for wildlife, including coyotes, hawks, owls, bats, and even wild parrots which nest in their trees and use the THRC as hunting grounds and as a wildlife corridor. Just as THRC and its adjacent walking path are used by people, it is also used by wildlife to access the surrounding areas. This access and habitats will be eliminated by the new development resulting in a *significant* impact on local wildlife.

I strongly oppose the proposed development of the THRC. Re-zoning and removal of the THRC into high-density housing would change the face of North Tustin. North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. Re-zoning and redevelopment of the THRC will increase commuter traffic perpetuating safety issues. The high-density plan would clog life-saving evacuation routes and strain local emergency services. Re-zoning and redevelopment of the THRC will destroy a valuable community asset that provides open space recreation and require community members to drive outside of North Tustin for the services currently provided by the THRC. Re-zoning and redevelopment of the THRC will push out the wildlife in this area. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost.

Respectfully submitted,

Jennifer de Mahy
North Tustin Community

Canning, Kevin

From: kelly.williams@cox.net
Sent: Tuesday, June 14, 2022 3:34 PM
To: Canning, Kevin
Cc: 'Kirk Watilo'
Subject: Response to the Draft EIR for the PA180034 / VTTM 18119 - RANCH HILLS PLANNED DEVELOPMENT

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Dear Mr. Canning,

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My family and I have lived on Racquet Hill since 2004 and our home is across from the access walkway to THRC. We purchased our home on Racquet Hill because of the large lot size and proximity to the recreational open space that the THRC provides. Our family is a member of the THRC and enjoys all the recreational open space benefits that it offers both to its members and the local community. My husband plays in the tennis league several times a week. Losing the THRC would eliminate an integral open air community recreation area, which is sparse in the North Tustin community of which the Draft EIR fails to consider. The THRC is the only open space recreational facility in the area that provides for a myriad of recreational uses which increases the overall physical and mental wellbeing of the community. The proposed development will eliminate this important recreational center, which includes uses such as tennis, pickle ball, swimming, lawn activities, exercise gym and banquet facilities for events. Although the club is private, it is still accessible with different types of tennis memberships, summer pool memberships, kids’ camps, swimming lessons and social events which do not require membership. Moreover, membership at the club is open to any member of the public who would like to join. Re-zoning the THRC parcel would add additional burden to the sparse remaining open air recreational locations in the Tustin community (none of which come close to what the THRC offers), which will detrimentally impact our community!!

The developer, Ranch Hills Partners, & principals are not citizens of North Tustin and do not have a vested interest in our community except to make a profit. The developer’s project of high-density housing of 37 condominium units on small 5,000 sq. ft. lots is inconsistent with the contiguous surrounding residential houses, which consist of half acre lots (minimum). The Draft EIR’s new traffic count methodology is questionable and significantly understates the proposed traffic impact as the study describes the entire project as “single family” (Section 1.3). The proposed project primarily exists of “multi-family” units with four times the density of the surrounding community. Many of our streets are narrow, curvy, with no sidewalks, and very few streetlights that would not accommodate increased commuter traffic. Also, the feeder streets (La Colina, Browning, Ranchwood, SE Skyline, Red Hill, Beverly Glen) into the THRC “development” would be burdened by increased *commuter* traffic. The increase in commuter traffic past the Tustin Memorial Academy grade school on Browning would be a severe safety hazard!

Additionally, the development will impact emergency management including Orange County Sheriff and Orange County Fire. It will eliminate an area that can be utilized by first responders as a staging area and/or relief center in time of emergency. It will also increase congestion when evacuation of the area is necessary, such as was required during the wildfires a few years ago that reached Peter’s Canyon. The entry point to the THRC is narrow with no sidewalks and the proposed development does not provide a secondary access. Community members, particularly in the Simon Ranch Road area, would potentially be trapped should a fire threaten that area as the pedestrian access currently in place from THRC to Racquet Hill would be closed based upon the development plans.

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I strongly disagree that the impact of the development to wildlife would be "less than significant" as stated in the Draft EIR. Although the THRC property is currently "developed," it was built over 60 years ago and has remained substantially the same ever since. THRC provides a habitat for wildlife, including coyotes, hawks, owls, bats and even wild parrots which nest in its trees and use the THRC as hunting grounds and as a wildlife corridor. Just as THRC and its adjacent walking path is used by people, it is also used by wildlife to access the surrounding areas. This access and habitats will be eliminated by the new development resulting in a *significant* impact on local wildlife.

I strongly oppose the proposed development to the THRC. Re-zoning and removal of the THRC into high-density housing would change the face of North Tustin. North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. Re-zoning and redevelopment of the THRC will increase commuter traffic perpetuating safety issues. The high-density plan would clog life-saving evacuation routes and strain local emergency services. Re-zoning and redevelopment of the THRC will destroy a valuable community asset that provides open space recreation and requiring community members to drive outside of North Tustin for the services currently provided by the THRC. Re-zoning and redevelopment of the THRC will push out the wildlife in this area. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost.

Respectfully submitted,

Kelly Williams
2211 Racquet Hill
North Tustin

June 14, 2022

Response to the County of Orange Draft Environmental Impact Report for Ranch Hills Planned Development Planning Application NO. PA 18-0034 County EIR 635 SCH No. 2021060400

Dear Kevin:

You and I go back a long way to the Aliso Viejo and Leisure World days. I have always found you a reasonable and pragmatic person. Now where I reside is being challenged with an unreasonable project on my street and you and the County staff supporting it. There are other options that need to be explored.

The following comments are made challenging various sections of the Draft EIR.

Page 23 1.4 County staff writes the Project Objective is to increase housing units in the North Tustin Community.

Response: The North Tustin Community has been built over the years to limit commercial and dense residential areas that County and surrounding cities have agreed with, creating a very desirable and well-planned community which is unique in Orange County and should remain as such without the threat from outside developers looking to make a profit and destroy the existing community feel.

OBJ-1 County staff writes North Tustin Residents will reside in the proposed development when they sell their existing home with the inference, they will continue to be close to neighbors and friends.

Response: Kindly provide all surveys and written documentation that supports this statement. Over the past few years, a small percentage of prior owners who have sold have done so to get closer to where their children live for their ongoing support or have moved to congregate care facilities. We know this because they were our neighbors and we have had one on one conversations and farewell parties with these prior residents. Did County Staff survey these prior owners? The County's statement has no basis of fact. Estimating the land purchase price and the cost of development today, FCA anticipates these properties would be valued at well over a million dollars and residents desiring to downsize and save money for their long-term retirement are not likely to spend 50-75% of their sales price only to buy a home in the neighborhood and for many, to lose their Prop 13 property tax benefit.

OBJ-2 County Staff write the redevelopment will implement current codes that require such items as water efficiency.

Response: California is in a severe drought and the Amber Alert signs on the freeway during the Memorial Day weekend confirmed that fact. Although the State government has passed laws encouraging development and bypassing

local government review, the Governor has signed an emergency order to save water. Adding additional development to the housing stock will not help with restricting water use. The City of Tustin has just restricted water use even more in the last week and has increased rates in the past year to “encourage” conservation. Those of us in the North Tustin area with larger lots are paying heavily for the cost of water. Please confirm with the City of Tustin they will provide service and that the adjoining neighborhood properties will not be subsidizing these new properties with additional pass through costs and additional restrictions.

OBJ-3 County Staff write that the proposed development will reduce traffic trips.

Response: I dispute the claim in that no actual traffic study was done when the Mitigated Negative Declaration was created, and assumptions were made about the current traffic counts based upon incorrect assumptions of how many events are held at the Club throughout the year. FCA requests that the County provide detailed reports for the past five years of the number of events at the club have been held with participant numbers so FCA and County staff can come to an agreement on what the true current numbers are versus a proposed development might generate.

Pages 25-26 Alternatives to the Project

1.71 No Project Alternative County Staff write that the existing use would be economically, logistically and politically feasible, but it would not meet the “Project Objectives”

Response: As stated before the “Project Alternatives” were created by a profit-making venture from outside the neighborhood who does not care what is best for the North Tustin area. The proposed alternative will be economically feasible if priced right, is not logistically feasible for the existing residents who will have to deal with an in-fill development and ensuing construction traffic and noise, and it definitely is NOT politically feasible. Kindly review replies to the Mitigated Negative Declaration (hereafter referenced as the MND) and advise the General Public who supports this project. I recall the developer, the County and one person from Orange that has a conflict of interest. he City of Tustin is opposed, FCA is opposed, NTAC is opposed, the County Supervisor for the area is opposed and 98% of the tract where this proposed development lies have signed a petition in opposition to the development.

1.72 Alternative 1 Increased Setback Alternative

Response: Since greater setbacks are viable, why hasn't the County and the proponent incorporated this in their initial designs?

Page 35 Table 1-1 Section 4.11 Noise The report references the City of Tustin Noise Control regulations and references County conditions of approval

Response: The proposed project is adjacent to the City of Tustin but not regulated by the City of Tustin. This report should reflect the County's standards. Regarding the County's conditions of approval, #3 says stockpiling or vehicle staging areas shall be located as far as practicable from residential dwellings. This proposed area is surrounded by resident homes, so it is wishful thinking to allow a neighboring property owner to rely on this statement as the construction will require the furthest distance from residential properties to be graded in the initial phases of development and therefore no stockpiling in this location is likely to occur.

Page 37 Section 4.15 Transportation c) The plans show a gated entrance at a narrow two-lane existing roadway into the clubhouse parking lot. The County's statement is that the County Manager must sign off and approve the plan to prevent a dangerous intersection.

Response: Kindly provide specific details of the entrance design proper to consideration of approval by the County to ensure the entrance and exit will NOT be a dangerous intersection and that all County regulations regarding stacking distances for vehicles entering the proposed development will be met. In addition, kindly obtain a copy of the governing documents of the proposed Homeowners Association requiring two cars be parked in the garages and that quarterly garage inspections will be instituted by the Association. Finally, require that there be no parking of the development's vehicles on County roadways outside the development.

Section 4.18 Wildfire a) The County relies on a statement elsewhere in the draft EIR that it has not adopted an emergency evacuation plan for this area and therefore the development does not impact an emergency evacuation plan.

Response: I am concerned about the fact that the entire community development was taken as a whole when developed years ago and the County as lead agency has records to reflect how and why the existing number of homes were developed and why the existing 5.88 acres was zoned agricultural, and absent that documentation, it is completely inappropriate to allow additional residential structures on the property, endangering the proposed new residents and as important, the existing neighborhood in Tract 3883. There is one way in and one way out to over 115 existing homes. The current site gives people a place to quickly get to an open space in the event of a fire.

Page 45 2.0 Introduction 2.1 Summary 2.2.1 Environmental Procedures

The County staff writes CEQA guidelines requires a public agency to "balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian.

Response: Since CEQA guidelines are very clear about the objectives of an EIR, and with the proposed development area being the only zoned open space recreational facility currently serving hundreds of families on a regular basis meeting their vision of providing a decent home and satisfying living environment for every Californian, especially those whose lives have benefited from this recreational gem, it is unconscionable for the County of Orange to make a determination that a residential development is the highest and best use for this property after considering all comments made so far and to meet the objectives of CEQA (rather than the developer's own profit making objectives that have been written in 3 bullet points which are factually false and misleading).

Page 64 3.5 Project Theme Vehicular Access, Parking and On-Site Circulation

Response: As stated previously, require the HOA to do quarterly garage inspections as well as prohibit any vehicles in the HOA to park on exterior streets.

Page 67 Zoning. The County staff write the zoning is A1 (general Agriculture) which allows a maximum residential density of 0.25 dwelling units per acre with a minimum lot size of 4 acres. The General Plan designation is 1B Suburban Residential.

Response: Although the County has opined the inconsistency in zoning allows the developer to not request a zone change, FCA challenges this position. There are two use permits required and the entire community opposes providing either use permit for this project and the County is not required to provide them. The City of Tustin agreed to certain changes to the Tustin Ranch development (single family homes adjacent to the Club) in exchange for a similar consideration and now a retaining wall which will elevate the project home with direct view into the rear yards of their Tustin neighbors is not fair.

Page 67 Use Permit- The County writes that a use permit will enable a public review of the detailed plans by holding a hearing conducted by the Zoning Administrator or Planning Commission.

Response: Elsewhere in the Draft EIR, the County has stated that they cannot prevent this project from moving forward. As the County states in their description of why a hearing on a use permit is conducted, such as the project having a relatively moderate to high potential for adverse impacts on the site or surrounding community, they have written that there is no significant impact by having the project proceed. Kindly let the general public, adjoining city and other public agencies speak at a public hearing as to the reason why 99% of the respondents are opposed to this project.

Page 211 4.10.4 Impact Analysis County of Orange Code of Ordinances b) and applicability of Previously Recorded Restricted Covenants on the Project (Page 212). The section quotes the Regional Housing Needs Assessment and the County's need to

accommodate an additional 10,406 housing units by 2029. It also references the County General Plan. It also cites the County of Orange 2021a regarding housing types ranging from rural, large-lot estates in outlying areas (which is what this North Tustin Community is on three sides of the existing 5.88 acres) to high density residential units in appropriate urban locales and are encouraged to be built there.

Response: The County has pointed out that this property is zoned A1 General Agricultural District with a minimum of 4 acres per building site and allows no more than one single-family residence per building site, and FCA has commented previously that it is surrounded by homes on a minimum of ½ acre lots. Two other factors must be acknowledged by the County of Orange writers of this draft EIR. The developer of the Racquet Club negotiated a covenant running with the land in exchange for their support of the racquet club development (and FCA believes the County relied on that covenant when they approved Tract 3883 and the Club for ingress and egress and Fire/Life/Safety as a complete development). Although the County has stated they will not be involved in enforcement of the private covenant, FCA stands prepared to enjoin the County in any future claims, appeals and litigation should this project be approved by the County if they ignore the Covenant. The second issue is that the City of Tustin previously had agreed to limit the height of homes adjacent to North Tustin when their developments were submitted for consideration, out of consideration for the residents in North Tustin and concern about potential area resident litigation. The City provided a response to the MND requesting the same consideration that the proposed developer and the County have ignored. FCA objects to the concept of breaking a reciprocal agreement with an adjacent municipality. All of these factors should be considered before the County considers approval of this project.

4.13.3 Thresholds of significance (iv) parks. The County staff state there would be no impact on parks because the development has open space areas, a pool area with a pool, jacuzzi, deck and pool building and that these on-site recreational amenities would serve the future residents demand for recreational facilities.

Response: The recreational facilities in the private, gated community will be insufficient to meet the needs of the proposed number of residents residing in the community, and the neighborhood outside the gate will not be permitted to use the facilities! I spent 42 years in the Homeowners Association business and for the developer and County to argue this small common area will be sufficient, you are all mistaken. The way it is written, it seems as though the author is saying this element will be for the owners in the development but for the general public as well. WRONG!

The County is completely ignoring the fact that the Racquet Club Is a recreational facility for the North Tustin area and beyond. Eliminating this facility will severely impact the community parks, in that the following groups will have to migrate and

to other locations to continue their recreational activities which include tennis, swimming, physical fitness, personal training classes and now pickleball. Club employees and members estimate that 80-90% of the Club's clinic tennis players are nonmembers. Approximately 100 of these tennis players are continuous throughout the year with approximately 500 new players every summer. These new players feed into local high schools. These people will not have their regular LOCAL place to play any longer and will have to seek other locations to play. That will impact the local area with potential longer commutes, more ozone depletion, poor air quality and many more environmental the County is ignoring. It will also impact local tennis and pickleball facilities such as Tustin Sports Park, Currie Middle School (TUSD) and Tustin Legacy Sports Park.

Page 252 4.15 Transportation. The County Staff state that Psomas conducted a traffic count one day on April 15, 2021 when only the tennis courts were open at the club. A total of 349 daily trips were counted. From that one study, coupled with estimates of traffic trips compiled from trip generation rates of 277 daily trips from the Institute of Transportation Engineers, the result stated that the traffic generated by the Club is more than what a 37-home community would generate.

Response: Please provide a report of the April 15, 2021 count to determine the traffic pattern for that intersection and if that included through traffic from Pavillion to Simon Ranch. The study was done over a 24-hour period and the Club is closed for 8 hours of that time. Did the 349 traffic trips go into the Club during the remaining hours? It is unclear in this EIR. FCA questions the trip generation estimates provided by the traffic consultant for the Club. As stated in the MND response, the Club did not have events every weekend which is what the traffic analysis used to create the traffic trip calculations for the Club. Therefore, the traffic trips are overstated and unreliable.

The County also admitted that the closest bus stop is 1.1 miles away and that there are no sidewalks or bike lanes and elsewhere in the draft EIR stated there were limited streetlights. They did say there was a pedestrian walkway that was not a dedicated easement and if the residential housing facility were to be built, residents on the north side of the club could simply walk to the club on a two-way road with no sidewalks for a very long distance. It would be very unsafe to do so as vehicles come speeding down Skyline due to its slope and configuration.

The project developer stated in the MND that this property was going to be marketed to senior citizens. After hours of questioning to the developer about this illogical statement during the NTAC meeting and when the community pointed out everything that the County did in the aforementioned paragraph, the developer stated that older residents in the area would want to buy these homes since there was a master bedroom on the ground floor. As stated previously, for the past few years, long time aging residents in the North Tustin area have moved closer to family or into the congregate care facilities that have been built along

Bryan and Newport Boulevard for that specific reason. They are close to transportation stops and medical facilities. The Racquet Club location has no services for seniors.

Page 268 4.17 Utilities and Service Systems 4.17.1 Water (page 273)

The draft EIR states that a will serve letter was received by the project applicant from the City of Tustin Water Department in September 2021. In addition, in Appendix B page 29 a letter was sent to the County Planner regarding the design in response to the MND.

Response: On July 19, 2021 the City of Tustin wrote the County Planner a letter which contained the a statement in opposition to the project's design. Although the City of Tustin Water Department sent the project applicant a will serve letter, it is FCA's opinion that the City of Tustin Council may direct their Water Department to cancel their will serve letter based upon the following from their Community Development Director and that the County should revisit this with the City of Tustin at the earliest possible time. No water service effectively cancels the project and the County should be aware of this potential action.

The City of Tustin wrote "It is our understanding that the proposed Ranch Hills Community includes attached residences that are up to two stories in height and have a minimum net lot area per residence of 5,000 square feet. This height, development pattern, and density are inconsistent with the height, development pattern and density of the adjacent Treviso properties. The proposed project would be an incompatible land use along the border between North Tustin and Tustin Ranch and would be in conflict with the restrictive requirements that were agreed to when the East Tustin Specific Plan was adopted and that were imposed upon the developer of the Treviso neighborhood. The County of Orange should respect this land use restriction and reciprocate by not allowing incompatible residential development directly adjacent to the Treviso neighborhood and by also limiting the heights of the proposed buildings within the Ranch Hills Community along the City/County border to a maximum of one story." Justina Willkom, Community Development Director.

Thank you for the opportunity to provide comments to you, County Administration, Psomas and Applicant.

Sincerely,

Kirk Watilo
2331 Pavillion Drive
North Tustin

Canning, Kevin

From: Dan & Nancy Chapel <chapel@cardwellhillwine.com>
Sent: Tuesday, June 14, 2022 3:09 PM
To: Canning, Kevin
Cc: Jon Sullivan
Subject: Comments on the EIR for the proposed Ranch Hill Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

To: Kevin Canning,

Here are my comments with reference to the proposed development known as the Ranch Hill Planned Development:

Comments in Response to the **EIR published by the Orange County Development Services**

June 14, 2022

With reference to Project Objectives I would like to comment on **Objective 1.4**. It beggars the imagination to conceive of how a housing project with 37 units where residents live on a full- time basis and have significant support services can reduce the traffic level from that of a tennis and pickle ball club with a limited membership where people come irregularly in one vehicle and then leave in that same vehicle. The facility closes at 10:00pm and opens at 7:00am. During this time when the club is closed, there is no traffic to and fro.

Nowhere can I determine who is responsible for the cost of tie-in services to outside of the battery limits of this project for the utilities required by this development. Does this expense raise taxes of those living in the community?

With reference to **Section 4.6 c** here is unfortunately no consideration given in your document that addresses the significant impact on the North Tustin community of loss of Open Space . The Tustin Hills Tennis and Pickle Ball Club includes mature trees, grass, flowers and other landscaping elements that store carbon, maximize rain water absorption and minimize water run off.

Open space is recognized as both helpful to the environment and necessary to the quality of life of a community. Lack of access to safe, open space is a critical area of concern to the residents of North Tustin . Plus more concrete does not facilitate adequate and acceptable water absorption.

Section 4.13 Public Services, Fire....Fire and Rescue vehicles: I am concerned that large fire vehicles would not have adequate access to this area due to the very tight clearances especially on corners as outlined on the VTTM 18119 preliminary grading plan & cross-sections. Is there adequate space for large fire trucks to turn around?

Thank you for this opportunity to comment upon the EIR.

Nancy E. Chapel
2181 Racquet Hill
Santa Ana, CA 92705

June 14, 2022

Kevin Canning

Re: Concerned resident of North Tustin and Member of THRC

Dear Sir

After reading the Draft Environmental Impact Report, I want to respond in opposition to a high-density housing development proposed at the site of THRC.

For many years, THRC has been the main recreational and social outlet for myself and my family. We have used the swimming pool, gym, played tennis, and attended events. There is no public pool in Tustin and we would have to travel some distance to Irvine to play tennis or swim with others. THRC has been a valuable community asset and its replacement will only benefit the developer while severely impacting my family.

Regarding the EIR I want to point out the following:

- * The daily traffic counts in EIR are ridiculously high and unreliable for THRC currently. Banquets or weddings are infrequent. The THRC parking lot is rarely more than 20% full. A high-density housing development would definitely increase the traffic count on Simon Ranch Road and Browning, both streets with homes on each side of the narrow streets that have no sidewalks and lighting. Browning is our only convenient egress from our home and the added traffic would impose traffic disruption and danger to walkers.
- * Simon Ranch Road represents the only access point out of our community should an earthquake or fire occur and would be overrun with traffic during an emergency if there were 38 residences built at the site of the THRC.
- * THRC is the the last remaining parcel in North Tustin zoned for recreation.
- * A recorded land-use covenant was executed by the previous owner of THRC in perpetuity for the benefits of residents and therefore the use of the property belongs to the residents, not the THRC owner.

Patricia Gaffney
11582 Ranch Hill
North Tustin, CA 92705

Canning, Kevin

From: Amy Opfell <aopfell@gmail.com>
Sent: Wednesday, June 15, 2022 8:28 AM
To: Canning, Kevin
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

To Whom it may concern

I am a native of Orange County and have been a member of the racquet club since I was 4 years old, I am now turning 65. I can honestly say that the competitiveness, friendships and lessons I learned at the club has formed to be the successful hard driven woman that I am today. I just retired after being an Anesthesiologist for 32 years. We need this club today more than ever, kids need to learn what I did and adults need a place for healthy recreation. We do not need dense housing in this area!

The memories I have of the club are priceless.

Amy Opfell

Canning, Kevin

From: Jeff Sutherland <jeffscottsutherland@gmail.com>
Sent: Wednesday, June 15, 2022 11:21 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Racket Club Zoning

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Kevin,

I am writing to let you know I appose any rezoning of the Racket Club areas currently under review. I grew up in Tustin and was lucky enough to spend time in my childhood enjoying the racket club and its amenities. The Racket Club serves as our community as a place for families to meet each other, exercise, socialize and for our children to learn new sports. Without the Racket Club our community would not be the same. We do not need additional housing in our area we need to preserve the space, safety and community togetherness that the Racket Club brings us all, especially in today's uncertain world.

Please do not let us lose this important place for current residents, it would be a loss to our community.

Thanks for listening,
Jeff Sutherland

Canning, Kevin

From: Matt Hudack <matthew@financialsynergistics.com>
Sent: Thursday, June 16, 2022 3:30 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com; jay.nugent@ngkf.com; mhudack@pacbell.net
Subject: Tustin Hills Raquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I have lived in Tustin since 1975. As a child growing up in Tustin I enjoyed roaming the hills and playing tennis at the Club. This club has produced many top tennis professionals from my generation but that is not the main reason I must oppose any zoning change to this area. I am opposed because for Generations people have bought homes, established roots and ties to the community based upon a certain set of factors that can and should be depended upon. It is these factors, these homes, and this club that make North Tustin a "Community of Neighbors". This club has hosted events, weddings and community gatherings of all kinds. If such a place like the Tustin Hills Raquet Club does not exist where does a community gather? Where are social events held? Where are sports banquets conducted? The proposed development is certainly a slippery slope when you consider generational impact.

The development of the club into 37 homes that will produce 170 cars coming out of the same streets multiple times a day creates a safety hazard. The tight spaces the homes are crammed into creates a fire hazard. The 30' high homes creates a view problem. The 14 foot retaining walls create a hazard and soil stability challenges for surrounding neighbors. The rezoning creates a negative valuation for the surrounding neighborhoods who relied upon the zoning when making their financial decision to buy a home in a "Tustin Style Neighborhood". Any development of the Club will be the first step in forever changing our community of neighbors into a money grab for developers. Where does this stop?

Once taken from us as a Club built for the community and then converted into a development that does not remotely match anything else in the community, we will have lost something that will never again be replaced. While we are in a drought is it the right thing to add 37 homes that will consume more natural resources than the club? There are so many issues at play rather than just money! I understand the need for governmental organizations to create larger tax bases and utility clients however, it is also your responsibility to look out for the community and do the right things for the long term success of a community. We know in today's world it is hard for many in government to do the right thing...I hope you are one who can buck the trend and see the value this club brings to the community.

Development is not always progress! Communities need places like the Tustin Hills Raquet Club for social engagement as well as continuing to grow the next generation of Neighbors.

Matthew Hudack, CLU, ChFC
President



Decades of Guidance. Generations Empowered.

matthew@financialsynergistics.com
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Direct Dial 949-329-3408
Cell 714-305-0262
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180 E. Main Street, Suite 206
Tustin, CA 92780

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June 16, 2022

Mr. Kevin Canning
Contract Planner
County of Orange Public Works

Dear Sir:

As a concerned resident of N. Tustin, specifically the neighborhood of the Tustin Hills Racquet Club, I am writing to express my objection to the proposed development of the present site of the THRC. Honestly, I never thought the project would get this far since the zoning doesn't allow for high density housing, in fact no housing at all based on the CCR's of neighboring properties, the project does not conform in any way to the surrounding single family residences, and the developer has failed on his promise to seek the input of the neighborhoods impacted by such a development.

However, my main concern is with the increase in traffic and with the dangerous conditions high density would face and cause in an emergency especially a fire emergency. We live on Browning Avenue, the main road that would feed into this development, and have since 1990. During that time we have had to evacuate our home on four separate occasions due to fires coming down the canyon, so don't tell me this isn't a "high fire Zone." Maybe technically but realistically it is. The addition of the 37 units proposed deeper into the canyon and uphill from me would further increase the danger as Browning, already a busy exit route from the hills would be further impacted as it would be the ONLY exit route for these new units.

Those of us living in the neighborhood and particularly on Simon Ranch and Browning have undergone two years of hell with the reconstruction of the "reservoir" at the intersection of Lianne Lane, Simon Ranch, and Pavillion. The rumbling of heavy trucks replaced our alarm clocks at 7:00 AM and continued till early evening, five days a week. To think that another building project of earth grading, major infrastructure, general construction is being proposed is too much. We understood that the "reservoir" was necessary for the benefit of the community. The proposed development is for the benefit only to the developer.

Over the thirty years we have lived here on Browning we have seen more and more young families return to the neighborhood they grew up in. All day long there are moms and dads pushing strollers along with youngsters with their bikes, dog walkers galore mainly because Browning is one of the few street in the hills with sidewalks, and like myself the elderly pushing a wheelchair for an ailing spouse. Traffic has increased for sure but not because of new housing such is being proposed right in our backyard. Enough is enough. We purchased here as did many of our new neighbors because of its rural neighborhood as compared with the surrounding communities of Tustin Ranch

and Irvine. We have an outstanding neighborhood school on Browning, Tustin Memorial (all the more reason to limit traffic), and we relied on the deed restrictions and CCRs on our properties to maintain this rural nature. I for one never thought that the County decision makers would try to change these restrictions never mind try to rezone one of the only recreation sites in N. Tustin. I knew every opportunistic developer would eye the site of the THRC as a development opportunity but “ KNEW” that this could not happen because of the zoning. Do not do this now.

I could go on and on with many more objections from environmental, health and safety, the characterization that this would allow “ downsizing “ for us seniors, and affordability, ridiculous at best if not misleading and false. But as I have said before “ enough is enough”.

No Zone Change. Stop this self serving project. It will add nothing to the neighborhood.

Yours truly,

Sheila Harvey
12191 Browning Avenue
Santa Ana, CA

Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
P.O. Box 4048
Santa Ana, California 92702-4048

June 17, 2022

Dear Kevin,

My house is located at 11753 Willard, Ave., Tustin, in the Treviso tract of Tustin Ranch, which backs directly up to the Racquet Club. My wife and I have lived here for the last 21 years. Previously, we lived on Salt Air in the same neighborhood as the Racquet Club for 5 years. We chose houses in these neighborhoods for the following reasons:

1. We moved here from Mission Viejo in 1996 to get away from the constant urban sprawl, which caused traffic problems, lines everywhere from an ever-expanding population, and a myriad of other daily inconveniences. We thought North Tustin/Tustin Ranch area would be a great place to live because the neighborhoods were upscale, already established and built out, and that there was little if any places in the immediate area that could be expanded. We felt moving here meant we wouldn't have the same inconveniences we suffered under South County's ever expanding urban footprint.
2. Our biggest consideration for moving to Willard Ave. is the house was a single level and it did not have another house directly behind it, it was private and quiet (even with the use of the tennis courts and occasional use of the club facility for meetings and receptions).
3. Home values in the area were stable and consistent with an upscale lower-density area and property taxes were reasonable (and have always remained stable and constant).
4. The location has an abundance of amenities – Racquet Club, Tustin Ranch Golf Course, Peters Canyon, etc.
5. Great neighborhood schools that are not overcrowded.

The proposed development at the Racquet Club, as described in the Environmental Impact Report, would directly impact my location, my neighbors, adjacent neighborhoods, and the quality of life for everyone in the immediate area:

1. This development would put a number of 2-story townhouses within 16 feet of mine and my neighbors' back fences and residents in the proposed development would have a direct view into our backyards from their 2nd stories destroying our privacy and serenity.
2. As I understand it, the development would require a sizeable retainer wall that would abut to our back fences, which could cause soil erosion, drainage problems, noise, attract rodents/animals and create a number of other unforeseen problems.
3. I believe packing 37 less expensive residences, occupied by a couple hundred people, into such a small area would severely diminish the property value of my house and houses in the immediate vicinity, and fundamentally impact our neighborhoods in many negative ways.
4. The proposed housing density is way too high for this area. All of the surrounding neighborhoods are composed of larger lots with low density. This development would create high density units with zero lot lines, little green space and a lot of traffic and noise. It will ruin the appeal of the area's rural setting for all that live around it.

Neither the developer nor the county has ever reached out to anyone in my neighborhood to talk to us about

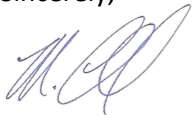
changing the zoning and building houses as a replacement for the Racquet Club. This is extremely inconsiderate and shows the developer and the county do not care what the people that have lived here for decades think about what should be developed if the Racquet Club were to be replaced.

- 1) From what I understand, the rezoning process was not followed correctly. Taking land from low density to high density requires neighborhood input that never occurred.
- 2) This is unscrupulous and sinks of developer greed. Purchasing this land and building it out to the maximum it can accommodate shows total disregard for existing residents.
- 3) Overbuilding in a less-dense area shows no consideration for those who bought in this area because of the less-crowded environment.
- 4) One of the stated purposes for the high-density development is supposedly for providing 'downsizing seniors' with housing. This is a ruse for a speculative housing play based on buying lower-cost agriculturally zoned land and rezoning it for high-density residential units because of a low supply of local housing. Acquiring cheap land and putting the most possible housing units on it is about maximizing profit, not increasing value for surrounding residents.
- 5) All of us surrounding the development will have to live through two or more years of constant construction.
- 6) If approved, we will have to live next to another 200 plus people in a very small space, which will create a lot more noise, traffic, crowding and other issues attributed to denser cheaper housing in a more upscale rural area.

I strongly oppose the development as it has been presented. Building this type of development will diminish the quality of life and home values for all of us that have lived next to and around the Racquet Clubs for decades.

I believe this development is a waste of time for county planners and other administrative officials. This project should have been shot down a long time ago and it should be rejected when it comes before the county for a vote. The local residents oppose this planned development and if necessary, will fight it for years to come.

Sincerely,



Michael Campbell
11753 Willard Ave.
Tustin, CA 92782
714/855-8100
m1campbell@hotmail.com

Canning, Kevin

From: Andy Wang <andywanger3@yahoo.com>
Sent: Monday, June 20, 2022 12:38 PM
To: Canning, Kevin
Subject: Tustin Racquet Club Rezoning

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Kevin,

I am writing you to express my deep concern about the potential re-zoning of the Tustin Racquet Club. I am a homeowner whose home is directly in front of the club. It has been a pleasant experience to have the club as part of our community. We play pickleball on the courts and expect to take tennis lessons as well. Losing the club to more homes and condos will drastically affect the ambiance that the club currently provides.

Also, the amount of traffic and congestion that would be created from a redevelopment would be unbearable. We recently had to endure two years of the well replacement on Valhalla. I can honestly tell you that it was a horrible experience. We had to deal with noise from 7AM to 5PM every day. There was a constant flow of trucks, cars, debris, dust, and everything else you can imagine in a construction zone. There were times where we were stuck on the street because we had to wait for large trucks to move. We couldn't take walks outside because of all the dust and noise. And, this was all from just the one well being built. I cannot imagine the congestion caused from building the number of houses and condos that this developer is proposing. His plans do not fit our neighborhood and it would negatively impact our property values, standard of living, and overall lives. Plus, with the current economic environment, there is the possibility of these plans being revised to smaller condos or even something entirely different. Approval of the project is a slippery slope, especially with interest rates rising and inflation already so high.

As a family who would be directly impacted by this redevelopment, I sincerely ask that this project is rejected. We do not support it, we do not welcome it, and we would be very disappointed.

Thank you.

Ranch Hills Planned Development
PLANNING APPLICATION NO. PA180034
VESTING TENTATIVE TRACT MAP NO. TT18119
INITIAL STUDY NO. PA 180034

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT.

Please be advised I am opposed to **ANY** zoning changes at the Tustin Hills Racquet Club (“THRC”) property.

What is the value of family? What is the worth of friends? What is the price of memories? What is the importance of a healthy lifestyle? What is the significance of a life well-lived in a home for over forty years? How many citizens will be negatively affected by the lack of any recreational facility in a whole area of Orange County? What is the impact of negatively changing the nature and character of a community forever?

None of these questions are answered in the Draft EIR for the Tustin Hills Racquet Club property in North Tustin. Nor can they ever be.

Our family moved to North Tustin in June 1979 from Rochester, New York. Despite paying 2.5 times what we sold our house for in New York, we were ecstatic to find a house in the recently built John Lyttle homes in Lemon Heights. That was because we could **walk** to the Tustin Hills Racquet Club! The tennis club was the **single most important** reason that we bought the house we did in Lemon Heights.

We immediately joined the club after paying \$1200 (over \$4800 today) for a membership. Forty-three years later, I am still a member. Our children, ages two and seven when we moved here, grew up at the club; first in the swimming pool and later on the tennis courts. Our son wound up playing tennis for Foothill High School. He also got his first job tending the snack bar at the club. This is significant because he went on to a career in the hospitality industry. From little acorns, big oaks grow. None of this would happen in the future if the proposed project replaces the club. Today, our five-year-old granddaughter and three-year-old grandson are learning to swim at the club. What is the value of family history like this? Stories like this will never be repeated if the proposed project replaces the club.

My wife and I played years and years of mixed doubles in summer league, winter league and just for fun with many, many other wonderful couples that became our circle of friends. My wife played for years on Tustin Hills traveling teams that played other clubs throughout Orange County. We enjoyed parties at the club, dinners with fellow

members at local restaurants, birthdays and other occasions celebrated, road trips taken. We still are friends with some after forty years. What is the worth of friends and memories such as we have because of our tennis club? Friendships like ours will never be made if the proposed project replaces the club.

As somewhat of a fitness fanatic, I would play tennis Saturday morning, lift weights in the club weight room and then run five miles in the hills. My wife and I would walk down to the club after dinner just to hit balls. We played tennis regularly at the club for over twenty five years. To this day, I walk to the club and use the weight room three days a week. Now in my mid-seventies, it has helped me recover from knee and foot surgeries, retain muscle tone and generally stay very healthy. There is no facility anywhere in North Tustin that provides the recreational and social opportunities offered by the Racquet Club and its tennis courts, pool and fitness center. What is the importance of healthy lifestyles for so many in our community provided by the availability of the Racquet Club? The EIR does not address the fact that the health and wellness of Orange County citizens will be negatively impacted if the proposed project replaces the club.

When we moved from a place where half acre lots were the norm to southern California we never thought we would find similar property. But we **did** in Lemon Heights. We have lived here now for forty-three years. We have put our heart and soul into our house and it is now our family **home**. We have diligently worked to maintain and significantly upgrade our home over the years. We did this knowing/believing that we were not only improving our lifestyle, but enhancing our property value in a neighborhood that was highly desirable. We love our home and where we live. In the early eighties, with nearly three hundred of our neighbors, we banded together to prevent Racquet Hill Drive from becoming a through street to the new Tustin Ranch development, preserving the tranquility and beauty of our neighborhood. It was, and still is, a neighborhood that is relatively unique in Orange County with all half acre lots. It is a bucolic neighborhood where the vast majority of residents have, likewise, maintained and improved their properties. The proximity to the Tustin Hills Racquet Club, its open space and recreation opportunities, remains a large part of the allure of this area. What is the significance of a healthy life well-lived in a home for over forty years?

Our life story in North Tustin is not all that unique. There are many stories like ours. What is the impact of changing the nature and character of a community forever?

The Draft EIR does not address a single one of these questions, nor can it ever. That is because it does not address the **human** elements at play with this proposal. **People** live here because they have **chosen** to live here for reasons like I have cited above. It is a

tranquil, beautiful area where **homes** are not jammed together as they are elsewhere in Orange County. It is a truly **special** place that this proposal would completely change **forever** in a wholly **negative** way. Proposed is an island of ugly, jammed-in duplexes at 6.3 dwelling units per acre amidst a sea of beautiful single family homes on spacious lots at two to an acre. Further, in doing so, the proposed project removes the **only** recreational facility in the area, negatively impacting the **health and well-being** of hundreds of Orange County Citizens. How horribly it would disrupt the lives and impact the property values of hundreds of Orange County residents in North Tustin. How completely and insanely incongruous this development would be in its proposed location.

Without addressing the human health and welfare, esthetic and property value impacts to the residents in the neighborhood of this proposal, the Draft EIR is altogether and consequentially fatally flawed.

Charles Roby
11682 Via Rancho
Santa Ana, CA
92705

chuckroby@prodigy.net

I am writing this letter in order to express my concerns and deep displeasure with the anticipated project on the Tustin Hills Racquet Club property. My family and I feel like we were blind sighted. There have been no updates or opportunities to provide any input by any member of my family in regards to this project. I purchased my home in this area for many reasons, some of which will be directly affected by this pending development. The increase in traffic will affect the noise, air quality and safety of my grandchildren who visit and play and go on walks in the neighborhood. We intentionally purchased this home at this location for the single home quiet safe neighborhood that it is. With an increase in volume in vehicles and persons, no doubt, will come an increase in accidents, fender benders, parking congestion, noise, pollution and possibly even crime. In addition, the homes in this residential area will plummet in value. Homes of this caliber have the expectation of a certain type of neighborhood. Suddenly, with the development of this project, that expectation will be squashed and the value of the homes will be directly affected. For those of us who are expecting to use equity which has been built over the years in order to secure a comfortable retirement, our homes will suddenly fall short of that anticipated security.

I behoove you to please take my comments and concerns into sincere consideration. Our family is wholeheartedly **AGAINST** the development of the condominium units on the Racquet Club property!

Thank you for your time and consideration.

Dariusz and Katarzyna Tesmer

For any additional information/opinions or communication on this topic, please do not hesitate to contact us in any desired form:

714-838-3208 (home number)

714-342-3542 (Katarzyna Tesmer cell)

818-681-3321 (Dariusz Tesmer cell)

darek8826@yahoo.com (Dariusz Tesmer email)

ktesmermd@hotmail.com (Katarzyna Tesmer email)

11851 Simon Ranch Road
Santa Ana, CA 92705

My family and I are not completely against development of the property now known as Tustin Hills Racquet Club, just against the proposed development of high-density housing in an area that is far from that.

Our community has half acre lots with one egress and one ingress into our small enclave. Thirty-seven condominium units added to our community will negatively impact, not only our neighborhood, but the surrounding region. Instead of one housing unit/22,000 sq. ft., there would be one housing unit/7,000 sq. ft. TOO CROWDED! In addition, does the one unit/7,000sq. ft. consider sidewalks, streets, parking, setbacks and turnarounds for firetrucks? This large number of structures is undesirable. Plus, the existing native vegetation is important in the constant battle to decrease the fire danger in the hills. More people and less native plants result in an increase of the fire threat in the area.

We are in favor of property owners being allowed to build whatever they want if the completed project complements and strengthens the neighborhood. (That is why there are covenants). Thirty-seven condominiums will only decrease and weaken the area. Not a suitable option! Why doesn't the developer comply with the current density? A few single-family homes would enhance the area and not be an eyesore to the homeowners.

Thank you for your attention,

Nora Clayton

noraofelia@aol.com

Canning, Kevin

From: William Dickinson <bdickins72@sbcglobal.net>
Sent: Monday, June 20, 2022 10:45 AM
To: Canning, Kevin
Subject: Planing Application No.18-0034 (Tustin Hills Raquet Club)
Attachments: raquet club.png

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Sir:

I am writing this to express our concerns about the proposed project to redevelop the Tustin Hilllls Raquet Club.

TRAFFIC AND SAFETY

Adding 37 more living units to our area is certain to add more traffic during the morning and evening business hours. The argument that the new homes do not add any more traffic than at present is faulty because the tennis traffic is spread throughout the day and evening. I think a new traffic study would be in order to confirm this. Also, has any consideration been given to the traffic problems during construction? I would estimate there would be at least 50 workers at the site at times, probably even more than that. Please picture 50 cars trying to leave the construction site at one time. Since there is only one outlet street (Simon Ranch Rd.), which has a stop sign at the three way intersection with Browning and Beverly Glen, traffic would be backed up all the way to the work site. See attached map. Making matters worse there is always significant traffic transiting through this intersection from Browning to Southeast Skyline and vica versa. Anyone trying to enter Simon Ranch Rd. from any of the sidestreets in our community would have a very difficult time doing so. Also the many people that use our streets (no sidewalks) for walking, jogging and biking would be at significantly higher safety risk. This problem woud continue to exist after construction is completed as I believe that the heaviest flow of traffic would be during morning and evening business/work travel. Heavy construction truck traffic during the day would add to this problem. We had a preview of that during the recent Tustin city water tank replacement.

RECREATION FACILITIES

Orange County is already short on recreation area so why should we destroy an existing facility, which is heavily used, that we know could never be replaced under the present conditions.

AREA VALUES/COVENANT

We live in an area where homes are located on 1/2 acre lots. Placing a condo complex in the middle of our community will certainly reduce the value of our homes. Why should we as homeowners be asked to subsidize the destruction of a recreational area that was dedicated for use in perpetuity to the residents of this communy as written in the Covenant for Tract 3883?

I appreciate your consideration of our comments.

Thank you.

Jo Ann and Bill Dickinson
2021 Lerner Ln
Santa Ana, CA 92705

Canning, Kevin

From: Lolita Tsui <lolita.c.tsui@gmail.com>
Sent: Tuesday, June 21, 2022 4:59 PM
To: Canning, Kevin
Cc: Lolita Tsui
Subject: Draft Environmental Impact Report for the Development of the Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I'd like to take this opportunity to present to you my personal concern in regards to the development of the Tustin Hills Racquet Club Property.

History:

Our family, Chester and Lolita Tsui and children, have been living on Via Rancho since 1976, one of the first residents moved into this John Little Development. We settled into this community because of its large lot size, the serene environment and the ability to participate and enjoy the recreational facilities that Racquet Club has to offer. We have, over the years, looked to expand our home base by searching other surrounding areas but none of them could offer more than the level of pleasure and satisfaction we've already enjoying here. As a result, we are still the proud owner of the same home after 46 years.

The news of Racquet Club being sold and planned to build 37 residential condominium units on less than 6 acres shocked and sadden by our community. Personally, my concerns are abundant and would like to address a few to you in the following:

Zoning: Homes built in the surrounding community are zoned for low-density dwellings with minimum of 0.5 acres per home. The new zoning that allows 37 homes to be built on 5.88 acres drastically impacts the rural atmosphere and becomes a high density pocket of homes embedded in a low density zone.

Traffic: The high density condo development will drastically generate the high traffic on our narrow, winding streets with no side walks. In addition, with only one in-and-out pathway from (Beverly Glen) to the Main Street (Browning St), the current traffic pattern will be greatly impacted.

Fire Safety: While the serenity and it's surrounding beauty where we have our homes are desirable and sought after, the threat of wildfire is never far from our mind. By increasing 37 residences in this small area with no multiple access for evacuation exit, the prospect of safely and expediently facilitate the safe evacuation of the residents due to wildfire may become a

monumental task for the fire authorities, and of course, also greatly impact other home owners in the immediate area.

Loss of Recreational Facility: All surrounding residents purchased their homes here were attracted to the rural atmosphere, open spaces and the current recreation facilities that is available to all. With the development of this high density dwellings, all we have treasured and enjoyed, the rural environment, the open spaces and the recreational facilities, will be greatly diminished in front of eyes, and certainly a feeling of the loss of community.

Thank you, Mr. Canning, for reading this email and hope you'll understand my concern from a stand point of the 46 years Racquet Hill resident. Along with all my neighbors and fellow residences, I sincerely hope you respect our pleading and make a conscious and compelling effort to address this matter so to reach a fruitful resolution.

Thank you with kind regards,

Lolita Tsui
11701 Via Rancho
North Tustin

Canning, Kevin

From: Roe Gruber <roe@escapesltd.com>
Sent: Tuesday, June 21, 2022 9:10 AM
To: Canning, Kevin
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hi Kevin,

I lost my house in the 1993 fire in Laguna Beach because the fire engines could not get into the area fast enough. The road was too narrow. The water pressure was too weak. Fires move so fast. It only took minutes to come down that hill. There were no alternatives but to run. The trauma of losing everything is hard to describe and impacts your life forever after.

With the THRC, we have an even worse situation: a very narrow road in, very limited access, a canyon type setting that would give a raging fire enough ammo to destroy everything in its path. Roads get clogged quickly which could contribute to loss of life as we have seen in Northern California. To approve a project this risky and then wait for disaster to strike is unconscionable.

And then there is the issue of cramming that many condos into a neighborhood that has single family homes with decent size yards. It would destroy the entire essence of this area and impact all of us very negatively. We would have to deal with serious traffic issues on Simon Ranch Road. That many units would increase the number of cars traveling up and down dramatically.

It is not realistic to change an entire neighborhood simply because a developer wants to make a ton of money. That is what this is all about, an opportunity for a developer to sell condos at a high price and make millions, at the expense of everyone that lives here. It is morally and ethically wrong to allow this to happen when it impacts so many people.

Besides the fire hazard, the traffic problem and the impact on our neighborhood, the THRC was designed as recreational space in the covenant so how can it be converted to condos? It has been zoned for recreational purposes and needs to stay that way.

We would all appreciate whatever you can do to keep our neighborhood fire safe and not rezoned.
Thank you,

Roe Gruber
2012 Lerner Lane
Santa Ana, CA 92705

Canning, Kevin

From: Addison Adams <Addison@adamscorporatelaw.com>
Sent: Wednesday, June 22, 2022 10:11 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com; Karin Adams
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property.

I play tennis at the Racquet Club and find the availability of a nearby racquet club to be a ‘public good’ even though it is a private club. Houses or condos will always be a more valuable real estate investment than a tennis club, golf course, a park, or open space. But if all of these properties are allowed to be developed into houses, then there will be no tennis clubs, golf courses, parks or open space left for people to enjoy. This is why we have zoning and a general plan. Let’s not change the general plan or the zoning in this case. There are no other tennis clubs nearby. Where will everyone go? Somewhere far, that’s for sure. Do we really want a homogenous carpet of housing with no amenities for residents to enjoy? Of course not.

The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC. Please send a strong message that the zoning will never be changed and the developer should abandon all hope of making a short term dime at the expense of the long term benefit of the community.

Thank you,

Addison K. Adams
310-339-6574

Canning, Kevin

From: Amy Allen <amyallen1222@gmail.com>
Sent: Wednesday, June 22, 2022 5:11 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT.

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Amy Allen

Canning, Kevin

From: Amy connelly <amyconnelly73@gmail.com>
Sent: Wednesday, June 22, 2022 3:19 PM
To: Canning, Kevin; kirkwatilo@gmail.com
Subject: Fwd:

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

----- Forwarded message -----

From: Amy connelly <amyconnelly73@gmail.com>
Date: Wed, Jun 22, 2022 at 2:44 PM
Subject:
To: <kevin.canning@ocpw.oc>, <kirkwatilo@gmail.com>

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Amy Connelly

Canning, Kevin

From: craig sullivan <crsullivan075@gmail.com>
Sent: Wednesday, June 22, 2022 1:17 PM
To: Canning, Kevin; KirkWatilo@gmail.com

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,
CRAIG

Canning, Kevin

From: Fred and Eileen <fedannov@cox.net>
Sent: Wednesday, June 22, 2022 3:29 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Save the Racquet Club - deny Beauchamp development!

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

To Whom it may concern:

I am a 60-year resident of the North Tustin area, and am writing to voice my opposition to the planned residential build on the current Tustin Racquet Club property.

My concerns are as follows:

- 1) Traffic in the area would increase to the point of dangerous levels, as there is only one road in and out of the 5 – acre site. The increase in cars going up and down this small road will make it a dangerous place for all current residents who walk, bike and drive these narrow streets, which have no sidewalks.
- 2) We already have many homes that rely on the current emergency response, be it fire or medical, and adding to this load on an already stretched resource concerns me greatly. Response times are already long and adding more residents to this area will overload our services. In the event of a catastrophic emergency, we would suffer greatly with too many residents trying to evacuate or need emergency services.
- 3) The loss of the Racquet Club would be a loss for the community. It serves both members and non-members as the clinics provided boast over 80% non-member participation. This is an important resource for our community where park space is limited and other facilities would not be able to accommodate the additional people.
- 4) Most of the residents here in North Tustin have their life savings based on their homes. We rely on the maintenance of property values, and know that if this project goes forward, we will all suffer from a loss in our homes' value. This is avoidable.

I have watched our community develop since 1963 – carefully preserving a countryside feel. It is what brought my husband and I here so many years ago. We raised our children here, with so many other families whose children have remained in the area and done the same. This has created a close-knit, multi-generational community. I consider the proposed development detrimental to all but the developers who will profit. Even the new occupants of this development would suffer from a badly planned and executed project.

I urge you to oppose this project coming to fruition. This will be bad for all involved, other than the financial interests of Tracy and David Beauchamp.

Thank you for your consideration.

Sincerely,

Eileen Braun
Resident, North Tustin

Canning, Kevin

From: Elizabeth Leahy <elizabethleahy21@gmail.com>
Sent: Wednesday, June 22, 2022 11:25 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Canning, Kevin

From: Emily Frye <fryesocal@mac.com>
Sent: Wednesday, June 22, 2022 12:11 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of North Tustin. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bobcats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Gary & Emily Frye

Canning, Kevin

From: Harold Marshall <halowha@sbcglobal.net>
Sent: Wednesday, June 22, 2022 5:05 PM
To: Canning, Kevin
Cc: kirkwailo@gmail.com
Subject: Save The Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr Canning,

61 years ago, my family moved into a new house/home at 12561 Browning Ave, just south of La Colina Dr and just north of Tustin Memorial elementary school. At that time there were no homes on the west side of Browning Ave north of La Colina or in the hills above now called Red Hill Ridge, an area that is the location of the Tustin Hills Racquet Club.

Over those 61 years we have see the construction of many new homes in this area. All these homes have been highly desirable properties with large homes on large lots, making for a much sought after area for enjoyable family living. And now the owner of the property proposes to build 37 new homes with the inevitable increases in vehicle traffic on the surrounding streets and neighborhoods for many years during construction and forever after on daily basis. This is a gross degradation of the environment.

No one can argue that replacing a highly desirable recreational area without homes to an area with 37 multifamily properties squeezed into an area with a housing density 4 times the current housing is an acceptable alternative for the surrounding home owners. This high density housing development that will negatively affect the home values of the surrounding community in order to line the pockets of the developer should not be allowed, even if new zoning would permit it.

With all due respect to the recommendations displayed in the property EIR, I request that the County Planning Department disapprove the development in support of the long term interests of the surrounding community. Thank you very much for considering the above thoughts.

Very truly yours,

Hal Marshall
12561 Browning Ave.
North Tustin, CA 92705

Canning, Kevin

From: Jennifer Wilson <decadentjw@gmail.com>
Sent: Wednesday, June 22, 2022 8:36 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bobcats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,
Jennifer Wilson

Canning, Kevin

From: Kate Dearstyne <kdearstyne@londenz.com>
Sent: Wednesday, June 22, 2022 10:44 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am writing in relation to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of North Tustin, and our sons have long benefitted and enjoyed tennis clinics and camps held at THRC. The THRC offers numerous, valuable services to its members as well as to the community as a whole. We regularly enjoy walking / running / cycling in the peace and quiet of the surrounding neighborhoods. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you.

Sincerely,

Katharine Dearstyne

Canning, Kevin

From: Ken Higman <ken.higman@gmail.com>
Sent: Wednesday, June 22, 2022 4:18 PM
To: Canning, Kevin
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

I just read the “Ranch Hills Planned Development Draft EIR” prepared by the County for the proposed housing development located at 11782 Simon Ranch Road (Application nr. PA180034).

I was surprised to see the stated conclusion that this project will have minimal or no impact in each of the categories outlined in the report.

I have lived in this neighborhood for approximately 30 years and love living here. It is very disheartening to think the nature of our neighborhood will be radically changed because of a developer’s profit motive.

I live on a street that feeds directly to the proposed site and am confident my street will become a high traffic corridor for these 37 new homes when considering multiple residents in each home, deliveries, guests, etc.... It will be a constant hum of traffic. And walking / running, things I enjoy doing on our streets given we have little or no sidewalks, will become dangerous.

My other concerns are as follows:

- Evacuation / fire safety. There is only one road to enter and exit this development, and there are no sidewalks. In the event of an emergency, this could present a significant danger for the residents within the tract as well as the surrounding neighborhood. As noted earlier, I live on a street directly feeding into this proposed site. Evacuation The increased density of the proposed street will directly impact me and my neighbor’s safety. I hate to think what could happen if there was a fire just inside the entrance to that new development where residents could not get out, a scenario not unlike what happened in Paradise up north in Butte County.
- With 37 new homes, traffic will increase on the streets leading to and surrounding the planned site. Our roads are winding and without sidewalks in many places. This will increase the risk to the many pedestrians in our community. Air and noise qualities will be impacted as well. Noise, traffic, and road closures will all have an adverse impact on our neighborhood during the construction.
- This project requires a zone change, something our community is against and that sets a bad precedent for future developments. Our existing neighborhood has a unique character with open spaces, views, and low-density housing This development will change the character of our neighborhood and will have a negative impact on our way of live here not to mention property values.
- This is the only site in N Tustin zoned for recreational open space. It is a place we have cherished for decades, and we hate to see It eliminated to benefit a private developer.

Several statements referenced in the impact report seem to be based on questionable assumptions about the current use of the property. Examples include an assumption that traffic flow would decrease with the planned development. Adding 37 homes which would be occupied continuously with additional traffic from guests, workers, deliveries, etc.... will surely result in an increase of traffic over current levels. It’s also questionable about the revised methodology on the traffic study which resulted in a lower count. I would like to see an independent audit of this study given it seems to

contradict common sense on the negative impact this new development will have on traffic and safety to our community. Thirty-seven single family homes will surely result in additional traffic and congestion than what exists today.

I believe this draft EIR is inaccurate and am opposed to the planned zone change and development of this property.

Sincerely,

Ken Higman

2242 Salt Air Drive

Santa Ana CA 92705

Canning, Kevin

From: Ken Whittaker <1234kw1234@gmail.com>
Sent: Wednesday, June 22, 2022 2:11 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

To: Kevin Canning

I just read the "Ranch Hills Planned Development Draft EIR" prepared by the County for the proposed housing development located at 11782 Simon Ranch Road (Application nr. PA180034).

I am opposed to the planned zone change and development of this property.

I was surprised to see the stated conclusion that this project will have minimal or no impact in each of the categories outlined in the report. My concerns are as follows:

- **Evacuation / fire safety.** There is only one road to enter and exit this development, and there are no sidewalks. In the event of an emergency, this could present a significant danger for the residents within the tract as well as the surrounding neighborhood.
- With 37 new homes, **traffic will increase** on the streets leading to and surrounding the planned site. Our roads are winding and without sidewalks in many places. This will increase the risk to the many pedestrians in our community. Air and noise qualities will be impacted as well. Noise, traffic, and road closures will all have an adverse impact on our neighborhood during the construction. In the event of any emergency, these factors would increase danger as well.
- This project **requires a zone change, something our community is against** and that sets a bad precedent for future developments.

- The existing neighborhood has a unique character with open spaces and low-density housing. This project will change that feature that we value and will obstruct views of neighboring houses.
- This is the only site in North Tustin zoned for recreational open space. It is a place we have cherished for decades, and we hate to see it eliminated to benefit a private developer.

Several statements referenced in the impact report seem to be based on questionable assumptions about the current use of the property. Examples include an assumption that traffic flow would decrease with the planned development. Adding 37 homes which would be occupied continuously with additional traffic from guests, workers, deliveries, etc.... will surely result in an increase of traffic over current levels. It's also questionable about the revised methodology on the traffic study which resulted in a lower count. I would like to see an independent audit of this study given it seems to contradict common sense on the negative impact this new development will have on traffic and safety to our community. Thirty-seven single family homes will surely result in additional traffic and congestion than what exists today.

I believe this draft EIR is inaccurate and **I am opposed to the planned zone change and development of this property.**

Sincerely,

Kenneth M. Whittaker, MD

11588 Plantero Dr.

North Tustin, CA 92705

cc: Kirk Watilo

Canning, Kevin

From: Kevin Bussell <kbussell@landscapelocators.net>
Sent: Wednesday, June 22, 2022 10:27 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 37 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Kevin Bussell

Canning, Kevin

From: Kris Caiozzo <kecaiozzo@gmail.com>
Sent: Wednesday, June 22, 2022 10:12 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: THRC zoning plan

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,
Kris Caiozzo

Canning, Kevin

From: Laura Thorne <laurat@sevengables.com>
Sent: Wednesday, June 22, 2022 11:20 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: No rezoning!

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

My family and I are residents of North Tustin. We have lived here for over 15 years. I grew up in North Tustin as did my husband. We are heavily involved in our community through volunteerism, our public schools, and sports. The THRC offers numerous, valuable services to us and provides valuable, open space. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

Please consider your residents and our community (those who have supported North Tustin for years...don't turn on us now) and the major impacts we will incur with any rezoning.

Thank you,
Laura Thorne
(714) 420-5332

Canning, Kevin

From: Leah Katnik <leah.katnik@gmail.com>
Sent: Wednesday, June 22, 2022 1:26 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Save the racquet club!

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,
Leah Katnik

Canning, Kevin

From: Lori Sullivan <loripsullivan1@gmail.com>
Sent: Wednesday, June 22, 2022 9:36 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: ranch hills development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

In addition, the three way stop at the corner of Browning and Skyline will become a congested nightmare with additional cars due to the development as well as construction.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,
Lori Sullivan

Sent from my iPhone

I am writing this letter in order to express my feelings in regards to the pending project on the Tustin Hills Racquet Club property. I lived in this neighborhood for many years with my parents during my childhood and young adulthood years. I have always loved the beauty, peace and quiet of this neighborhood. My parents continue to reside there and I visit them frequently with my own family. We have a small child whom my dad takes for walks frequently during our visits. I am concerned with the increase in the level of noise and traffic congestion, as well as the decrease in safety and parking opportunities that will come with a project such as this, being that my parents home is doors down from his location.

I humbly request that you take my words and concerns into consideration pending a decision on whether this project should proceed. Take a moment and imagine this being YOUR home. YOUR neighborhood. YOUR security. YOUR comfort. **DO NOT ALLOW THIS TO HAPPEN.** It is not fair to the residents of this community who purchased these homes for very specific reasons, all of which will be shattered by such an unprecedented development.

Thank you.
Magdalena Tesmer

For any additional input, please do not hesitate to contact me.

Cell: 714-342-3542
Email: maggie66143@hotmail.com
Address: 5152 Marmol Drive, Woodland Hills, CA 91364

Canning, Kevin

From: Regan Phillips <regan.phillips@gmail.com>
Sent: Wednesday, June 22, 2022 6:59 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Save the Tustin Hill Racquet Club - Response to County's Environmental Impact Report

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. We are members at the THRC where we enjoy playing pickleball; it's where my children took swimming and tennis lessons; where their preschool performances were held; it's the venue for our school fundraisers, and it is a *very* special place for our family. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bobcats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,
Regan & Ben Phillips

--

Regan Dean Phillips

Canning, Kevin

From: Sarah V Williams <alstonandsarah@mac.com>
Sent: Wednesday, June 22, 2022 12:00 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,
Sarah Williams

From: dahlsteven8@gmail.com
Sent: Wednesday, June 22, 2022 4:53 PM
To: Canning, Kevin
Subject: Tustin Hills Racquet Club rezoning objection, EIR response

Follow Up Flag: Follow up
Flag Status: Flagged

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am emailing you regarding my position on the proposed Tustin Hills Racquet Club re-development effort (aka, Ranch Hills) following the recently published "Ranch Hills" Planned Development EIR. My June 1, 2020, email to you on the same proposed project is included below for reference. The points listed in that email remain valid.

Regarding the EIR in question ("Ranch Hills Planned Development Planning Application NO. PA 18-0034 Draft Environmental Impact Report (EIR) County EIR No. 635 SCH No. 2021060400 Volume 1"), the following are my comments and input for review by Orange County. Thank you in advance for your time on the subject.

As a resident of the Red Hill Ridge neighborhood, Lemon Heights, and Orange County, I am strongly opposed to the rezoning of the Tustin Hills Racquet Club site. This facility and its recreational/event services have been a highlight of North Tustin for roughly 60 years, and an essential element of why my wife and I purchased our home here 21 years ago.

Rezoning this land would be tragic and harmful to North Tustin. And replacing this prized facility with high-density housing, in the middle of a low-density 60 year old neighborhood, would negatively impact the extended community in a multitude of ways.

- EIR Project Objective 1 falsely claims the project would "provide homes that would meet the increased demand and shortage of housing in the North Tustin community, especially for people that want to downsize but stay in the same general area." The statement regarding a targeted downsizing demographic is baseless for many reasons, including:
 - The price point of the proposed homes, at \$1.5M, is an illogical purchase for downsizing. More specifically, the annual tax rate of a \$1.5M home would likely dramatically increase the annual tax cost for a retiree. Additionally, moving to a 2-story home with stairs makes no sense for an aging/"downsizing" demographic.
- EIR Project Objective falsely 3 claims the Project will reduce impacts on the circulation network and reduce traffic and other environmental impacts of the Project site. This is also a false statement, as the proposed development is likely to

bring roughly 130+ new full-time residents (3-4 people per home) that will come and go several times per day, which far exceeds the current average occupancy and vehicle load of the tennis club, particularly during peak morning and evening traffic cycles. Additionally, the existing entry/exit to the proposed site is dangerous. It is not at a formal nor safe intersection, and the geography of the roads in that area has multiple blind spots due to steep slopes, complex curves, and mature landscaping. Additionally, there are no sidewalks for the consistent volume of walkers in the area use the street, that would increase significantly with this proposed development.

- The proposed Ranch Hills density far exceeds that of the Red Hill Ridge neighborhood. The “legacy” Red Hill density is roughly 2 homes per acre, or 21,000 sq ft per lot, excluding roads. The proposed lot size of Ranch Hills appears to be roughly 4,000 sq ft per lot (56’ x 72’, via the Site Plan using included dimensions as a scale reference), or roughly 500% more dense than the Red Hill surrounding lots average. The EIR deceptively includes roads and common space in the Ranch Hills lot size/home calculation, which is inconsistent for surrounding lot size comparison, which should be corrected for the EIR official public reviewed. And the Ranch Hills roads will have far less parking capacity (1 side parking only) than the surrounding legacy roads of Red Hill Ridge, likely resulting in many Ranch Hills cars being parked on streets outside of the Ranch Hills zone, or unsafe parking within Ranch Hills. As a reminder, Ranch Hills would only be accessible via the single access point of Simon Ranch Road.
- The proposed aesthetics of Ranch Hills will be significantly different than the surrounding Red Hill Ridge homes/sites/streets. Per the EIR, the proposed units will have attached walls and zero lot line construction, driveways too shallow to hold a typical car (per the EIR rendering, a Mini Cooper will barely fit in the driveway, so the vast majority of cars will all extend into the Ranch Hills streets), front yards that are only 10’ feet deep, streets only wide enough for parking on one side, etc. Also of note is the 2-story structure height, which was not permitting in the first row of Tustin Ranch homes just south of the tennis club (per a mandated development requirement of that neighborhood, this row of homes could only be only story tall as an aesthetic line of sight requirement for the tennis club view). Additionally, the loss of 6 acres of beautiful open space to the neighborhood would be very impactful (mature trees, grass, tennis courts, pool, etc.).
- The proposed Ranch Hills development is in direct violation of the Red Hill Ridge neighborhood covenants on record with Orange County, established when the neighborhood was originally developed in the early 1960’s. This covenant was known by both the seller and recent buyer of the tennis club, who are now trying to violate this covenant. The EIR does not surface nor explain this covenant, much should legally be factored in development review.
- The EIR process surveyed the project site on March 30, 2021 (one day only) to determine the existing wildlife, and inaccurately identified just lizards and rats. Red Hill Ridge is in fact inhabited by many more species including: bobcats, raccoons, coyotes, owls, hawks, falcons, a wide array of resident and migratory birds (swallows, parrots, doves, finches, hummingbirds, and many more), rabbits, mice, gophers, snakes, beehives, etc. Given the lot sizes and abundance of mature vegetation, the wildlife ecology is very diverse.

- Over the last 5 years, the “developer” (including the current club owner, development team, and legacy tennis club owner who still has a financial stake in the project) has been dishonest and disingenuous with the North Tustin community and Red Hill neighborhood on multiple occasions. The outcome of the Ranch Hills EIR is no different, as it is deceptively skewed to the developer’s interests. It’s clear their financial interests are at the core of their mission, not the good of the neighborhood, North Tustin, nor the interests of Orange County at large.

Respectfully,
Steven Dahl
dahlsteven8@gmail.com
2152 Liane Lane
Santa Ana, CA 92705
714-414-7485

From: Canning, Kevin <Kevin.Canning@ocpw.ocgov.com>
Sent: Monday, June 1, 2020 12:31 PM
To: Dahl, Steven <Steven.Dahl@disney.com>
Subject: RE: Tustin Hills Racquet Club rezoning objection

Received, thank you

Kevin Canning | Contract Planner | OC Development Services / Planning
601 North Ross Street | Santa Ana, California 92701-4048
714.667.8847 | kevin.canning@ocpw.ocgov.com
Visit us online for permitting applications/project status at <https://myoceservices.ocgov.com/> or general questions and assistance call 714 667-8888

NOTICE: THE COUNTY SERVICE CENTER ON THE FIRST FLOOR WILL BE TEMPORARILY CLOSED TO THE PUBLIC UNTIL FURTHER NOTICE. Online services remain accessible 24/7.

ADDITIONALLY, DEVELOPMENT SERVICES/PLANNING STAFF WILL BE WORKING ON A ROTATING SCHEDULE IN OFFICES AND ALSO REMOTELY. RESPONSE TIMES MAY BE AFFECTED. YOUR PATIENCE IS APPRECIATED.

From: Dahl, Steven <Steven.Dahl@disney.com>
Sent: Monday, June 1, 2020 12:17 PM
To: Canning, Kevin <Kevin.Canning@ocpw.ocgov.com>
Cc: Dahl, Steven <Steven.Dahl@disney.com>; Julia Dahl (juliadah1@sbcglobal.net) <juliadah1@sbcglobal.net>; kirkwatilo@gmail.com
Subject: Tustin Hills Racquet Club rezoning objection

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

My wife and I have owned the home at 2152 Liane Lane, just 3 lots from the Tustin Hills Racquet Club, since 2001. Our family of four has been regular club members most of those 19 years for tennis, swimming, fitness, and social activities. We have also attended many events at the tennis club, including school fundraisers, weddings, and community receptions. The Tustin Hills Racket Club has been landmark feature of our neighborhood, and North Tustin, for nearly 60 years, and one of the primary attractions of our original purchase. We would be angry and disappointed if the county approves the proposed rezoning and high density residential development of the club property, as this would significantly impact the quality of life for many community residents, the value of our home(s), and be a grave violation of trust by our county officials.

Rezoning this land from recreation to residential, with permission to build high density housing, would be highly destructive. The CEQA INITIAL STUDY PROPOSED MITIGATED NEGATIVE DECLARATION assessment is fundamentally flawed as a result of ignoring / not checking key elements of Table 2 (page 4), including Aesthetics, Noise, Population and Housing, Recreation, Land Use and Permitting. Each of these points is critical to the zoning and usage of this land plot, and by not assessing them objectively and thoroughly, the study presents biased, misleading, and inaccurate conclusions.

- The proposed development aesthetics are in conflict with the surrounding area (Red Hill Ridge/Lemon Heights/North Tustin) in the context of cookie cutter tract repetition, lot size/land use/human/parking density, attached walls/roofs, and zero lot line geometry with driveways so small that vehicles will hang into the streets. These characteristics are what most in Lemon Heights despise, and why we choose to invest in Red Hill Ridge/Lemon Heights/North Tustin versus other communities like Tustin Ranch and Irvine. More specifically, the home owners in Red Hill Ridge Estates invested in the neighborhood largely because of the large lot sizes ($\frac{1}{2}$ acre and larger), large homes (3,500-8,000 square feet), the aesthetics of a more traditional custom home community, the privacy created by the hills/mature vegetation, and single road access. The proposed development does not respect the 60 year characteristics of the Red Hill Ridge Estates design standards, zoned building requirements, and the formal Red Hill Ridge Estates "Declaration of Restrictions" (Tract No. 3883, Red Hill Ridge Estates, recorded Aug 22, 1962, by Ruby McFarland, County Recorder, Orange County).
- The noise/congestion/vehicle and human traffic/dust in Red Hill Ridge will spike during construction (estimated at 2+ years). And remain higher permanently due to this proposed plot of 37 high density homes (perhaps 110 new residents; note, this density is roughly 24 people/acre, versus existing homes at roughly 6 people/acre; with proposed development netting 4.5 acres for housing, excluding land for roads, and assuming 3 people/home).
- One specific traffic safety risk will be the intersection of Simon Ranch Road, Liane Lane, and Valhalla, just 50 feet from the only drive entrance of the proposed development (the hills, curves, sunlight angles, and vegetation can make visibility very challenging at this intersection). And our street, Liane Lane, will be impacted, since it is less than 100 feet from the tract, and the only flat street for walking in the neighborhood. The club activity and traffic has always had minimal impact on the neighborhood, given club traffic is off-hours, parking never overflows onto the residential streets, visitors stay on the club property, and consistent club operating hours.

- The club has been a local fixture nearly 60 years, for both members and non-members. Closing it would be equivalent to closing one of our larger public multi-use parks, relative to number of visits/week, sporting capacity, and acreage. It is essential to the local tennis community given very limited public courts capacity (and long weekend/evening wait times), including frequently use by non-members (for weekly group clinics, tournaments, lessons, and fundraisers). And the pool and indoor/outdoor events facilities are also essential to the area's overall recreational and events capacity (once again, for non-members as well, including swim lessons, weddings, and other events).
- There have been several market value offers to purchase and continue the club operations over the last few years, but the owner has been more interested in the potential golden egg offer of a developer, sadly ignoring the legacy zoning and best interests of residents (the core of his customer base and personal income for decades).
- The proposed loss of recreation land and facilities would be a major blow to the community at large. And the proposed rezoning and high density housing would be in direct conflict with existing zoning, and the immediate and surrounding neighborhoods.

Closing the club would result several job loses for club staff, including sales, service, maintenance and custodial, and tennis and swimming instructors. The developer can build somewhere else that could compatibly support high density housing, without the net result negatively impacting jobs/tax revenues/housing capacity.

Don't be swayed by the distorted proposal of the developer. The rezoning and development of this land will be destructive to the community at large, and highly destructive to the 126 existing Red Hill Ridge Estates homeowners.

Respectfully,
Steven Dahl

steven.dahl@disney.com
2152 Liane Lane
Santa Ana, CA 92705
714-414-7485

Canning, Kevin

From: Trina Torres <trinaleatorres@gmail.com>
Sent: Wednesday, June 22, 2022 8:32 PM
To: Canning, Kevin

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Canning, Kevin

From: Ahern, William <WAhern@allenmatkins.com>
Sent: Wednesday, June 22, 2022 9:27 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com; Jen Ahern
Subject: Save the Tustin Hills Racquet Club - Response to County's Environmental Impact Report needed!

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to **ANY** zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be **catastrophic** to the North Tustin community.

My family and I have been residents of Tustin/Santa Ana for over 20 years. I was very active in working with the Park System in preventing Peter’s Canyon from being paved, which effort was spearheaded by the local bike shops, and driven by a purely profit motive to the disregard of other park users. While some maintain that California is in need of more housing (note - various economists debate this contention), those needs are being met with several large scale developments currently being built-out, and the construction of large apartment and condo complexes being built next to freeways and other areas that can accommodate the density. E.g., the IBC. In addition, the challenges presented by “return to office” protocols being ignored or not implemented at all, you will likely see the conversion of office to housing in the near future. These conversions are already taking place in NYC. These projects are being undertaken by responsible developers not driven purely by a project motive. Without question, this project is not only purely for profit by a small-time developer, backed by a wealthy OC family only looking to prove the next generation can grow the family fortune, it is an irresponsible use of the land not compatible with the surrounding area. To my knowledge, neither the developer nor investor have any ties to the North Tustin Area. This deal reminds me of a hedge fund going into a small town, buying a company and selling it off the pieces, only to make a profit, without regard to the community it is destroying in the process. I strongly believe that this project, if approved, will be one of the first that will lay the groundwork for the destruction of the North Tustin Area.

As has been pointed out by numerous other residents, the THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. Residents need a place to recreate - otherwise – what is the point of living here?

The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. **Accordingly, I strongly oppose the proposed development to the THRC. Finally, if you let this development go through, it will lay the precedent for other irresponsible projects, incompatible with the area, and undertaken by developers seeking to pick the low hanging fruit and making a quick buck, rather than undertaking responsible, meaningful development.**

Regards – William Ahern, Esq.

intended only for the use of the intended recipient and may be confidential and/or privileged. If any reader of this communication is not the intended recipient, unauthorized use, disclosure or copying is strictly prohibited, and may be unlawful. If you have received this communication in error, please immediately notify the sender by return e-mail, and delete the original message and all copies from your system. Thank you.

Canning, Kevin

From: Claire Annarella <cannarella@peacockpiper.com>
Sent: Thursday, June 23, 2022 2:08 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Zoning Changes Opposition: Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to **ANY** zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Claire Annarella

Canning, Kevin

From: Dan & Nancy Chapel <chapel@cardwellhillwine.com>
Sent: Thursday, June 23, 2022 10:47 AM
To: Canning, Kevin
Cc: Dan & Nancy Chapel; Jon Sullivan; kirkwatilo@gmail.com
Subject: TUSTIN HILLS RACQUET CLUB DRAFT EIR
Attachments: OVERVIEW COMMENTS TUSTIN HILLS RACQUET CLUB CONVERSION TO HOUSING.docx

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Kevin: I am respectfully submitting comments to PLANNING APPLICATION NO. PA 18-0034,
RANCH HILLS PLANNED DEVELOPMENT DRAFT EIR

My wife, Nancy Chapel, and I purchased 2181 Racquet Hill Drive during construction Valentines Day 1976. We have enjoyed the quiet and ambience of our neighborhood all these years. We frequently use the passageway from Racquet Hill Drive to the Tustin Hill Racquet and Pickleball Club. This access way was presented to the community by one of the other original owners on Racquet Hill Drive. Should this project be constructed we would loose the accessway and also see the two story development from our residence.

Attached are my detailed comments and analysis of this project. In summary:

Orange County does not need this project.

Do not tear down and rebuild. Use existing facilities. Do not create more waste and pollution.

The project will create waste, more short term and long term pollution, short term and long term increased safety hazards.

Respectfully,

Dan G. Chapel

Owner, 2181 Racquet Hill Drive.

Cell 714 604-6427

714 730-0608

Email chapel@cardwellhillwine.com

To Kevin Channing

COMMENTS TO RANCH HILLS PLANNED DEVELOPMENT DRAFT EIR

PLANNING APPLICATION NO. PA 18-0034

TUSTIN HILLS RACQUET CLUB CONVERSION TO HIGH DENSITY HOUSING.

An Environmental impact draft of a proposed plan to destroy the existing tennis and pickle ball club has been issued for review and comment by the Orange County Development Services. Following destruction there is a proposed plan to construct 37 housing units in the limited pace of 5.88 acres. In addition to concerns about the quantitative aspects of air quality, water quality and supply, storm water runoff and noise abatement. There are many aspects of this project that are non-conforming to the long-term standards and norms of the existing residential area. This document addresses both the quantitative aspects of the environment and the societal concerns such as lack of recreational facilities and the non-conforming aspects of this project on the neighboring community. There are short and long-term issues with traffic flow and safety to those already living and attending elementary schools in the area.

Here are comments about the developers three objectives for the subject project.

Objective OBJ-1 There are many large project residential projects in Orange County that have been recently completed or are being developed to provide significant additional housing. The developers have not demonstrated the need for this 37 unit project jammed into an existing 5.88 acre sports and recreation area. It is not clear if there are CC&R's to monitor and control the extensive vegetation required in the perimeter of the project. Orange County does not need this project.

Objective OBJ-2 The minimal environmental impact is to leave the facility as is! A three-year project involving the complete destruction of tennis, pickleball, swimming facilities, club house, entertainment area and parking has considerable environmental impact. Then to construct 37 units in very close proximity to long term residential homes with only a 25 ft. perimeter setback has significant CO₂, methane, NO_x, particulate emissions and noise impacts. The traffic impact from residents in 37 units that will have 24 hour ingress and exit does not comply with minimal environmental impacts. The concept of tear down and rebuild over extensive periods of time is totally inconsistent with minimal environmental impact. This objective is a false representation.

Objective OBJ-3. Not true. The project significantly increases construction traffic including diesel trucks, 53 ft delivery trucks, debris removal, installation of a large concrete crushing machine, many vehicles for equipment and supplies throughout the three-year program. In addition, there will be many vehicles driven by workers and inspectors. Salt Air, Pavillion, Skyline, Browning, La Colina, Beverly Glen and Red Hill will be affected on a 6 day a week basis. None of these narrow routes are truly adequate to supply a major building project. Increased collisions on these narrow residential streets is expected. The project will affect vehicle traffic all the way to Tustin Ranch Road, Irvine Blvd and Newport Avenue. Many residents in this area use the club and adjacent streets for daily walks. Thus, there are major safety issues for residents in the area walking and driving for an extended time.

During the three- year project and afterwards, there will be a significant increase in vehicle and truck traffic in the vicinity of Red Hill and Browning Avenue schools. These areas are already impacted by traffic congestion. This project will increase safety issue for children, teachers and parents driving students to and from school. The impact during construction is very significant. Further, upon completion new residents adding to rush hour traffic combined with school traffic will be of major concern. After construction there will be mail trucks, garbage trucks, FedEx/UPS delivery trucks, gardening trucks and others that this EIR does not address. The impact is permanent!

The extensive generic tables in the draft EIR do not take into consideration traffic density, peak traffic periods, street size and configuration and sensitive areas such a schools and very narrow streets. Further there are no plans for the control of very large trucks and equipment during school and rush hours. Are large trucks and equipment entering and leaving the project in early morning and late evening hours impacting the quality and safety of the neighborhood? Safety and ease of access are major concerns.

In summary none of the 3 objectives make sense or are accurate representations of the project.

SMALL BUSINESS SHUTDOWN

This project destroys the business at the club of four time All American University of Southern California tennis player Mr. Tim Paucett. This outstanding athlete, who has beaten Pete Sampras, is a guiding light to children and young adults who take his classes. In a nation and world where young people have safety and motivational concerns Tim is a very positive guiding light. His outgoing personality is instrumental in developing young people with positive and inspirational aspects at a key time of their life. This project also destroys the swimming pool activities and the business of a Pilates trainer.

Traffic patterns lightly addressed in the document need further evaluation and clarity. There will be a number, not identified, of 53 ft diesel powered trucks delivering supplies and equipment to the site over the three- year time span. In addition, there will be large grading machines and a host of delivery trucks. Many workers arriving at the 7:00 start and 6:00 termination hour will increase traffic during the traditional high density commuting hours. At present there is heavy morning and mid- afternoon school related traffic on Browning and Red Hill streets. Additional construction related traffic will negatively impact the community.

RESIDENTIAL AREAS ACCESS ROAD ISSUES

All access roads cited in the document have issues. All construction and daily delivery traffic will impact Simon Ranch Road that leads to the construction site. All residents of Simon Ranch road, Salt Air, Pavillion, SE Skyline, Beverly Glenn, Browning and many adjacent streets will be impacted throughout the construction by worker vehicles, delivery and construction equipment. And forever after as the population density in the area is significantly increased. Access via Red Hill must be limited to smaller trucks due to the narrow curves on Skyline Drive. Collisions on this narrow passageway are most likely.

Access from Tustin Ranch Road impacts much of Browning residents and Simon Ranch Road. Browning is currently a major issue due to narrow crowded lanes and the presence of heavy school traffic in the

morning and mid-day. Diesel driven trucks must be restricted from 7:15 to 8:30 and again during the mid-afternoon to mitigate congestion and assure safety of students. Diesel fumes on Browning will impact students in the school throughout school hours.

In summary, construction vehicles going to and coming from the construction site would have a negative and in some cases dangerous impact on an extended area, six days per week, with major concerns during rush hour. These construction issues would last for a minimum of three years. But the impact of increased population in the 37 residences will last forever.

RECYCLE ISSUES

The opening discussion refers to the 50% reuse of debris from the destruction of the facility. This number is not supported by data and is highly suspect as contractors aggressively load big trucks to quickly take debris to a land fill. If in fact there is data to support this claim, it needs to be out-lined for our review. Another negative environmental impact! Further the use of a concrete crushing machine in the middle of the site is not conforming with reference to noise pollution and particulate emissions. Road access for this huge machine is non-conforming and unacceptable. We request that a public monitoring committee of local residents be established to monitor the applicants statement of 50% recycle of all debris. This is a very high target considering the nature of the extensive rework of the site.

TERMINATION OF PEDESTRIAN WALKWAYS

The project will close the walkway from Racquet Hill Drive into the existing club parking lot. This walkway access has been in use by the public since the construction of the first phase of the John Little development in 1975/1976. This will eliminate a highly popular walking route for local residents to enjoy the ambience of our neighborhood and achieve stimulating exercise. A dead end passageway will pose an everlasting safety issue and source of trash and debris. Another non-conforming aspect of this project which may be an illegal closure. This community walkway, donated by the first resident owning that strip of land, has been a public access for about 46 years. Closure may be illegal.

COMPLIANCE WITH BUILDING CODES

Discussions with residents have raised concerns about BMP (Best Management Practices) conformance during demolition and construction. We request access to reviews of the project and reports so those citizens who have BMP prior experience can review for conformity. This is a topic that looks good on paper but easy to short change during construction. The local residents have concern that BMP will be followed and thus request access to data and inspection of the construction site.

TRAFFIC AND LIGHTING ISSUES

The opening discussion raises concerns about the accuracy of traffic and lighting at the current facility. The current parking capacity of 127 vehicles is typically 10-25% utilized. Exceptions are when events

are held at the club.. The parking area is closed from 10:00 pm to 7:00 am every evening. The proposed project configuration has up to 169 vehicle capacity for 37 units. During inclement weather there is very minimal use of the existing facility. Typically, 37 households have multiple trips daily and frequently at night. Therefore, the proposed project can easily have more vehicle traffic including late night and early morning activity. We would like to review the developer's calculations supporting the proposed plan. The developer did not address service vehicles such as Mail, garbage, fire trucks, delivery and pickup vehicles and trucks. This will be an impact forever.

Lighting is a similar issue. Residential and vehicle traffic in the late evening and at night will exceed that of the existing club where lighting is very low after 10:00 pm. and throughout the night. Again, review of the developer's calculations is needed.

PROJECT DOES HAVE AN ENVIRONMENTAL IMPACT AS NOTED IN THE DRAFT

A concern is a statement frequently used "Less than Significant " . Thus there is an impact on our community and it is ill- defined but will be present. There is a lack of calculations to support this thesis. It may be less than significant for a county official unfamiliar with the area. It could however be very significant for residents.

Three years of unceasing construction noise will clearly have an impact on those residents living nearby. Dozens of residents will have construction within a minimal distance from their homes and back yards.

I realize that mental health is possibly not an environmental issue per se. However, picture if you will living with three years of constant construction noise, dirt, air pollution and truck traffic. Not a pretty picture for the mental health of those living nearby. This is a significant impact on those facing the property line and accustomed to the quiet aspects of our neighborhood. That is why we live here!

POTABLE AND WASTE WATER TIE IN DATA

This topic needs more data namely: new lines of 8" and 12" are discussed in the document. A plot plan showing the location of all new lines, valves, traffic and pedestrian safety measures, duration of construction, and impact of all those affected by these new tie-ins to the existing system is required. The report needs proof that the existing utility systems do not need de-bottlenecking because they will be adequate for the proposed development. Also, who pays for new water lines and utilities outside of the battery limits of the proposed project? Is there any tax increase to residents in the area to pay for an extension of the existing water systems? Residents need to review the full scope, schedule and implementation plan for this important aspect of the proposed project which is outside of the battery limits of the project, but may have significant impact and safety concerns for the residents.

ELECTRIC AND NATURAL GAS TIE IN TO THE EXISTING SYSTEMS

The same issues as the water tie in needs much further definition. Scope, plot plan, duration, de-bottlenecking of existing systems. Who pays for the offsite scope of work? Any tax increases for those in the neighborhood? Mitigation plans for those impacted on Salt Air, Pavillion Drive and elsewhere?

CONSTRUCTION ACCESS DURING UTILITY SYSTEMS TIE IN

Define how proposed project construction personnel, supplies and equipment can gain access to the site when trenching and tie in to the existing utility systems is underway. Further a plan is needed for residents to gain access to their residences and how are appropriate safety measures implemented.

There is limited road access leading the proposed site and the construction traffic must be in compliance with existing residential requirements and safety. There is no mention of how this will be implemented.

In conclusion there are many issues not defined, plans developed and assurances given to local residents.

This document should be rejected.

The absolute minimal environmental and safety impacts are to do nothing. **NO CHANGE!**

Do not tear down and rebuild. Maximize the existing facilities. Do not create more waste and pollution.

Dan Galliver Chapel

Retired Senior Vice President, Technology

Fluor Corporation

Registered Chemical Engineer in California for over 50 years CH 2744

Canning, Kevin

From: Erik Tweedt <eriktweedt@cox.net>
Sent: Thursday, June 23, 2022 12:23 PM
To: Canning, Kevin
Subject: Tustin Hills Raquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

Please recognize this letter as my opposition to the proposed re-zoning change of the Tustin Hills Raquet Club.

The club - in its current form - is a tremendous asset to the community, and part of what makes North Tustin such a great place to live.

The housing density proposed for the site is not appropriate for the neighborhood, and will negatively affect our home values.

To my knowledge, there is no other recreation zoned parcel in North Tustin.

Keeping the tennis club open is also very important to the FHS Tennis program.

My wife is President of the FHS Tennis Boosters - and I can assure you that tennis club plays a big role in the success of the Foothill teams.

The club also provides a convenient place for PTA functions, booster meetings and charity fundraising.

Additionally, I cannot begin to understand how the ingress/egress requirements of the proposed project can be met.

There is only a single driveway serving this parcel. The requirements of Fire Department access alone, would seem to prohibit the proposed change.

Finally, - if a zoning change is somehow approved ... it should match the surrounding area - 1/2 acre lot size per dwelling minimum.

Thank you for your time.

Sincerely,

Erik Tweedt
11986 Red Hill Ave

Canning, Kevin

From: Mike Papac <mpapac@gmail.com>
Sent: Thursday, June 23, 2022 8:50 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com; kim papac
Subject: Response to the proposed development of the Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I have been residents of Orange County since 1977, our family has lived in the North Tustin area since 2006, and our kids along with many of our friends in the area use the Tustin Hills Racquet Club on a regular basis. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,
Mike and Kim Papac
Family of 6 Living in North Tustin

Canning, Kevin

From: swolfe34me@gmail.com
Sent: Thursday, June 23, 2022 10:54 AM
To: Canning, Kevin
Subject: Comments to Draft Environmental Impact Report

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Kevin Canning,

I hope this email finds you well.

I am a homeowner on Pavillion Drive in the city of Santa Ana. Not only did I grow up on this street as a child with my parents, but I recently purchased a home on this same street knowing the many favorable attributes of this quiet and beautiful neighborhood. This peaceful location is now in jeopardy due to the proposed redevelopment of the Tustin Hills Racquet Club (THRC). Therefore, I would like to ask that you strongly consider my objections to the Draft Environmental Impact Report (EIR) for the potential redevelopment of the THRC.

My first and most important concern regarding the proposed project is its impact to the properties in the surrounding areas. As you are most likely aware, the proposed project has a significantly higher density than any of the surrounding developed neighborhoods. As such, the existing neighborhoods would be negatively impacted in many ways. Not only would property values in the surrounding neighborhoods be negatively impacted by smaller units and lot sizes, but the overall layout and aesthetic environment would be permanently harmed by such a development. This neighborhood was planned and built many years ago and is not designed to handle high density housing. Having this many housing units crammed into this small space would disrupt the design of this neighborhood and would create many safety and environmental problems. Please think of the increase in traffic, lack of emergency evacuation in the event of a fire or national disaster, and the disruption to wildlife in and around this environmentally sensitive area. The EIR attempts to address and mitigate these issues by using misleading study data and self-serving metrics and timing. Please don't fall prey to their flawed reports.

Additionally, adding this type of high-density housing in this area makes no sense. While there might be a need to provide affordable housing in some places nearby, selling high priced small units will not fill that need. Instead, it will only line the pockets of the developer and accommodate a small group of individuals.

Finally, the EIR tries to make a point that this type of development is badly needed in this area. How can this be. There are no recreational spaces or parks anywhere in this neighborhood. The THRC is a fantastic outlet for the community and is something that is greatly needed in a time where the culture is suffering from isolation and digital seclusion. We need to be outdoors and getting exercise. How can adding more construction, development, and traffic help this dilemma? The answer is it can't. City planners need to look closely at ways to save or add to our precious undeveloped areas.

I am not a professional writer and certainly have not addressed all the many facets of the EIR, but I can state that this project does not fit this neighborhood and that I strongly oppose it. Please add my comments to the many other homeowners that are also opposed to this redevelopment and remember the future generations that will be impacted by over development.

Thank you,

Steven Wolfe
Homeowner

Canning, Kevin

From: Sujata Kamdar <Sujata@gsbline.com>
Sent: Thursday, June 23, 2022 9:42 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: THRC Proposed development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to **ANY** zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of North Tustin. The THRC is an amazing community resource which allows residents of the area to come together and be active and fit. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Best,

Sujata Mody Kamdar

Chairman

Sujata@GBSLinens.com

P: 714.778.6448 | GBS Linens



Canning, Kevin

From: William Weinberg <williamweinberg@me.com>
Sent: Thursday, June 23, 2022 9:32 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: County Draft EIR-North Tustin

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Good morning,

I wanted to weigh in on the possible rezoning of the Racquet Club. I have lived in the immediate area on and off my whole life, 59 years. I have been a member of the tennis club since the 1960's.

I think the development of the club into a high density housing development would deal a terrible blow to the character and quality of the area. I will not restate what so many have said and what is outlined in the various documents filed in opposition.

My gut feeling is that what has drawn people to the area for over a half-century is the peacefulness of it, the trees, the low density and having the Club there has created a kind of centerpiece for the community. Taking that away for high density housing would just ruin the area. The need for housing is real, but this just is not the place.

Feel free to call me if you have any questions.

Bill Weinberg
williamweinberg@me.com
714.308.0577

Canning, Kevin

From: Ann Leahy Piper <annleahypiper@gmail.com>
Sent: Friday, June 24, 2022 4:13 PM
To: Canning, Kevin
Cc: kirkWatilo@gmail.com
Subject: Opposition to Rezoning of the real property at Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

Please find the response to Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. I am opposed to **ANY** zoning changes at the Tustin Hills Racquet Club (the “Racquet Club” and/or “THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I moved to Racquet Hill in 2013 from North Irvine, only a few miles away. Our backyard backs up to the Racquet Club parking lot. We intentionally purchased our home on Racquet Hill because of the large lot sizes in the neighborhood and the recreational opportunities and open space provided by the Racquet Club. Over the years, we have invested both time and money in supporting the local schools and local community athletic teams. Even before we joined the Racquet Club, our kids took swimming lessons there. Once we joined the Racquet Club, our children and I have enjoyed years of playing tennis, participating in teams and taking lessons. Additionally, I have attended numerous local school fundraisers and community service meetings at the Racquet Club. THRC has offered an opportunity to meet wonderful other local residents that we would have never met. THRC has provided the place for strong community relationships to be formed and grow. Rezoning this property would eliminate a valuable community property that services a large part of this community.

The developer, Ranch Hills Partners, & principals are not residents of North Tustin. They knowingly purchased this property with its existing zoning restrictions. The developer is only interested in making money, at the expense of the residents that have invested in their community. Notably, the residents of this community informed the Developer of their opposition to the rezoning and to the building of the condominiums before he purchased the land. However, he took the risk and moved forward with purchasing the property despite the zoning and opposition from the community. The Developers’ self-serving interest in making money should not be rewarded at the expense of the community.

The developer’s project of high-density housing of 37 condominium units on small 5,000 sq. ft. lots is inconsistent with the contiguous surrounding residential houses, which consist of half acre lots (minimum). We specifically relied on the surrounding lots size in this residential community when purchasing our home. The Draft EIR’s new traffic count methodology is questionable and significantly understates the proposed traffic impact as the study describes the entire project as “single family” (Section 1.3). The proposed project primarily exists of “multi-family” units with four times the density of the surrounding community. Many of our streets are narrow, curvy, with no sidewalks, and very few streetlights that would not accommodate increased commuter traffic. Also, the feeder streets (La Colina, Browning, Ranchwood, SE Skyline, Red Hill, Beverly Glen) into the THRC “development” would be burdened by increased *commuter* traffic. The increase in commuter traffic past the Tustin Memorial Academy grade school on Browning would be a severe safety hazard!

Additionally, the development will impact emergency management including Orange County Sheriff and Orange County Fire. It will eliminate an area that can be utilized by first responders as a staging area and/or relief center in time of emergency. It will also increase congestion when evacuation of the area is necessary, such as was required during the wildfires a few years ago that reached Peter’s Canyon. The entry point to the THRC is narrow with no sidewalks and the proposed development does not provide a secondary access. Community members, particularly in the Simon Ranch Road area, would potentially be trapped should a fire threaten that area as the pedestrian access currently in place from THRC to Racquet Hill would be closed based upon the development plans. In fact, when the 2017 fire occurred and we

were evacuated it took over an hour to get out our street and down to Tustin Ranch Road - and this was before 37 condos and likely 100 new residents occupied that property.

The Draft EIR is relying on a very broad interpretation of the Orange County General Plan land-use designation in permitting 0.5 homes per acre up to 18 homes per acre to support a high-density via SB330. The California Environmental Quality Act requires that a General Plan consistency analysis be performed, which is not in the Draft EIR. The report ignores compatibility issues with the North Tustin's land use planning that provides for low and high-density housing while ensuring land-use compatibility within the community, specifically preserving the rural land-use distinctive to the THRC area. Again, the proposed development is FOUR times the density of the surrounding community. The North Tustin community has experienced well-planned development over the years by limited commercial and dense residential housing which should be protected from developers looking to make a profit while destroying our community!

I strongly disagree that the impact of the development to wildlife would be "less than significant" as stated in the Draft EIR. Although the THRC property is currently "developed," it was built over 60 years ago and has remained substantially the same ever since. THRC provides a habitat for wildlife, including coyotes, hawks, owls, bats and even wild parrots which nest in its trees and use the THRC as hunting grounds and as a wildlife corridor. In fact, my family has seen a hawks, owls, bats, wild parrots and even a bobcat on our own property that is adjacent to the THRC. Removing the pedestrian walk-way between THRC and Racquet Hill will also impact wildlife.

I strongly oppose the proposed development to the THRC. Re-zoning and removal of the THRC into high-density housing would change the face of North Tustin. North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. Re-zoning and redevelopment of the THRC will increase commuter traffic perpetuating safety issues. The high-density plan would clog life-saving evacuation routes and strain local emergency services. Re-zoning and redevelopment of the THRC will destroy a valuable community asset that provides open space recreation and requiring community members to drive outside of North Tustin for the services currently provided by the THRC. Re-zoning and redevelopment of the THRC will push out the wildlife in this area. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost.

Respectfully submitted,

Ann Piper
2182 Racquet Hill
Santa Ana, CA 92705

Canning, Kevin

From: Sean Tully <leapnlabs@sbcglobal.net>
Sent: Friday, June 24, 2022 3:38 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Response to County's Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

We are responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised we are opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and we are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Sean and Kerry Tully

Howard C. Hay and Carol Anne Hay
11651 Plantero Drive, Santa Ana, CA 92705-3196
Phone (714) 731-6608 or (714) 673-6850
Email howardhay@gmail.com cahay@cox.net

June 25, 2022

Kevin Canning
Contract Planner, O C Public Works
Development Services/Planning
P. O. Box 4048
Santa Ana, CA 92701-4048

Also submitted by email to:
Kevin.Canning@ocpw.ocgov.com
kirkwatilo@gmail.com

Dear Mr. Canning,

We have been residents of this neighborhood since 1978. We have lived in our home continuously this entire time so we know the neighbors—new and old; we have used and enjoyed the Tustin Hills Racquet Club and all facilities; our children attended local schools. For several years we were members of the Racquet Club, but we gave up our membership because we did not play as much tennis but we continued to enjoy recreation, gatherings, meetings, fund-raising events, family parties and other community activities there that have been ongoing for all these years. It remains a vital part of our neighborhood and our community.

We oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

Regarding Traffic and Circulation: Traffic generated by the proposed high-density project will create significant adverse effects because many of our neighborhood streets are narrow, none have sidewalks, and there is minimal street lighting. We and many other residents enjoy walking and biking with pets and children, and we are very much aware that these all these activities occur on these narrow, windy streets. We believe to add traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.

Regarding Fire Safety: In the 1960s/70s, Red Hill Ridge was designed for very low-density homes. It was never intended to accommodate high-density housing. That is why we can see the narrow streets, with no sidewalks, limited lighting, and a single access point which suited this rural, quiet, low-density environment. Indeed, the single entry/exit at Simon Ranch Road clearly is insufficient and cannot safely accommodate the evacuation needs for an increased density project. Furthermore, our hillside location is situated within $\frac{3}{4}$ mile of a *Very High Fire Hazard Severity Zone*. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.

Regarding Recreation/Open Space: The EIR fails to consider the loss of this recreational open space on the community. It contends that it is private property. However, Racquet Club employees and members estimate that 80-90% of the Club's clinic tennis players are

non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a “zoned” parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents’ ratio. We believe this zoning is an invaluable asset and should be preserved for the well-being of the community.

Regarding Recorded Land Use Covenant: Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.

Regarding Affordable Housing: The project does nothing to improve the amount of affordable housing and, therefore, it should not be entitled to any density bonuses or development regulation concessions.

We respectfully submit that this ill-conceived and ill-planned project solely benefits an outside developer/investor at the expense of the community. We respectfully request that it be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents’ safety above the monetary gain of a few.

Sincerely,

Carol Anne Hay

Carol Anne Hay

Howard C. Hay

Howard C. Hay

Cc: Executive Steering Committee

Canning, Kevin

From: s Lodge <s_lodge2@yahoo.com>
Sent: Saturday, June 25, 2022 12:14 PM
To: Canning, Kevin
Cc: Kirk Watilo
Subject: Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

I would like to share my concerns regarding the proposed development of the Tustin Hills Racquet Club. Having purchased my home in 1994, I have had almost 30 years to enjoy this unique and beautiful area. Of course, there have been many changes since 1994. Residents have moved on, new families have moved in, homes have been remodeled, or torn down and built up again. This neighborhood, like every neighborhood, will continue to evolve.

Mr. Canning, I embrace change. It's not only inevitable, but I view it as an opportunity for growth and improvement. I like the Tustin Hills Racquet Club in my neighborhood. I see the lights from the courts at night, I hear the activity. But, if the existence of the THRC is no longer feasible, I am open to exploring other uses, as long as they maintain the safety and integrity of our rural-like neighborhood.

The 2018 request by Mr. Peter Zehner to rezone this property does not, in any way, maintain the safety and integrity of this community! His request seemed almost whimsical to me at the time. How could that ever happen? How could the long standing Covenant of the Red Hill Ridge neighborhood be changed by one individual or business? How does one individual or business change the zoning of a well-established community? This relatively small area was designed in the 1960's to be rural in nature, with lot sizes that were roughly 23,000 square feet and infrastructure that supported this design. Who would ever think that building 37 additional homes, with lots sizes of 5,000 square feet each, in an infill area could possibly maintain the integrity and the safety of this community?

Additionally, the Objectives outlined in the EIR Project rely on data that cannot be supported and that defy common sense. For example, I am one of several "mature" residents who would never downsize to the proposed multi unit development for every reason that has been previously presented. It is a bizarre premise, and had we been asked by the developer, we would have gladly explained the facts that support our opinions.

EIR Projects are a necessary component of any thoughtful proposal of change. But, they are meaningless, and indeed dangerous, if they are predicated on faulty data. I can find few examples of accurate and supported data in this EIR Project.

I urge the County of Orange to respond in an ethical and professional manner to the concerns of the communities of Red Hill Ridge and Lemon Heights. Orange County has a well deserved reputation for being a wonderful place to live. I ask that any development of the Tustin Hills Racquet Club be compatible with the long standing zoning standards of this area, and that it maintain the integrity and safety of this fine neighborhood.

Respectfully,

Susan Lodge
2221 Liane Lane
Santa Ana, CA 92705

Sent from my iPhone

Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
601 North Ross Street
Santa Ana, California 92701
Phone: (714)667-8847
Kevin.Canning@ocpw.ocgov.com
kirkwatilo@gmail.com

Before I express my opinion, I would like to provide you with my Credentials. I am a

- Licensed Professional Engineer. PE# 44279
- Licensed General Contractor A & B 442725
- Licensed Real Estate Agent BRE 0120538
- Certified BPOR (Broker Price Opinion Resource)

I believe many additional issues need to be addressed by the professional experts before anyone can make their final decision. Issues such as:

1. Size of the existing sewer line to handle the additional load
2. Size of the current gas line
3. Size of the existing power line
4. Required additional exits from the development for life and safety
5. Required traffic study based on additional traffic to be created by this new development
6. Effect on property values due to this development
7. Fire safety issues due to higher density

Size of the existing sewer line to handle the additional load

Possibly the existing public sewer line, when it was designed many years ago, did not consider any future 33% extra load on this line.

Normally the designer calculates the size of the required pipe based on the number of planned houses at that time and sewer demand using the code requirement sizing.

This additional load might cause this pipe to back up and create many issues for the neighborhood. When the pipe operates in its full size, there is no chance for odors to escape. Many years ago, when I had a main sewer problem and observed this line via sewer line camera, it appeared this pipe was running at its almost 80% capacity already.

Size of the current gas line

Possibly the existing Gas line, when it was designed many years ago, did not consider any future 33% additional load on this line.

Normally the designer calculates the size of the required pipe based on the number of planned houses and demand using the code requirement sizing. It is hard to predict the actual effect of this overloading of the gas line. The fact remains code has a method of designing this line based

on the demand and length of the pipe from the main source or other bigger size pipe that has been originated from.

Size of the existing power line

Possibly the existing power line, when it was designed many years ago, did not consider any future 33% additional load on this line.

Normally the designer calculates the size of the required based on the number of the planned houses and demand using the code requirement sizing.

One of the reasons every once in a while our circuit breaker trips in our houses is we apply more demand on a specific circuit that was originally designed. In the worst condition, this may cause an electrical fire. This is why we hear in the news that the recent fires were caused by power companies. Do we want to take this risk?!!!!!!

Required additional exit from the development

I don't claim that I am a fire marshal and know that much about fire safety. But I know when the occupant load of a building goes beyond a certain number. The building or the room is required to have two exits for the room and the building.

My common sense tells me in the event of an emergency, if this single exit gets blocked, how can people escape or emergency vehicles can access this development?!!

Required traffic study based on additional traffic to be created by this new development

The roads are designed based on the number of cars that will travel on them daily. The required different size sub-grade, sub-base, and asphalt thickness are based on the number this number. Recently we resurfaced the roads going to this development at Simon Ranch Road. It appeared this road was lacking sub-base and sub-grade to begin with. This point needs to be investigated also. Also, it appears almost most of the drivers are not even stopping at the two existing stop signs at the corner of the Browning/Beverly Glen/Simon Ranch at this time. Someone needs to study this corner for present and possible future developments.

Effect on property values due to this development

I believe this development will have a very negative effect on our property values. At this time, our neighborhood is a mixture of all custom homes each different from the other. A tract housing development will be out of place in this neighborhood. Our properties currently have different:

- Building size
- Building shape
- One story
- Different building layout
- Different lot shapes and the majority of half an acre property
- Different building material
- Etc.

At this time, it is already very difficult for the appraisers to price our property due to no cookie-cutter development, to establish property values at this time. However, when this development gets established, how could one compare our property to two-story condominium tract houses. The developer will benefit, and the neighboring property owners will suffer in every respect.

Besides, once the county approves this development, it establishes precedent for other property owners to subdivide their properties using SB-9 and SB-10 State laws to subdivide their properties and build higher densities in order to recover their damages.

Received from
George Youdeem
george@youdeem.com

Canning, Kevin

From: Jola <jolaprzywara1@aol.com>
Sent: Sunday, June 26, 2022 12:31 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Save The Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Planning Commission,
Mr. Kevin Canning,

I am writing to you to ask you to deny the proposed high density development of 37 residential condominium units in our community.

We purchased a home on Salt Air Dr. steps way from the Tustin Hills Racquet Club, because of the recreational possibilities at the Club. We wanted to live close to the club to stay fit and healthy. Our entire family are members of the club, play tennis 3 times a week, swim, use the gym and participate in social activities. The club creates the character of a family neighborhood, feeling of a community.

We understood that the club will be here for our grandchildren and great grand children, because of this specific zoning and the recorded CC&Rs for Tract 3883 that run with this parcel.

The developer also knew what he was buying - A family club that is a heart of this neighborhood, with specific zoning and CC&Rs.

its unthinkable that someone with money can take this jewel away from the community for huge profits at OUR EXPENSE.

Another issue is that the EIR is factually incorrect.

The proposed development would have a tremendous impact on the community safety. It would absolutely endangered lives of our playing children, walkers, bikers by creating more traffic on very narrow, dark and winding streets. Talking about narrow streets, Salt Air, Pavilions and Simon Ranch are very narrow, only ONE CAR can pass at the time. In case of an emergency (fire, earthquake is very possible in this area) there is only one narrow vehicular access for the entire community. With the narrow streets and NO SECONDARY ACCESS we will be trapped. I hope we all agree that HUMAN LIFE IS MORE IMPORTANT then profits for the developer.

This project is very unfair and endangers our lives - PLEASE DO NOT APPROVE IT!!!

Sincerely,
Jolanta Przywara
2272 Salt AIR DR

Canning, Kevin

From: Pei-wen Jessica Tan <bassoon821@hotmail.com>
Sent: Sunday, June 26, 2022 8:08 PM
To: Canning, Kevin; kirkwatilo@gmail.com
Subject: Save the Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

My daughter and I moved to the Lower Lemon Heights in the North Tustin area after living in Irvine for 20 years. We have experienced first hand what increased building and traffic did to our neighborhood in Northwood.

We have worked very hard our entire lives and saved so we could move to North Tustin and enjoy the decreased housing density and reduced traffic in our new neighborhood. We enjoy walking our dog on Simon Ranch, Salt Air, Browning and the surrounding streets.

In the last two years, we witnessed the increased Construction Traffic on Browning and Simon Ranch as the city of Tustin was building a new water tank on the corner of Valhalla Drive and Outlook Lane. There were many trucks on a daily basis traveling up Browning then Simon Ranch before turning left onto Valhalla Drive and then a short block to the corner of Outlook Lane. This location is one block from the THRC. If the Racquet Club redevelopment gets approved there will be far more construction trucks, cars, etc. for 2 to 3 years plus the added cars and trips from the high density development thereafter.

In addition, in case of a fire or earthquake (which are likely) a high density development would make it more dangerous for evacuation since there is only one narrow vehicular access point in and out of the community (Simon Ranch Road) and no sidewalks for pedestrian evacuation.

The EIR failed to take into consideration the compatibility issues relative to North Tustin's community and preserving its distinctive rural quality. If the zone gets changed to R2 (5000) the density will be 3 to 4 times of the surrounding community. We didn't move here to live in a high density area!

The THRC is the last remaining parcel in North Tustin zoned for recreational open space which is a recreational facility for North Tustin and all communities in the area. The THRC provides tennis, pickle ball, swimming, swimming lessons, physical fitness and personal training. If THRC leaves, then all the members and non-members will have to migrate and drive to other locations which will impact other community parks.

There is a recorded restrictive land use covenant for the THRC executed to preserve its use in perpetuity to solely benefit the community and not the tennis club or the developer. Do we really need a developer from the outside to destroy this recreational space at the community's expense?

Please do not allow this redevelopment to go forward which will destroy the character, charm and feel of North Tustin Hills.

Regards,

Nancy and Jessica Tan
12171 Browning Ave.
Santa Ana, Ca 92705

Canning, Kevin

From: NICOLE MORGAN <nicolepmorgan@me.com>
Sent: Sunday, June 26, 2022 11:30 PM
To: Canning, Kevin
Subject: SAVE Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Have a great day!
Nicole Morgan
714-290-4121

Canning, Kevin

From: susanadams412@yahoo.com
Sent: Sunday, June 26, 2022 4:07 PM
To: Canning, Kevin; kirkwatilo@gmail.com
Subject: EIR Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello. We live on Liane Lane and have for over 11 years. My husband has a severe traumatic brain injury and requires 24 hour care and cannot do anything for himself.

There are numerous families up here that would need extra time and support to leave in case of an emergency. The impact of adding the new housing development would critically impact our traffic flow.

The fire season has become tremendously extreme in the past few years with no signs of letting up any time soon, and evacuating this ridge would be very tough as there is only one way out. Ambulances and firetrucks need to be able to get up here in a hurry and it would be a nightmare.

We purchased our home because it was on a half acre and was quiet. If this project gets approved it will be very noisy, very dusty, very hectic with construction trucks (we just had that for over two years with the water improvement) and it will no doubt lower our home value.

Please do not change the integrity of this beautiful neighborhood. We stand by "Saving the Racquet Club".

Susan and Jim Adams

Canning, Kevin

From: Thomas Bulowski <thomasbulowski@yahoo.com>
Sent: Sunday, June 26, 2022 3:04 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Bulowski Family Response to the Draft Environmental Impact Report

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Mr Canning,

As home owners with one of the homes that directly back up to the Tustin Hills Racquet Club("THRC"), and located at the front gate entrance to the THRC, **we strongly oppose the rezoning and re-development plan of the THRC.**

When we first purchased our home 5 years ago, we directly spoke with the former club owner and he said that the THRC will always remain a club because of the longstanding Covenant. Our family was drawn to the beauty of the neighborhood with its majestic views of mountains and palm tree's, the large 1/2 acre lots with non identical looking homes, a safe, quiet and peaceful neighborhood with limited traffic flow. Unfortunately now all of the above points are in jeopardy with the city's consideration of rezoning to allow the construction of 37 high density non neighborhood conforming townhomes.

Our family is extremely concerned about the possible rezoning for several reasons...

1) the townhomes and their proposed 5,000 sq ft lot sizes are vastly smaller and not consistent with our typical 1/2 acre lot sizes and will negatively impact our current home values and views with new 25ft townhomes in our backyard.

2) the traffic impact with 37 new homes will be significant with increased noise, congestion and safety, especially given the large number of family's with children and the numerous residents that walk on a daily basis with their pets. Living near the front gate entrance, with the narrow gate entrance and only one way in/one way out, there is not enough room for 2 cars to safely pass each other, not to mention adequate space for first responders should a fire or other catastrophe arise, there is no other way to access this area.

3) regarding traffic impact, within the past 4 weeks, we had a speeding vehicle drive up and over our front landscaping, into a tree and thru our junipers, finally coming to a stop on our front lawn. We cannot imagine even more traffic coming up and down the hill with the narrow streets on a daily basis.

4) the beauty of the surrounding area that can be viewed from not only our home, but from all other homes and from all streets would be in jeopardy with the environmental impact with added pollution, not too mention the numerous species of birds that currently call the palm tree's home.

5) having our home located directly at the proposed community entrance, more and new street lights would shine directly into our bedroom windows, not to mention the added noise of traffic at all hours of the day, unlike the current club hours.

6) no one is obviously taking into consideration the immense construction noise, pollution, traffic delays that this will cause the families that live directly next to the THRC.

7) on numerous occasions we were told that these 37 townhomes were for affordable senior living, but why would seniors want to live in a 2 story home? Isn't that a bit of a contradiction? Wouldn't most seniors want to downsize to a single story home with perhaps easy local access to bus lines and shopping?

8) being one of the homes directly at the entrance to the THRC, the developer was going to work with us and allow our input, but as to date, we have never been contacted or given any updates from the developer. If the rezoning were to be approved, the development would be 4 times the density of the surrounding community.

Our area is such a precious and beautiful location and one that we are proud to call home and we want to keep it that way. As an adjacent neighbor to the THRC, we would be open to discussing possible alternatives with the new owner, but until that happens, we are opposed to the rezoning and ask that you do the same.

Sincerely,

Thomas and Tiffany Bulowski

2121 Valhalla Dr

949-525-2639

June 27, 2022

Mr. Kevin Canning
Contract Planner
OC Public Works
Development Services / Planning
Kevin.Canning@ocpw.ocgov.com

Dear Mr. Canning – I vehemently oppose approval of the Draft EIR on the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
- **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
- **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. The Club is also open for swimming lessons to the outside public. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site

(the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

- **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
- **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Abby Green

Abby Green
1031 Hyde Park Dr.
Santa Ana, CA 92705

Canning, Kevin

From: Alexander Taghva <alextaghva@gmail.com>
Sent: Monday, June 27, 2022 9:16 PM
To: Canning, Kevin
Subject: Tustin Hills Racquet Club EIR Issues and Impacts

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

June 28, 2022

Dear Mr. Canning:

I am writing to voice strong opposition to the redevelopment of the Tustin Hills Racquet Club to high density housing by Mr. Beauchamp and Mr. Zehnder. I am a long time resident of North Tustin, am married, and have three young daughters who use the tennis club recreationally.

Growing up, my daughters learned to swim at the club. We believe redeveloping this area to high density housing would permanently damage the character, future, and suitability for families of the neighborhood.

As you may already know, Mr. Beauchamp and Mr. Zehnder unsuccessfully attempted to redevelop Peninsula Point Racquet Club in the Balboa and Newport communities in a similar fashion roughly 10 years ago. While I am not entirely familiar with their process I suspect that they also were able to identify the insincerity of the claims and realized these are simply bad actors trying to turn a profit without regard for the damage to the surrounding communities. I would like to think that the North Tustin community will receive similar protection and consideration from our county officials, as did the Balboa and Newport communities. A detailed list of objections is as followed.

Under project objectives (Sect 1.5 and 3.3.) the developers claim that this project will address need for affordable downsizing properties for those in the area. The applicant neither conducted any community outreach or established focus groups to back this claim, likely because they are aware the community has overwhelming opposition to high density housing. Furthermore the projected high-end price point of the units (1.5 mm now with 60% appreciation), puts each unit in the

2 million dollar + range, which is completely incongruous with satisfying housing shortages for older residents. Furthermore, the safety of the community will be in jeopardy, as this development is projected to add nearly 100 new residents/drivers to a physical infrastructure not designed for high-density housing. There are no sidewalks, and the streets are windy and narrow, populated by children and pets going for walks. I suspect adding high density housing to this area will ultimately end in injuries to pedestrians and bicyclists and potentially motor related fatalities. As a practicing neurosurgeon at an orange county trauma center, I can tell you this threat is real. Furthermore, physical barricades provide limited access for fire, medical and other emergency services, therefore the surrounding land uses stipulation in sect 3.4.1 is misleading. In fact the proposed development represents a density 4 times the surrounding Red Hill Ridge community with only one ingress and egress point, no sidewalks and limited street lighting, the traffic generated by the proposed development is of utmost concern for the safety of the existing residents

To further complicate the safety issues, under project theme sect.

3.5, proposed driveway lengths are very short and cars will hang into driveways, and this will further complicate safety issues, as it will further narrow passageways in an area with winding roads and no sidewalks and frequent foot traffic from children. The addition of 100 extra cars is simply not built into the infrastructure of the community.

From a community recreational harm perspective (Sect 4.14), the club estimates 80-90% of tennis players are non-members. What this means is the redevelopment will eliminate a recreational park in north Tustin and lead to overflow

severely impacting surrounding parks. It is also a practice center for local high schools which would lead to loss of sport opportunities for our high school students or need for busing out of the area. In addition, THRC site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are located on residentially zoned land. The County of Orange itself sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. THRC (only zoned parkland) represents a minuscule 0.24 acres/1,000 residents ratio – a far cry from the County's own standards! So removing THRC would essentially take an already below County standard parkland standard and make it egregiously in violation of County standards.

From a legal and covenant standpoint, an upzoned high-density development is contrary to the Covenant. This recorded land-use covenant was executed to preserve its use into perpetuity for the express benefit of residents (not the tennis club owner or future developer). Therefore, the use of this property belongs to the residents (not the tennis club owner or County). Both the former owner and Seller and Developer (Buyer) acquired the land with knowledge of this restrictive covenant solely benefitting the community, which is reflected in the price paid by the Developer.

Regarding environmental impact, this area receives multiple evacuation notices EVERY YEAR for local fires. Development of this open space eliminates a much-needed staging area for fire and first responders in the event of a fire or another catastrophic event.

Again, the roadway/access infrastructure of this community was designed in the 1960s for very low-density housing. The infrastructure was never designed to accommodate high-density housing as evidenced by the narrow streets, lack of sidewalks, and lack of secondary access in/out of Red Hill Ridge. The report does not address the physical limitations of the existing infrastructure and the fact that it will NEVER HAVE SECONDARY ACCESS. Redevelopment is a mass casualty disaster waiting to happen. EIR does NOT adequately address the serious evacuation concerns in the event of a catastrophic event (fire, earthquake, etc). It merely states the Project site is not located within or near a Very High Fire Hazard Severity Zone, yet it IS located 3/4 mile from a Very High Fire Hazard Severity Zone (Peters Canyon).

EIR surveyed the project site on ONE DAY (March 30, 2021) to determine the existing wildlife and grossly understated inhabitants (e.g., lizards and rats). The community is inhabited by many more species, namely bobcats, raccoons, coyotes, owls, hawks, falcons, migratory birds (swallows and parrots), rabbits, mice, and gophers, snakes, and beehives. The proposed development will surely disrupt, displace, and potentially destroy this wildlife.

In summary, it is the assertion of myself and many others in the community that the potential for harm to the community has been minimized and misrepresented, likely intentionally, by the developers who are seeking to make a quick profit, while damaging a community and potentially leading to injuries and deaths in a community not intended for high density housing. These developers are trying again what was an unsuccessful attempt to destroy another Orange County community. I hope our county officials will make the right choice and place their residents concerns over the greed of a couple individuals.

Sincerely,
Alexander Taghva, MD

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Alexander Taghva, MD
Orange County Neurosurgical Associates

June 27, 2022

Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
601 North Ross Street
Santa Ana, California 92701
Phone: (714) 667-8847
kevin.canning@ocpw.ocgov.com

Re: Ranch Hills Planned Development Draft EIR
Planning Application No. PA-18-0034

Dear Sir:

As a resident of 1912 Beverly Glen Drive, the connector between Skyline and Browning/Simon Ranch Road, I consider myself and my family to be well within the impact zone of the proposed Ranch Hills project, aka, the redevelopment of the Tustin Hills Racket Club. Therefore, I submit the following responses to the Draft EIR for the public record.

First a bit of context, to perhaps allow you to better assess my comments that follow. As I have a PhD in History from the University of Southern California, as a result of years of study, I am not a stranger to dealing with multitudes of data and metrics....and as a consequence, have learned that much of what generally is provided (and even accepted) as “data” is often incomplete, inaccurate, wrong or misinterpreted. Occasionally, public and private data can be accurate, but even then, a failure to use common sense too often leads to erroneous conclusions. Data without context is often meaningless. Secondly, I have 37 years of professional experience in the field of commercial retail real estate development, working as a consultant for developers, retailers and investors. If you suspect that I have read more than a few EIR reports in that time frame, you would be correct in that conclusion. While residential development is a different asset class, there are some basic fundamentals that are in common....EIRs being one of those commonalities. I do not consider this EIR to be very good although superficially it meets public requirements.

Before I launch into some points of concern about the Psomas study on the Ranch Hills project, as a general comment, it strikes me that overall, one of three things applies to this EIR study. From my perspective, the client did not provide a sufficient budget for this EIR, which resulted in the “cutting of corners” and quick judgments by Psomas in quite a few areas where there is very little, and often no, solid supporting documentary evidence. In this scenario, the contracted company did the best that they could, within the available budget and time frames. It would, however, also be possible to be much less charitable, and come away with a conclusion that the authors were either lazy, and/or failed to perform sufficient due diligence, or they were just sloppy.....or even a bit of both.

I have two areas that I wish to focus on in the interest of your time. Unfortunately, by the time that I got to these areas, there were too many irritating previous statements in the document that were not what could be called “confidence-building statements”. It seems that perhaps that there was too much pressure either to produce negative declarations (“no impact” or “no significant impact”), or a willingness to accept at face value the data provided by third parties, without much (or any) due diligence being performed as to the value of a particular metric. A case in point is the discussion of Mineral Resources. The State of California considers the area to be an MRZ-3 (“an area containing known mineral occurrences of undetermined mineral significance”(CGS 2021). This finding apparently conflicts with the County of Orange General Plan, Resources Element...which identifies “no mineral resources, petroleum resources or geothermal resources have been identified”. Maybe, maybe not, but the absence of evidence is not the same thing as the evidence of absence. The nearby Red Hill is an old volcanic feature. Since it is no longer active, the vent has probably moved on, However, there was mining in and under Red Hill at one time. Was there any extensive geo-technical testing done at the Racket Club in this regard? Or is this “no impact” just a convenient quick guess? The dismissal of the idea that there are any mineral resources seems to this reader to be a little too quick and glib by Psomas, and is based on the County data, which itself does not appear to be very thorough. There was no attempt to reconcile it with the State data. Was any extensive geo-technical testing or surveying performed on the site? The EIR also notes that the nearest oil well is Chevron No. 5-1, on Tustin Ranch Road....only 1,500 feet distant from the property. Really? The EIR couldn’t even ascertain whether this well is definitely plugged or abandoned. Why not, its a “yes” or “no” option? It would be unusual for there to be only oil in one small area, only 1,500 feet away. So is there no other oil below the surface? Or “no one knows”? It is these leaps of faith that this document constantly makes, that over the course of 370 pages, continually undermine the reader’s faith in any of the documents various conclusions. There is rather too much bad logic, or no logic, and too much missing common sense.

Another example comes in the Archaeological Resources. “The SCCIC records search identified (only) 22 prior cultural resources technical studies within ½ mile of the Project site (SCCIC 2017)”. This is followed up by the statement that “The regional overview studies are a testament to the archaeological sensitivity of the region surrounding the project area.” It seems that the authors of the EIR then rather easily dismissed these comments by noting that since none of the 22 studies actually occurred on the property in question, the issue was therefore closed, and there was “no significant impact.” There might well be no relics on the site, and a variety of monitoring measures have been proposed, but this reader is again dismayed by the lack of logic in the argument. Skyline was once an old Indian trail, there are a lot of possibilities throughout the area. The construction of tennis courts did not involve a lot of site preparation and soil excavation. Again, the absence of evidence is not the same as the evidence of absence. In fact, the few comments that are made could equally well be used to argue to more extensive investigation is necessary.

We could introduce more of these poorly constructed conclusion from the document, but we will move on to what we consider to be the insurmountable obstacles that can not be mitigated in any manner, shape or form in a project of 37 additional housing units. These two points just

mentioned are possibly minor issues, but they nonetheless are “speed bumps” within the document. When the reader gets to more substantive areas like traffic and Fire Safety, his confidence in the EIR is not strong.

Let’s address traffic (Section 4.15 of the EIR).

Since we live on Beverly Glen and have been there 22 years, two salient characteristics, in our opinion, describe this street (which is little discussed in the EIR, its almost like Beverly Glen does not exist). First, many people, both residents and those passing through, seem to think that this street is some kind of motor speedway, whereby they can test out how quickly their vehicles can accelerate from the stop sign on Browning, or on Skyline, to the other corner. As a result, residents can constantly listen to the peeling of rubber on the asphalt and the squealing of breaking tires. Adding more residential density in the immediate vicinity is going to make this existing situation worse in terms of public safety....as Beverly Glen is, along with Browning, one of only two ways to access the Racket Club property from the rest of the County. The daily vehicle trips schedule proposed by the EIR belong to some pre-on-line shopping/Amazon era that is now ancient history. The current Racket Club does not get that many daily Amazon, Fed Ex, UPS, Uber Eats, Grub Hub or Door Dash or other delivery service visits per day...but there are more than a few houses in this surrounding area that get multiple deliveries per day. We know this because we live on this street and can experience this situation, daily. The number or delivery vehicles has been increasingly steadily and took a really big jump during the Covid pandemic. Customers have been retrained, there is no going back to the old normal. There is one house on Beverly Glen that consistently receives a half dozen deliveries per day, and sometimes this number reaches double digits. So.....how many delivery trips per day will 37 additional housing units generate? The answer is not going to be a small number. Without more analysis, it is difficult to say, but we are not being paid to conduct the actual research, the burden is on the developer to “show” that the development will not make things substantially worse. Common sense (not much of that in this EIR) and observed experience would suggest that this could be a very big number. To say that many delivery van drivers are in a hurry to deliver packages would also be an understatement. Vehicles unloading on the northern side of the street easily bring vehicles to a stop if there is on-coming traffic. As residents, we note that there are a lot of apparently “transit” trips happening.....vehicles coming up Skyline from Red Hill Road come across Beverly Glen and then turn right onto Browning (rather than turning left as might be expected, onto Simon Ranch Road).

Second, there are no sidewalks along Beverly Glen. Nonetheless, the two-lane road (no median) attracts a lot of pedestrians, joggers, people walking their dogs and bicyclists. Since everyone shares the same roadway, this is already a dangerous public safety hazard (see comments about speeding vehicles, above). More vehicular traffic is not likely to improve the situation. There is a semi-partial shoulder on the southern side of Beverly Glen, but the easement belongs to the County and is minimally maintained. Adjacent homeowners maintain the easement across their frontage, to varying standards, but the surface is in general unstable. County policies, liability insurance requirements and fee structures as to encroachments on the easement effective disincentive homeowners from making any improvements at their own cost across or along the

easement. Therefore for the foreseeable future, most pedestrians will use the paved street surface as their sidewalk. There is only one streetlight between Skyline and Browning, the situation is especially dangerous at dusk and at night. Adding more residential density at the end of the Simon Ranch cul de sac is not going to improve this situation.

Finally, in our opinion, there is one humongous issue.....fire safety and fire security (see Section 4.18 of the EIR). All of North Tustin, including the Racket Club, is located in a highly dangerous area, for several reasons. First, North Tustin is located very close to the Cleveland National Forest and Irvine Regional Park, both of which are fire prone because of the extensive dried vegetation. Second, the topography of this part of Orange County is characterized by a good number of ridges, hills and canyons which serve to funnel Santa Ana winds and any fires that start, quickly over the hills and down the canyons towards residential areas. High intensity winds and wind gusts can carry embers considerable distances (many miles) within a matter of minutes. We have been showered with ash ferom fires in Anaheim Hills and Yorba Linda. Third, the majority of residents have planted all the wrong kinds of trees....North Tustin and in particular Red Hill Ridge, is filled with old eucalyptus trees, a variety of palm trees, many pine trees and juniper....all of which are very flammable and burn very quickly. This situation makes it something of an academic question as to whether a particular address is in a fire hazard, high fire hazard or very high fire hazard zone. The entire area is dangerous, its “splitting hairs” bureaucratically to suggest that only if you live inside the boundaries of a very high hazard zone, is it dangerous. Its also immaterial if a property is a half mile or a mile away from a “very high fire hazard zone”. The reality is that embers can cover the distance in a few seconds, under the right wind conditions. This makes a dense residential project as has been proposed at the Racket Club, a very high-risk situation, given that there is only one road (Simon Ranch) into and out of the property. There is only one driveway connecting to Simon Ranch Road. That means that residents fleeing a fire must use the same narrow winding two-lane road as the arriving fire equipment. Residents evacuating from This is a recipe for disaster. Based on the EIR information, the materials to be used for house construction are not going to result in fire proof homes, and the suggested landscaping, mentioned in the EIR, while perhaps aesthetically pleasing, is not going to retard any fires. A dense residential development in this “bowl” or “glen” is a disaster waiting to happen. And such an event will impact those of us who live further down the hill, not just those residents who live on former Racket Club land.

Simon Ranch Road is the only way out for residents of Salt Air, Pavilion, Liane, Lerner, Valhalla and Outlook. During various and sundry fires of the last two decades, the voluntary evacuations for this area have produced vehicular chaos on Browning, with long lines of backed up vehicles waiting to flee the area. Its easy for researchers sitting in comfortable office buildings and writing EIRs to look at this with disdain and suggest that there is “no impact”, but those of us who actually live here have a very different memory and a very different perspective. When we moved into our house, one of the things that came to light during inspection were all the various burn marks and patched holes caused by fire damage, on the existing wood shake roof (since replaced with galvanized steel). During several of the nearby fires of the last two decades, our house and front and back yards have been showered with ash, to the point where at times it was difficult to see the green grass or the driveway. Beverly Glen is only two lanes wide, and it offers

escapees from fire only the options of going north on Skyline towards Foothill (a narrow and winding route) or going south on Skyline, and navigating six sharp curves where the posted speed limit is 15 miles per hour. The capacity to serve as a fast and efficient escape route is limited because of a number of side streets that have access in or out only by way of Skyline.

I was definitely surprised to see such a minimalistic analysis the wildfire situation. A brief glance at history will show that fire is a persistent and long-standing issue in the area. Yet there is no listing or analysis of any of the previous firestorms (its a long list) that have occurred in the vicinity. When the fierce Santa Ana winds blow, as they do annually, we who are residents are downwind, and therefore in the path of fires coming down any of several canyons south if the I-91.

Maybe going back to the 1889 Santiago Canyon Fire is too long ago, but to take a look more recently, the 1967 Paseo Grande fire burned several dozen single family homes (some estimates reached as many as 66) in Lemon Heights and Cowan Heights. This fire, as have many, started in Riverside County.¹ Using the kind of illogic to be found frequently in this EIR, one can only assume that this would be a “no impact” event because it would be “too far” away. The entire Wildfire section of the EIR seems very dismissive of the topic, and assumes that what issues that there are can easily and simply be mitigated so that there is no significant impact. As residents who live here, we beg to differ. Do we seem sensitive to this issue?....yes! If you have packed your cars several times with possessions and been prepared to evacuate, or spent time watering vegetation and the exterior of the house, prepared hoses and water barrels (and nervously eyed the County-owned four aging and decrepit, super flammable eucalyptus trees growing on the County’s Beverly Glen easement), then you don’t soon forget these experiences.

The list of fires that have threatened this area is long², there have been fires every decade since the 1920s. More recently, there were serious challenges in the 2007 Santiago fire, the 2008 Freeway Complex fire, the 2017 Canyon 2 (Peter’s Canyon) fire, and the 2020 Bond and Silverado fires....to mention just a few. The 2018 Holy fire in Riverside County and the Cleveland National Forest ultimately went in another direction in Orange County, although it was not immediately evident what path it would follow due to shifting winds.³ The Canyon 2 fire threatened much of the area around the Racket Club, and voluntary evacuation suggestions resulted in some residents temporarily leaving.⁴ Of special note would be the very serious Oct.

¹ <https://www.latimes.com/archives/la-xpm-1987-11-06-li-12861-story.html> and [.https://www.latimes.com/archives/la-xpm-1992-10-29-me-1041-story.html](https://www.latimes.com/archives/la-xpm-1992-10-29-me-1041-story.html).

² <https://www.ocregister.com/2007/05/17/significant-fires-in-orange-county/>.

³ <https://www.latimes.com/local/lanow/la-me-holy-fire-20180810-story.html>.

⁴ [https://ktla.com/news/local-news/canyon-fire-2-homes-destroyed-as-thousands-re main-evacuated-in-anaheim-orange-and-tustin/](https://ktla.com/news/local-news/canyon-fire-2-homes-destroyed-as-thousands-re-main-evacuated-in-anaheim-orange-and-tustin/). There was an earlier fire in the

22, 1996 Afton Lane fire. This particular fire saw ten single family homes destroyed and another 16 damaged, along Afton and Skyway, just north of Skyline. Fire equipment was lined up along Skyline, and Beverly Glen was used as a staging area. Every house along Beverly Glen was showered with ash. Residents were on stand by to evacuate.⁵

Somewhat to the west, but because it was located in near Rocking Horse Ridge, on higher ground, and because winds can suddenly drive a fire in new directions, was the 2020 Sunrise Lane fire should also be considered as representative of the constant threats to North Tustin from fire.⁶ Building more homes and higher densities will not make this problem go away.

The Racket Club is mostly open space, it ought to be preserved as a fire brake and a staging area for firefighters. Tennis courts and pickle ball courts for not offer much to burn. If there is an urgency to add housing to Orange County, there are still underutilized properties and undeveloped properties available, there is no need to raise the fire hazard risk by increasing urban density in a place with such poor access. Residents in the Ranch Hills project will be living in a veritable death trap. It is not at all unreasonable to suggest that the County can look forward to a lot of lawsuits following a fire(s) on the property of the Racket Club, should the land be redeveloped as proposed.

Sincerely,

Andrew Strenk, PhD
1912 Beverly Glen Drive, North Tustin 92705
a.stre@live.com

same year near the Anaheim-Corona border, in late September. This was became identified as the Canyon Fire, leading to the designation of the second fire that began in the same general area as Canyon Fire 2. The second one was far more destructive, destroying 25 structures and damaging another 55 structures.

⁵ <https://www.latimes.com/archives/la-xpm-1996-10-22-mn-56652-story.html>.

⁶ <https://www.cbsnews.com/losangeles/news/tustin-third-alarm-fire-million-dollar-estate/>

Canning, Kevin

From: April O'Dell Nugent <april@theodellgroup.com>
Sent: Monday, June 27, 2022 1:14 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Mr Canning,

Thank you for taking the time to read this. I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be really devastating to the North Tustin community.

I was born and raised here in North Tustin. I am also a top producing Realtor specializing in North Tustin. My family's business, The O'Dell Group of Seven Gables Real Estate, has been representing buyers and sellers in North Tustin since the 1980's. Hands down this area is known and valued for it's large lot sizes and custom homes. Our neighborhoods are spread out and The Racquet Club has always been an added bonus not only for families to enjoy tennis and swimming, but also for residents in general who appreciate the quality and connectedness that the club offers to our special community.

After living back east for several years after college, my husband and I moved back to North Tustin with our

children to plant roots and raise our family here in the same special community I was raised. We live on Racquet Hill. And we specifically choose our location BECAUSE of the zoning and knowing that we would be protected versus other areas that would allow for more dense development. The Racquet Club was purchased as recreationally zoned and therefore should stay that way – we are members of the Racquet Club and pay a healthy amount and from my knowledge it appears there are many others like us – I have a hard time believing that this facility that was bought under recreational zoning is not doing just fine financially. The overhead appears minimal and especially with the upgrades to pickleball courts the membership seems strong. For the County and our elected officials to change the zoning is one thing that should not be allowed but to change it and allow high density housing with 37 units is downright preposterous.

I have significant fire and Life Safety concerns for the traffic on these smaller windy roads and strong concerns about the resources required for police and firefighters in the event of an emergency. In addition the wildlife is real -my children have grown to love the owls and wild parrots we hear daily. We have seen coyotes and bats and bobcats frequently.

I sincerely hope the County does the right thing by leaving the zoning in place.

Thank you for your consideration.

April O'Dell Nugent

The O'Dell Group | Seven Gables Real Estate®
12651 Newport Ave | Tustin, CA 92780
C:949.423.9497 O: 714.665.7109 | F: 714.505.2833 www.theodellgroup.com

Canning, Kevin

From: Blair Hoppe <BHoppe@waypointpg.com>
Sent: Monday, June 27, 2022 9:25 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Save the Tustin Hills Racquet Club

Importance: High

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

My kids learned to ride bikes in the THRC parking lot. My kids learned how to play tennis at THRC. My kids learned to swim at THRC. My kids love walking down the street to get a snack from THRC. I have loved watching my family grow up at THRC. Personally, I grew up living at Tracy and David Beauchamp's Chino Cove house in Newport Beach with their son, Brady, I know them well. We are good friends. They are very nice people, philanthropic, and caring but they don't "need" this development. It will not change their lifestyle one single bit. There is a reason why we moved to Racquet Hill, and that reason was not to live next to condos/PUD housing.

I am writing to respond to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to **ANY** zoning changes at the Tustin Hills Racquet Club ("THRC") property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County and more particularly the Racquet Hill neighborhood. The THRC offers numerous, valuable services to its members, our family, as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats, and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Blair Hoppe
11632 Vista Mar

Blair R. Hoppe
Waypoint Property Group

567 San Nicolas Drive, Suite 270
Newport Beach, CA 92660
(949) 200-6732 (direct)
(949) 375-5002 (mobile)
bhoppe@waypointpg.com



Bob and Susan Roice
12121 SE Skyline Dr.
Santa Ana, CA. 92705

June 27, 2022

OC Public Works, Development Services/Planning
601 North Ross Street
Santa Ana, CA 92701
Attn: Kevin Canning

Project: Ranch Hills Community File No. 18-0034

Dear Mr. Canning:

We have lived on Skyline Drive in North Tustin for over 40 years. We moved into this neighborhood because of its beauty, peacefulness and the opportunity it provided for our children to grow up in the safety of a small town community.

We wrote to you several years ago when the proposal was first submitted. Now we find that once again this project is being reviewed with the intent to replace the Racquet Club with an over-large residential development. We continue to urge that the proposed development (Ranch Hills Planned Development (PA180034 / VTTM 18119)) be rejected. We base our concerns upon the following:

It is our understanding that the proposed Ranch Hills Project will tear out the historic Tustin Hills Racquet Club and replace it with 37 high density, low value condos. These condos will be squeezed into the space previously containing 11 tennis courts, a pool and a Clubhouse and parking lot. There is only one access road into this area and no possibility of creating another entryway or exit as the land is completely surrounded by single family homes. The entry point into this area is the intersection of Simon Ranch Road and Pavilion Dr. This is one of the most dangerous intersections because it is at the top of a rise coming from both north and south directions, has no stop sign, and is unlighted.

In addition to the congested and dangerous traffic situation, the roads in this area are woefully inadequate for evacuation should there be a fire. This problem was noted in the Laguna Beach fire several years ago where fire equipment was limited by congestion as was the evacuation of the residents.

The Project is located in a very rural area. There are no businesses so everyone in the neighborhood has to drive to work, school, grocery store, etc. At a minimum, assuming that each condo only has one licensed driver, you will have at least 37 vehicles leaving in the morning and returning at night. More realistically, many, if not all, will have

multiple drivers coming and going throughout the day. These condos are low value and will attract young couples and families where both adults will need to work. Thus, instead of 37 vehicles, there will be twice that number. This is significantly more traffic on a daily basis than a few weekend tennis matches and the occasional wedding banquet. The roads in North Tustin are narrow, winding, and unlit with many blind curves. There are no sidewalks for pedestrians. It is dangerous for joggers, dog walkers, bicyclists and parents with strollers to safely navigate the streets, especially Skyline, Beverly Glen, Pavilion and Simon Ranch Road.

This area of North Tustin has always been zoned for Single Family Residences. Lots are large and homes are expensive. Our home, like many others, is located on a large parcel of land. The length of our property is the same as a football field. We are by no means unique in size. This new project would squeeze several condos into this space, thus changing the very nature of our community. It will affect home values, the peacefulness of our community and the safety of our neighborhood. This project makes no sense, other than to create income for a developer, and we asked that you deny the request to re-zone this peaceful community that we have lived in for over 40 years.

Sincerely,

Bob and Susan Roice

Canning, Kevin

From: Chris Kramer <ckramer@acuityadvisors.com>
Sent: Monday, June 27, 2022 10:12 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning: as a 15 year resident of north Tustin, and member of the racquet club for the last 5, I am writing you to express my strong opposition to the proposed development of the racquet club. This high density plan is **TOTALLY** at odds with the surrounding uses, and will not only destroy the character of not only the immediate neighborhood, but will negatively impact the surrounding community in countless ways. It is ill conceived, short sighted at best, and should not be approved. Please do everything in your power to see that this bad idea and attempted end run does not get any more traction.

Thank you.

Regards,



Chris Kramer, CFA, ASA | Managing Director

O 714-380-3300 C 562-896-0796

ckramer@acuityadvisors.com | acuityadvisors.com

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Canning, Kevin

From: Chris McCormack <ctm665@gmail.com>
Sent: Monday, June 27, 2022 6:49 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Response to Ranch Hills Planned Development Draft Environmental Impact Report (EIR)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Kevin Canning
Contract Planner, OC Public Works, Development Services/Planning

Mr. Canning,

Thank you for the opportunity to respond to the Ranch Hills Planned Development Draft Environmental Impact Report (EIR).

I am an adjacent neighbor on the Racquet Hill side of the planned development.

I am **adamantly opposed** to the Ranch Hills Planned Development.

Let me share my biggest concern... The developer states that the County does not have the authority to disapprove of his planned development... I believe he is wrong. SB 330 advocates for the development of affordable housing that benefits the lower three of four income categories. In fact, it only mentions those three lower income categories - i.e. SB 330 only mentions very low, low, and moderate-income. SB 330, as I read it, does not advocate for incomes above \$123,600 (= 120% AMI = 120% of \$103,000). The Ranch Hills Planned Development is clearly targeting buyers with incomes beyond \$123,600. I believe this developer cannot invoke SB 330 to sidestep the County... My biggest concern is that the County believes he can...

On 6/4/2020 I sent an email opposing the planned development. In it I shared what the tennis club means to my family and to my community. I really hope I'm not wasting our time...

...expressing my frustration that we're not saying goodbye to a vacant lot or an obsolete facility or a dilapidated building. No, we're bulldozing a beloved recreational and social gathering spot that the EIR itself states is "economically, logistically, and politically feasible."

...defending the livelihood of the dozen or so people that derive their income from the club.

...sharing my irritation that current zoning is ignored, the will of the community is ignored, a covenant between 118 neighbors and the club owner is ignored, ...

...complaining about the disruption of 2 1/2 years of 6-day-a-week construction... noise, traffic, dust, debris,...

...lamenting the property value impact of blocking my valley view with a wall of housing at four times the density and two times the height of my own tract.

...witnessing a developer wield State housing affordability legislation to profit from housing that is not affordable.

...quoting the would be destroyer of our tennis club, the planned development's investor, expressing his gratitude for the tennis club of his youth, the Peninsula Point Racquet Club (PPRC)... "That little club was a major element of my personal development." - David Beauchamp, Compass Newsletter, Summer 2011

...articulating how this crown jewel of Lemon Heights - where countless members and far more non-members have taken a tennis lesson, have attended a Pilates class, have taught their child to swim, have raised money for a local

charity, have recited their wedding vows, have gathered for a BBQ, have made a new friend, ... how this social and recreational treasure... will be sorely missed.

.....
In the text that follows, I focus on my concerns with regard to the EIR, some of which involve the safety of my family...

*(Requests for information or change are **bolded** in print below.)*

In section 3.5, the EIR presents front elevations for the planned development. The adjacent parcels will only see the backs and sides of these townhomes/condos.

Request: I would like the EIR to include back and side elevations including decks and patios if present.

Request: I would like to know if the units have outdoor features like decks, patios, fire pits, pizza ovens, water fountains/features, etc... specifically, in the back yards or side yards?

Also in this section, I'm surprised that the developer is leaving the adjacent parcel fences in place. It just doesn't seem logical that we all put our fences right on the property line.

Request: During construction, will County inspectors ensure that my property line is respected?

In section 4.10.2, the EIR references the total RHNA allocation for Orange County (i.e. 10,406). Intentional or not, the implication is that unincorporated Orange County needs 10,406 of the kind of units that this planned development is providing. We know that this is not the case since the lion-share of the housing shortage exists in the lower income categories - i.e. affordable housing.

Unincorporated Orange County's total RHNA allocation (10,496) is broken out into four income categories: Very Low (3,139), Low(1,866), Moderate(2,040) and Above Moderate(3,361). A buyer within this planned development is in the Above Moderate income category (i.e their Income > \$123,600). In addition, only a fraction of that category would both be interested in a townhome/condo and qualify to purchase one.

<https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2>

Request: Since the developer's stated objective (OBJ-1) is to address Orange County's housing shortage, he should use the RHNA Income Category allocation number that represents his target buyers. And, he should use only the percent of that income category that represents his target buyers - e.g. % of Above Moderate = % of 3,361 = ? (This request is especially important since I don't believe that his RHNA income category is advocated for in SB 330).

In section 4.15, The traffic count section in the EIR is suspect for two reasons...

With regard to the current club traffic count... The EIR asserts that the first driveway traffic count (Thursday, April 15, 2021) was an undercount due to the impact of COVID-19. This was one year after the initial COVID-19 lock down and people were flocking to outdoor venues like the Racquet Club. Those courts were very busy when comparing to year-over-year. Also, masked customers (like my wife) were attending Pilates at that time as well. It is more likely that the 349 trips recorded was more than normal (and not less).

With regard to the planned development's impact on traffic... I find it highly suspect that the developer changed the trips methodology since his first analysis. This time, he estimates that the 34 common-wall units will result in 22% fewer trips than the 3 detached units even-though they are the same size and configuration. The developer would have you believe that, all other things equal, a common wall makes makes households drive less. While I believe his original trip count of 349 was low, it's closer to the truth.

Request: The EIR should use the original trip count for the planned development and conclude that the planned development does not reduce traffic.

In section 4.3.3, the EIR describes wildlife found in the area but misses a few.

Request: Perhaps the following wildlife should also be included: Birds: owls, parrots, egrets and cranes. Mammals: foxes, raccoons, gophers, squirrels and bunnies.

In section 4.10.3, the EIR warns that an established community should not be physically divided.

Several times over the years, I have used the pedestrian path (between Racquet Hill and the club) as a potential escape route while under voluntary fire evacuation. In fact, I've parked a spare car at the club so that my family (including my now 87 year old mother-in-law who lives with us) would have two ways to escape our cul-de-sac by car.

Request: This planned development alters my evacuation plan by removing one of my (vehicle) escape routes. If a fire is at the top of Racquet Hill then I could make the same argument for anyone living on Racquet Hill, Las Luces, Vista Privada, Ranch Hill and Vista Mar.

In addition, most of us neighborhood walkers and dog owners use the club pedestrian walkway to avoid walking on Skyline. Skyline is particularly nerve racking for walkers because 1) it's busy, 2) it's narrow, 3) curvy, 4) it forces 90 degree turns through intersections without a stop sign (at Beverly Glen and at Racquet Hill) and 5) there are no sidewalks.

The pedestrian path is used quite a bit. Its regular use is likely a reason the original traffic study of the club was a disappointment for the developer... because many people walk to the club or drop kids off at the pedestrian path on Racquet Hill. In fact, it's used so much that my wife and I installed low voltage lighting in the pedestrian path for those walking home after evening tennis or social events.

Request: How is our community not being physically dividing here?In section 4.18.a, the EIR states that the planned development is 0.75mi away from the nearest Very High Fire Hazard Severity Zone (VHFHSZ). I believe the planned development is about 0.45mi away from the nearest VHFHSZ. See the annotated screenshot from Cal Fire's website below.



Request: I'd like the EIR to indicate how the distance to the VHFHSZ boundary is measured and correct it if it is inaccurate?

In section 4.18.b, the EIR again warns about being near a Very High Fire Hazard Severity Zone (VHFHSZ). I challenge the EIR declaration of No Impact.

In the 22 years that I've lived on Racquet Hill, there have been several fires in the nearest VHFHSZ (pictured above). Inevitably, Santa Ana winds blow the ash over and sometimes on my house. I assert, that because of Santa Ana winds, the proposed development is "near" enough to the VHFHSZ to be subject to wildfire pollution and, because of the location of the VHFHSZ, the direction of the Santa Ana winds, and the drought stricken vegetation in the hills surrounding the planned development, the planned development is vulnerable to wildfire spread via airborne embers.

Furthermore...

- I have been dropped by two property insurance companies in the last several years because (they said) my house was IN a high fire risk area.
- My parcel has been IN or very NEAR many wildfire evacuation zones over the years.
- I am NEAR enough to Peter's Canyon to be well inside of the turning radius of the air tankers that fight the fires there (including the enormous DC 10 Air Tanker called-in last time).

Request: If available, I'd like the EIR to state the (or at least their) definition of "near" when declaring that the planned development is not "in or near a VHFHSZ".

In section 5.2.2, the EIR lists two alternatives to the planned development; No Project Alternative and Alternative 1 - Increased Setback Alternative.

No Project Alternative

The EIR effectively rejects this alternative with the assertion that "the County has determined that the No Project Alternative would not be legally feasible due to the requirements of Senate Bill 330 (SB 330)."

SB 330 does not force a property owner into development... high density or otherwise.

In fact, SB 330 advocates for the development of housing that benefits the lower three (of four) income categories (i.e. for very low, low, and moderate-income but not above-moderate). The moderate-income category tops out at \$123,600 (= 120% AMI = 120% of \$103,000). The Ranch Hills Planned Development is targeting incomes beyond \$123,600. I believe this developer cannot invoke SB 330 or HAA to sidestep the County.

Request: I would like the County to indicate if SB 330 is influencing their behavior / decisions with regard to the planned development. If so, why?

Request: I would like the County to be able to do their job as they see fit.

Also, the developer states that this alternative doesn't meet his objectives. Let's be honest... His objective is to maximize profit. Our objective is to encourage and support only the change that improves our community.

But of course the No Project Alternative is the best alternative... because you can't use less electricity, gas, water, ... produce less trash, sewage, ... by replacing a 10,000 square foot tennis club house, with grounds comprised almost entirely of hardscape, closed overnight and lightly used most of the day... with a neighborhood of 37 units, at 2,500 square feet each, occupied 24/7 by 37 families... even if you use the latest efficiency standards. You also don't lower traffic count by adding 42 spaces in parking capacity (125 today -> 169 in planned development), 37 Amazon delivery destinations, ...

Our community, environment, utilities, resources, transportation services, public safety agencies, ... are all worse off if this planned development is approved. Please don't be fooled by the developer's spin on cherry picked data within the EIR

Request: I'd like the developer to pursue the No Project Alternative.

Alternative 1 - Increased Setback Alternative

I don't see mention of the average setback for adjacent residential parcels in EIR. I could do some math however I can't be sure the developer is including all adjacent parcels in his calculation. Also, given that it is an average, some of the adjacent parcels might be worse off with this alternative.

Request: I'd like the EIR to include a Conceptual Site Plan for Alternative 1 - Increased Setback Alternative?

In no particular Section, I have general concerns...

Drainage Ditch Running Behind Adjacent Parcels

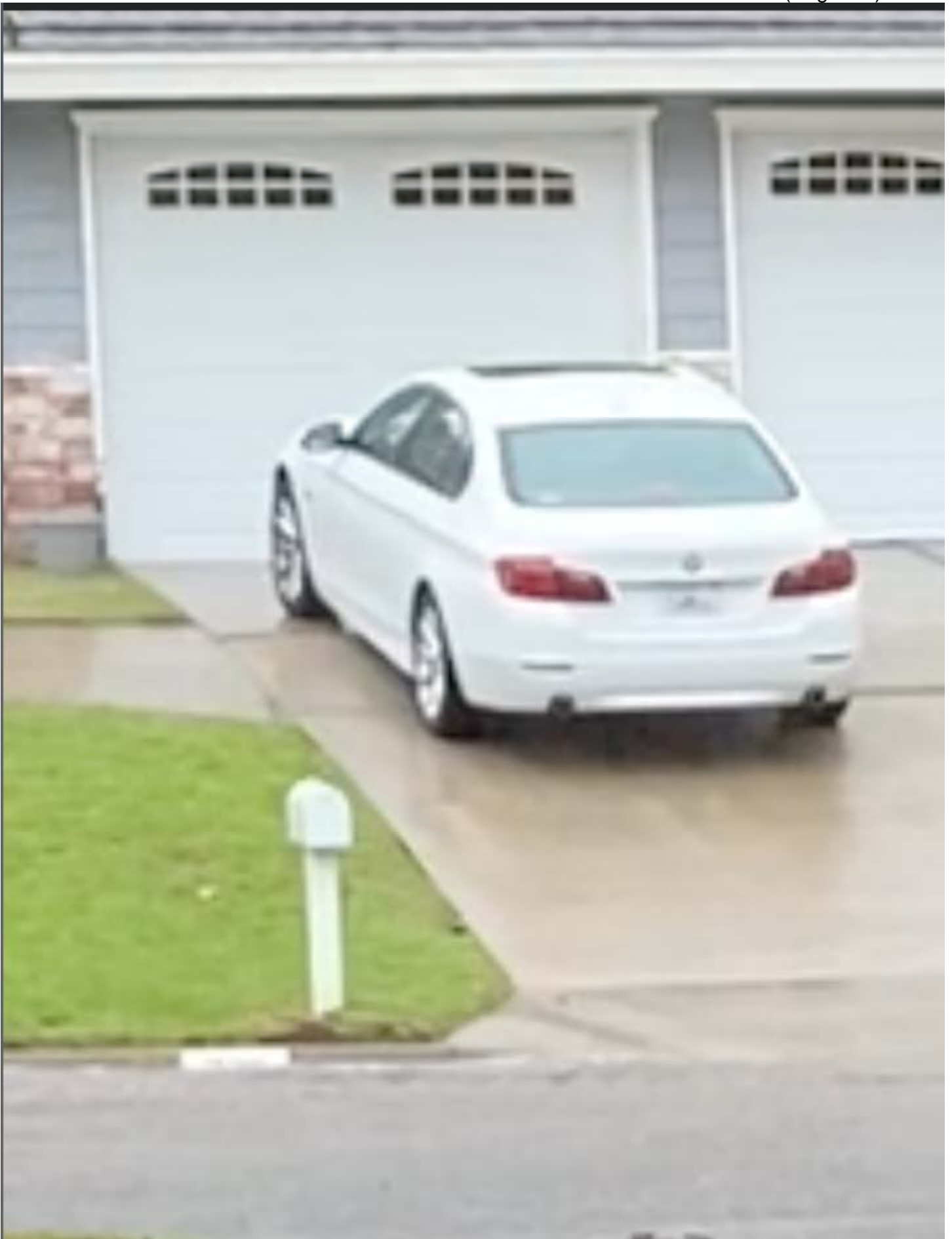
When I moved into my house, my neighbor warned me to keep the drainage ditch between my house and the tennis club free of debris. He said that I would be responsible if debris within caused runoff onto the tennis courts.

My concern with the planned development is that this it will increase my liability given that an overflow of the drainage ditch would now be destroying landscaped properties with jacuzzis, koi ponds, putting greens, etc... instead of just tennis courts.

Request: Maybe the County could help me to understand the adjacent parcel responsibilities/liabilities with regard to the drainage ditch?

Rain Water Runoff Capacity

When we experience heavy rains, the water runoff rushes down Racquet Hill before it disappears into a large storm drain at the back of the cul-de-sac. On several occasions, lower Racquet Hill becomes a river of water flowing curb-to-curb (pictured below - not a worse case example). In addition, the drainage ditch behind my house fills with rushing water.



I suspect that, somewhere downstream, the planned development will dump its runoff into the same system upon which my neighborhood relies. I'm concerned that the rainwater runoff from the planned development will be the "straw that broke the camels' back" and will overwhelm my neighborhood's runoff system.

Request: I would like some assurance that our rainwater runoff system can handle the addition of this unplanned development.

Certified Mail

I read (somewhere) that adjacent parcels would receive communications by Certified Mail (and have meetings with the developer for that matter). I don't know what's been mailed out but I've only received the invite to the first meeting that included the previous tennis club owner.

Request: I would like to make sure that I'm on the developer's communication list of adjacent parcels.

Finally, I would like to restate that I am adamantly opposed to the Ranch Hills Planned Development. It should be pretty clear by now that nobody wants to see this club destroyed... it's literally the developer against everyone and for good reason... We love our club.

Can a single person destroy that which we all love? Please join our entire community and say "No!"

Respectfully submitted,

Chris McCormack
2212 Racquet Hill, Santa Ana, CA 92705
714-975-4556
ctm665@gmail.com

Canning, Kevin

From: Cristie King <dolphin14girl@gmail.com>
Sent: Monday, June 27, 2022 7:00 PM
To: kirkwatilo@gmail.com; Canning, Kevin
Subject: Tustin Hill Racquet Club / Environmental Impact Report

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

I am writing today about the proposed redevelopment of the Tustin Hills Racquet Club and the Environmental Impact Report.

A project of this nature would GREATLY impact my neighborhood!

Traffic is one of my main concerns on many levels: fire/earthquake safety; pedestrian safety as my two kids walk daily on these hills; bicycle riders such as myself; children playing on the street as many are cul-de-sac streets; car traffic for getting out of my street and down the only option we have to exit our community of Foothill Ranch; and parking of cars on the streets.

CC&R changes resulting in a loss of Recreational Open Space area is another top priority to me!

Mr. Zehnder stated the community would have input on the project which has not happened, proposing something different from now is planned, and informing residents before he made formal plans to the County which did not happen!

Fire/Earthquake Safety - Our community has many lush areas and steep hills. If a fire was to start in the neighborhood there is ONLY 1 way out! A project of this sort would create more cars. The study done by the developer for one 24 hour period stated "decreased traffic." The Racquet Club might only have about 70 spaces now, which are NEVER completely occupied. Even when there are parties at the Racquet Club there is NO volume near the added amount of cars that would be present EVERYDAY with 37 Townhomes. Estimating the volume of cars 37 Townhouses would add to be between 74 - 148 more cars, double or triple the current volume EVERYDAY as these would be homes and not the occasional party. How could the study have concluded the existing club use generated 554 daily traffic counts? Furthermore, how could the study have concluded the proposed development would generate only 349 daily traffic use? There is no grocery store, bank, public school, pharmacy, restaurant, or shopping area within walking distance. This number of 349 daily traffic does NOT take into account that drivers would have to go up and down the hill, Simon Ranch Road, to school, work, groceries, ect. more than 1 time per day. A one 24 hour period is not a respective study and needs to be repeated for about a week to get an accurate count. How can the EIR state have little to no impact?

Pedestrian safety - Many of us in the community walk these streets daily. We are unincorporated , have no sidewalks, have hills that are windy, steep, and many have blind areas, and sometimes areas that are very narrow. As we all know many people are in a hurry and distracted drivers

these days and aren't watching for pedestrians. There are many spots where the curve is so severe that one can't see cars or people from either way. How can the EIR state this amount of cars would NOT be significant?

Bicyclists - Just because you live on a hill does not mean you don't recreate there. How can the EIR state little to no impact with 37 Townhomes with a minimum of 2 cars to likely 4 cars per Townhome? Somehow this math doesn't make sense to me of a lower traffic estimate and little to no impact.

Children Playing - We all know cul-de-sac streets are ideal for gathering on. Not all residents have yards to accommodate playing in, as many are on steep hills. Especially in our old established community where we want to be with our neighbors. How can the EIR state it won't impact us with that volume of cars?

Traffic in general - It is hard to leave my street at times and I am directly affected by the proposed development area as My street opens to Simon Ranch Road. Cars from the Townhouses would cause a definite situation for me exiting my street of Liane Lane. One way is traffic volume. A second way is blind corners and with the added sheer volume of cars, it would make it incredibly dangerous. Third, after exiting the proposed development area, they would have no stop sign and would be going downhill generating more speed than myself leaving from a stop sign and turning left, proposing a dangerous situation just due to sheer volume of traffic. All of these streets in my area lead to ONE road, Simon Ranch Road and no one can change that. How is it that the EIR stated little to no impact on traffic? I believe more accidents would be taking place due to the increased volume of cars. The current Racquet Club does not have the volume on a daily basis as the developer study states! Even when there is the occasional party, which happens at night and on weekends, there is not the volume of traffic that would be generated by 37 permanent Townhomes! Townhomes that would full time add between 74 - 148 at a minimum number of cars.

Now looking at the new EIR February 2020 concluding 554 daily traffic counts from the existing Racquet Club and September 2021 concluding 349 daily traffic counts from the proposed residential development. How can the number be so different? Also I challenge the numbers to not be accurate. Does it take into account just 1 leaving and 1 coming home trip? If so, that is not accurate, as one might have to make more trips for school, work, groceries, pharmacy, gas, and general shopping, which cannot be walked to from our community. Most of our single family homes have 4+ legal drivers. Mine had 5 legal drivers. How does adding 37 Townhomes with 2-4 occupants not double or triple the traffic?

How can the proposed development negate that it represents adding 4 times the density of the surrounding community?

How can these 37 Townhomes with increased density not affect Simon Ranch Road, SE Skyline, and Browning Avenue? What about the 2.5 year major construction of this development NOT disrupting traffic in our community?

This is unincorporated Santa Ana/North Tustin, our recorded CC&Rs state that the land will always be for the express benefit of the residents. This land was never meant for high density zoning. It is not an HOA issue. It is a recorded deed issue. An up zoned high density development is contrary to the Covenant. Accordingly, the use of this property belongs to the residents, not the Racquet Club owner. How can this developer bypass this and state it is an HOA issue? There is no HOA issue. It is a deed issue! Our family has lived in this house for years and years, since 1968. It is one reason we bought here because of how the area would remain due to the CC&Rs. The destruction of this valuable recreational space will solely benefit the developer at the community's expense!

The EIR relies on the very broad OC General Plan land-use designation to support the high density development via SB 330 and contains NO General Plan consistency with analysis despite CEQA requirements. The report ignores compatibility issues relative to North Tustin's detailed land and planning. If approved is it 4x the density of the surrounding community, a fact!

The loss of the recreational area for tennis, pickleball, swimming, tennis, yoga, workout area, and occasional gatherings such as weddings or parties is a HUGE loss to myself and the community! The Racquet Club has been here since 1958. The zoned area is for Recreational Open Space and had not been considered by the County. All the parks in the area are located on residentially zoned land. How did the County not take this into consideration?

The developer is required by the County to pay a fee in lieu for not providing recreational/park space within a development and yet they are destroying that recreational space.

Mr. Zehnder promised that there would be ample opportunities for community input prior to formal County submittal. That has not been done! Also he promised the community would be notified when the team applies for final approval. That has not been done! To date, not 1 community outreach or focus group has been conducted by the developer, nor has it provided any community updates. How can Mr. Zehnder get away with this?

C. King

Canning, Kevin

From: Damon Scott <ddscott89@gmail.com>
Sent: Monday, June 27, 2022 11:22 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Comments on Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 37 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bobcats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Best Regards,

Damon and Tracie Scott

Local North Tustin Community Home Owner

714-325-5633

Canning, Kevin

From: Eric Foster <evfoster@hotmail.com>
Sent: Monday, June 27, 2022 12:13 PM
To: Canning, Kevin
Subject: Ranch Hills Development Plan

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 37 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Respectfully,

Eric Foster
North Tustin Resident/Property Owner

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Canning, Kevin

From: GARY & GEORGIA MCDONALD <garfmcd@aol.com>
Sent: Monday, June 27, 2022 4:47 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hi Kevin

Per your letter of June 10, 2022, my wife and I have reviewed the information relating to the Redevelopment of the Tustin Hills Racquet Club property, including the draft EIR. As we understand this, the THRC will be turned into a high density condominium development with 37 units on this property. Our comments follow.

We are opposed to this development proceeding due to the impact to residents of North Tustin, including our residential area on Browning Avenue. We have lived in our Browning Avenue house near the Tustin Memorial Academy for over 40 years and have long enjoyed the low density zoned residential environment in the North Tustin/Santa Ana Unincorporated area. The proposed high density development up the hill would significantly alter the living environment in our residential area.

Clearly the THRC is a location that is isolated and relies on access via a very few residential area streets (Browning being one of the major access roads). There is no way to mitigate this fact, i.e., by expanding the roads. Due to the Tustin Memorial Academy, the traffic congestion on Browning has significantly increased over the years to the point that the street is packed with bumper to bumper cars (school traffic) frequently. We are concerned that the increased traffic, in the near term and in the long term, will further deteriorate the quality of life of our residential area if this project proceeds. More importantly, it will significantly decrease safety for the children walking, biking, skateboarding, crossing the street, playing, or otherwise active along Browning Avenue.

The low density residential zoning of the THRC area was originally established for many good reasons, and this must be maintained because those reasons are still there. This project benefits only the moneyed owners of this property and NOT the local residents. We should not be forced to diminish our quality of life and safety merely to allow profits to a private business operation that is not compatible with the local geography. This high density development should be rejected.

Gary and Georgia McDonald
12842 Browning Avenue
Santa Ana, CA 92705

Re:Tustin Hills Racquet Club Property 27 June 2022

Dear Mr. Canning

I am John Fjeld and I moved into my new home at 11641 Ranch Hill in 1976. I have enjoyed living in Lemon Heights ever since. The Tustin Hills Racquet Club was an attraction for this neighborhood. Our boys learned to swim at the club and we later enjoyed playing tennis at the club. Another attraction for this neighborhood was the 1/2 acre minimum lot size for each home. This has been in the general plan for this area and should be maintained.

The Tustin Hills Racquet Club (THRC) is a recreation asset to this community and due to the limited parks in this area. The THRC should be maintained but definitely should not be replaced by high density housing. High density housing will increase traffic which is not designed for more traffic. Noise during construction is an unwanted nuisance.

Lemon Heights is a pleasant community of like minded people who live here because they enjoy quiet low density living in the hills. Several of our neighbors came here when we did and expected the General Plan to have meaning and protect our way of life. We still expect that.

Sincerely

Original signed by

John Fjeld
714-474-3070

June 27, 2022

Mr. Kevin Canning
Contract Planner
OC Public Works
Development Services / Planning
Kevin.Canning@ocpw.ocgov.com

Dear Mr. Canning – I vehemently oppose approval of the Draft EIR on the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
- **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
- **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. The Club is also open for swimming lessons to the outside public. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site

(the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

- **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
- **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Jack Sullivan
2192 Racquet Hill
Santa Ana, CA 92705

Canning, Kevin

From: Jaime Bauer <bauerbrood@gmail.com>
Sent: Monday, June 27, 2022 12:49 PM
To: Canning, Kevin
Subject: Opposition to Ranch Hill Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of North Tustin. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 37 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development and rezoning of the THRC property.

Thank you,

Jaime Bauer

Canning, Kevin

From: Nugent, Jay <Jay.Nugent@nmrk.com>
Sent: Monday, June 27, 2022 11:48 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Mr Canning,

Thank you for taking the time to read this. I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be really devastating to the North Tustin community.

I have been a resident of North Tustin since only 2014 but the ability to live in a low density area right in the middle of Orange County was THE REASON why we choose North Tustin. When my family and I relocated from the East Coast we specifically choose this area because of the current Zoning which allows .5 homes per acre. That coupled with a recreational club which provides open space, neighborhood activities, celebrations and athletics to residents of all ages not to mention open space for wild life to live was something we never thought we could achieve in close proximity to the Southern California coast. We specifically choose our location BECAUSE of the zoning and knowing that we would be protected versus other areas that would allow for more dense development. The Racquet Club was purchased as recreationally zoned and therefore should stay that way – we are members of the Racquet Club and pay a healthy amount and from my knowledge it appears there are many others like us – I have a hard time believing that this facility that was bought under recreational zoning is not doing just fine financially. The overhead appears minimal and especially with the upgrades to pickleball courts the membership seems strong. For the County and our elected officials to change the zoning is one thing that should not be allowed but to change it and allow high density housing with 37 units is downright preposterous.

I have significant fire and Life Safety concerns for the traffic on these smaller windy roads and strong concerns about the resources required for police and firefighters in the event of an emergency. In addition the wildlife is real -my children have grown to love the owls and wild parrots we hear daily. We have seen coyotes and bats and bobcats frequently.

I really hope the County does the right thing by leaving the zoning in place.

I will leave you with the lyrics from the song Big Yellow Taxi that I think is incredibly fitting and I strongly encourage the planning board and supervisors to listen to it. It was originally written by Joni Mitchell and then redone by The Counting Crows about 20 years ago

“ Don't it always seem to go.....That you don't know what you got 'til it's gone.....They paved paradise and put up a parking lot.....They paved paradise and put up a parking lot ”

- Joni Mitchell – 1974

Jay Nugent
Executive Managing Director

NEWMARK
18401 Von Karman Ave., Suite 150
Irvine, CA 92612
t 949-608-2035
m 617-515-5725
jay.nugent@nmrk.com

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Canning, Kevin

From: Jeff Orchard <danelectrofan1964@gmail.com>
Sent: Monday, June 27, 2022 6:15 PM
To: Canning, Kevin; kirkwatilo@gmail.com
Subject: Response To Draft Environmental Impact (EIR) Report

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

As a family member of original Red Hill Ridge homeowners (Feb. 1968), I am writing in response to the recent draft EIR report. Regardless of changing points of view and legislation, the intent of the original CC&R document stands; that the racquet club shall continue (private or public) at the current location and any introduction of future single family homesites will be of an approximate size of .48 acre each. The thought that 37 residential condominium units on 5.88 acres (the current racquet club property) fit the above declaration clearly violates the original intent of homeownership in this area. Rezoning runs contrary to the original recorded covenant that was executed to preserve the racquet club land in perpetuity for the benefit of residents, not the racquet club owner or future developer. As the future use of this land belongs to the residents, the buyer/developer of the property made their purchase with the knowledge of the restrictive covenant solely benefiting the community. Furthermore, the current street design does not allow for nor was ever intended for a high density development, neither from a quality of life or safety standpoint.

How does the possibility of adding 169 vehicles in the space of 5.88 acres with one development exit (considered a driveway) to a single road development exit (Simon Ranch Road) appear justified under any circumstance? The sheer increase in traffic is a danger to pedestrians as well as a potential public safety disaster in the event of fire, earthquake or other natural occurrence. What assurance would be made that vehicles will not be parking along nearby streets such as Pavillion Drive, Liane Lane, Outlook Lane and Vahala Drive? There is certainly the possibility of not having enough spaces in the proposed development. It is safe to declare that an infill development such as is being proposed will be 4 times the density of the surrounding community. This will negatively impact ALL that live in the area. It is time to stop putting profit FOR A FEW ahead of the greater good of many. I appreciate your time and consideration.

J. Orchard

June 27, 2022

Mr. Kevin Canning
Contract Planner
OC Public Works
Development Services / Planning
Kevin.Canning@ocpw.ocgov.com

Dear Mr. Canning – I vehemently oppose approval of the Draft EIR on the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
- **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
- **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. The Club is also open for swimming lessons to the outside public. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site

(the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

- **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
- **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,



Jim Crogan
7707 E. Wildflower
Orange, CA 92869

Canning, Kevin

From: monica stocks <monicawidell@yahoo.com>
Sent: Monday, June 27, 2022 2:06 PM
To: John Green; Canning, Kevin; kirkwatilo@gmail.com
Subject: Re: Environmental impact report

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

On Monday, June 27, 2022, 01:32:44 PM PDT, John Green <juanverdi1868@icloud.com> wrote:

My name is John L Green I live at 11751 Outlook Ln. N., Tustin CA 92705 with my wife Monica; I have lived here since 1974 (48) years prior to purchasing my three-quarter acre lot I checked with the orange county recorders office to find a declaration on a restrictions dated July 13, 1960 track number 3883 and the red Hill Ridge Estates the recorded venues covenant was executed to preserve issues into Perpetuity for the express benefits of the residence not the tennis club owner or future developers based on my findings at the Orange County records office I purchased my three-quarter acre lot and built my home. My children and grandchildren learn to swim at Redhill racquet club. The racquet club is a great benefit to my family and to our entire community ;there is not anything like it around this area sad to have a loss of recreation an open space area for our community it cannot be replaced.

Fire/life safety

Note: The EIR States less than significant impact on fire/life safety.

Based on what!!?

A comprehensive study was made by our community November 2007 regarding the fire safety concerns of our community.

Note: this was before the concern of 37 new condos 150 more cars and 125 more people.

Evacuation concerns.

In the event of a catastrophic event; fire with Santa Ana winds at 80+ miles per hour there is only one narrow vehicle access points in and out of our community Simon Ranch Road and no sidewalks for pedestrians evacuations would be difficult.

Our 2007 Study indicated that because of the huge trees and palm trees at the access point in and out at Simon Ranch Road If ON FIRE; getting out would be very difficult if not impossible. The most reasonable route would be through the tennis court parking lot lead us onto Racquet Hill Road. Evacuees could take Racquet Hill Road towards skyline there's a small drainage channel just before Las Lucas, they could be used in an emergency.

The building of 37 condos to replace the racquet club; this emergency access point for pedestrians would no longer be available to our community.

NOW WHAT!!?

Fire prevention

We were also looking at fire retardant products that mixed with water could be applied with a garden hose. In addition we look at a swimming pool pumps as a last resort purchasing a fire hose and nozzle with training would have to be our own fire brigade.

Traffic concerns

Note: 37 new condos will bring 150 more cars and 125 more people this does not account for the additional traffic such as gardeners, pool cleaners, house cleaners, delivery visitors and many more. This will impact our community with more traffic our community has no sidewalks given the nature of the walkers ,bikers, dog walkers, and children playing more traffic will certainly create safety issues on our already busy streets.

Given the fact the proposed development represents a density four times the surrounding Red Hill Ridge community with only one access point in and out at Simon Ranch Road, No sidewalks and limited lighting , the traffic generated by the proposed development is of upmost concern for the safety of our entire community. The less than reliable and trustworthy traffic conclusion such as this ,is unacceptable and should not be approved and under any circumstances without further investigation.

The EIR fire and safety report.

Reviewing the entire report I have found the EIR respond to every fire/safety issue is as follows:

One -less than significant impact

Two - no impact

Three-N/A

This EIR Report is not for the benefit of our community but liens for the benefit of the builder.

My opinion is that this EIR Report does not address the concerns of our community, regarding the fire safety issues and evacuation concerns, This report has been misleading.

Culture resource report.

John Torres was the lead archaeologists for the KIZH nation Indian tribe.

He has consulted on this project and the tribe has several concerns; thus far these concerns have been ignored.

John L Green

District Commander Retired

Los Angles City Fire Department

Sent from my iPhone

Canning, Kevin

From: Steve Wikle <stevewikle@gmail.com>
Sent: Monday, June 27, 2022 6:27 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: THRC EIR public comment

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

We have lived in the North Tustin area for the past 22+ years and have enjoyed the sense of community that we have. The THRC has been part of that, and my family remains an active participant in the THRC. We love the semi-rural nature and low density of our area, as well as its funky windy narrow streets. What I didn’t appreciate from the EIR is the inadequate discussion of evacuations in case of emergency.

The area we live in is a high fire risk area. We have have had several fires that got close enough that evacuations were necessary. The increased traffic on La Colina with the current density was scary, and I cannot imaging the impact on traffic that a development of this size would create. For example - a simple stalled car or truck on Simon Ranch would cut off that entire area from emergency services. The current access is not good, and adding any more homes could result in a catastrophe in the event of emergency.

Please add my name to the list of those opposed to any zoning changes of this property.

Sincerely,

John Stephen Wikle, M.D.
11572 Marble Arch Dr
Santa Ana, CA 92705

June 27, 2022

Mr. Kevin Canning
Contract Planner
OC Public Works
Development Services / Planning
Kevin.Canning@ocpw.ocgov.com

Dear Mr. Canning – I vehemently oppose approval of the Draft EIR on the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
- **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
- **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. The Club is also open for swimming lessons to the outside public. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site

(the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

- **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
- **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Kelly Sullivan
2192 Racquet Hill
Santa Ana, CA 92705

Canning, Kevin

From: Laurie Harris <laurieharris76@gmail.com>
Sent: Monday, June 27, 2022 3:29 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Tustin Hills Racquet Club (THRC)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Kevin,

Not sure where to begin putting in writing my sadness, shock and bewilderment over the plans by the new owner (arms length from seller ?) to build dense multi family housing at the THRC site. This is in reference to the Draft EIR for the PA189034/VTTM 18119 - RANCH HILLS PLANNED DEVELOPMENT.

We moved to North Tustin from North Irvine 14 months ago in order to live in a more rural, country feel area with less traffic and noise. Here we have found it very peaceful with birds and animals.

Thank you for taking the time to read this. I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be really devastating to the North Tustin community.

Sent from my iPhone

Canning, Kevin

From: Laurie Harris <laurieharris76@gmail.com>
Sent: Monday, June 27, 2022 5:12 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Tustin Hills Racquet Club (THRC)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Not sure where to begin putting in writing my sadness, shock and bewilderment over the plans by the new owner (arms length from seller ?) to build dense multi family housing at the THRC site. This is in reference to the Draft EIR for the PA189034/VTTM 18119 - RANCH HILLS PLANNED DEVELOPMENT. My understanding is that the THRC site is zoned Recreation Open Space. A recorded Covenant is also in place to keep the land use as is. An attempt to utilize SB330 is a loophole for greed purposes only, not social policy. These housing units will have NO access to shopping , transportation or amenities. They will have to travel by car on narrow and winding roads to centers at least 2 miles away . I believe this grossly defeats any intent of SB330.

We moved to North Tustin from North Irvine (dense tract homes) in order to live in a more rural, country area with less traffic and noise. Here we have found it very peaceful with birds and animals and able to safely walk the streets in the area . The availability of the recreational use of the THRC was one of the many reasons we bought in this area. We can walk/bike to enjoy the amenities. We recently went to Irvine Regional Park(only 6 miles at Jamboree) and had to park our car 2 miles away and WALK. Never again. Obviously having a recreational area which we can easily walk to is preferable and needed.

A dense multi unit development means a lot more cars traveling Simon Ranch Rd and overflow parking issues onto surrounding streets , whether it's owners or visitors. The narrow winding roads also give the area part of its charm as there are no traffic lights , few stop signs and street lights. It also means more delivery(Amazon/Fed ex), gardener trucks and busyness in a concentrated area.

With Simon Ranch Rd being the only way in and out of the community , I also believe that this new development is a FIRE/SAFETY hazard.

Any emergency would be compounded by the addition of dense housing and narrow winding roads for exit or emergency vehicles . Browning Ave. would be the main exit route away from the hills and adding more homes does not make sense and endangers those above us on Skyline Dr.

PLEASE help us keep our community safe and quiet. PLEASE keep the THRC in place to give families and young people a place to go within walking distance . It seems counterintuitive policy to build here , because it would actually be CAUSING more car trips, traffic and pollution from the EXISTING residents to find other recreation areas(remember Irvine Regional Park?)

Final note. Zoning change ? Recorded covenant in place ? Build dense but no amenities using SB330? Current residents actually lose amenities and harmed intent of SB330? This is WRONG.

Thank you

Laurie Harris
11871 Simon Ranch Rd
North Tustin, CA 92705-3352

(949)933-4047

Sent from my iPhone

Canning, Kevin

From: przywam@aol.com
Sent: Monday, June 27, 2022 1:13 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com; przywam@aol.com
Subject: EIR, Fire, Life & Safety

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Planning Commission,
Mr. Kevin Canning,

I am writing to you to voice my concerns regarding EIR conclusions and to ask you to reject the proposed high density development of 37 residential condominium units in our community.

The proposed development would have a tremendous impact on the community safety. It would endanger lives of our playing children, walkers, bikers by creating more traffic on very narrow, dark and winding streets. In case of an emergency (fire, earthquake) there is only one narrow vehicular access for the entire community. With the narrow streets and no secondary access, we all will be TRAPPED. I am sure that HUMAN LIFE IS THE MOST IMPORTANT issue for Planning Commission and will override the profit driven development of 37 residential condominium units.

As an engineer/project manager working on land development projects in Southern California, I know that the project implementation will negatively impact traffic, fire hazard and life safety. It will also increase consumption of water, energy and affect air quality and waste pollution.

Additionally, long term construction activities will impact traffic, noise and air quality for the community.

When we bought our home on Salt Air Dr., we wanted to live close to the club to stay fit and healthy. Our entire family are members of the club, play tennis 3 times a week, swim, use the gym and participate in social activities. The club creates the character of a family neighborhood, feeling of a community. When we purchased our home, we understood that the club will be here for our grandchildren and great grand children, because of this specific zoning and the recorded CC&Rs for Tract 3883 that run with this parcel.

By allowing the developer to build 37 residential condominium units, OCPW would deprive the community, members and all users of the club, of the only recreational facility in the area.

In summary, the SAFETY and common sense shall prevail.

PLEASE DO NOT APPROVE THIS PROJECT!!!

Sincerely,
Marek Przywara, P.E.
2272 Salt AIR DR

Canning, Kevin

From: J. Orchard <2orchard0391@gmail.com>
Sent: Monday, June 27, 2022 6:44 PM
To: Canning, Kevin
Subject: Re: Response to Draft Environmental Impact Report Tustin Hills

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

I have lived in the Foothill community for over 50 years. I walk the area most days, and even without sidewalks, I always feel safe. People and kids are safe to walk, ride bikes, skateboard, ect. because the FEW cars we see are aware and considerate of them. There are relatively few cars and with this proposed high density Townhouse development there will be many more cars to deal with and possibly not as careful to those of us walking. We are in a good place now and will I feel safe with more cars and people driving on our streets?

During the time I have lived here, we have had 2 fire scares that I remember well. During 1 it was so close that we could hear the firemen yelling to each other. The other time a fire truck was parked at the end of the street for an entire day. We had cars packed and ready to go. Yes it can happen, and this was before the drought, winds, and climate change problems.

Remember that proposed development has only 1 ingress and egress, which would make it very difficult, if not impossible to get to a safer area. With the proposed 37 new Townhouses to the area , how would we all be able to get out? There are already 118 homes in the Foothill Ranch area with 2-5 cars for each household. How would adding 74 - 148 more cars to the mix NOT be an impact per the study done by the developer? The study done by the developer states a "significant decrease" from the existing club/banquet use. This is NOT an accurate statement! I have NOT EVER had to wait for more than 2 cars coming from the Tennis Club. There is no secondary access to our community and residents will be trapped if something catastrophic happens like earthquake or fire!

Also remembering there are no grocery stores, pharmacies, schools, shopping areas within walking distance from our community. So the added traffic from the development would be severely increased due to the many up & down trips by cars. Just saying the cars would just go to work and come home is not accurate. How has the developer, who monitored the traffic for one 24 hour period, proposed that having more homes would generate less traffic?

My CC&R's state that our community was built to limit commercial and dense residential areas. The County and surrounding cities have agreed with this. Our area is a unique well planned community and should remain as such without the threat of outside developers destroying the existing community. We would lose our recreational space of which our area is zoned for. How can the developer get around this fact?

Mr. Zehnder misrepresented what he was originally going to build to us residents in 2018. He promised ample opportunity for community input prior to formal County submittal and that we residents would be notified when the team applies for final approval, none of which happened. How can he be allowed to bulldoze over those commitments?

As a long time resident of the area, we need more recreation and not more cars. SAVE the Racquet Club!

Mrs. Nancy Orchard

On Mon, Jun 27, 2022 at 6:16 PM J. Orchard <2orchard0391@gmail.com> wrote:

I have lived in the Foothill community for over 50 years. I walk the area most days, and even without sidewalks, I always feel safe. People and kids are safe to walk, ride bikes, skateboard, ect. because the FEW cars we see are aware and considerate of them. There are relatively few cars and with this proposed high density Townhouse development there

will be many more cars to deal with and possibly not as careful to those of us walking. We are in a good place now and will I feel safe with more cars and people driving on our streets?

During the time I have lived here, we have had 2 fire scares that I remember well. During 1 it was so close that we could hear the firemen yelling to each other. The other time a fire truck was parked at the end of the street for an entire day. We had cars packed and ready to go. Yes it can happen, and this was before the drought, winds, and climate change problems.

Remember that proposed development has only 1 ingress and egress, which would make it very difficult, if not impossible to get to a safer area. With the proposed 37 new Townhouses to the area, how would we all be able to get out? There are already 118 homes in the Foothill Ranch area with 2-5 cars for each household. How would adding 74 - 148 more cars to the mix NOT be an impact per the study done by the developer? The study done by the developer states a "significant decrease" from the existing club/banquet use. This is NOT an accurate statement! I have NOT EVER had to wait for more than 2 cars coming from the Tennis Club. There is no secondary access to our community and residents will be trapped if something catastrophic happens like earthquake or fire!

Also remembering there are no grocery stores, pharmacies, schools, shopping areas within walking distance from our community. So the added traffic from the development would be severely increased due to the many up & down trips by cars. Just saying the cars would just go to work and come home is not accurate. How has the developer, who monitored the traffic for one 24 hour period, proposed that having more homes would generate less traffic?

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Mr. Zehnder misrepresented what he was originally going to build to us residents in 2018. He promised ample opportunity for community input prior to formal County submittal and that we residents would be notified when the team applies for final approval, none of which happened. How can he be allowed to bulldoze over those commitments?

As a long time resident of the area, we need more recreation and not more cars. SAVE the Racquet Club!

Mrs. Nancy Orchard

Canning, Kevin

From: Nancy Sansevero <nancysans2020@outlook.com>
Sent: Monday, June 27, 2022 8:17 AM
To: Canning, Kevin
Subject: FW: NO Re-zoning letter

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

June 26, 2022
Louis and Nancy Sansevero
11809 Willard Avenue
Tustin, CA 92782
(714) 731-7267

To All Parties Concerned,

We received notice of the proposed plan of Zoning changes to the property located directly behind the home that we have lived in for over a decade. We typically intentionally purchase homes, including this property at 11809 Willard, that do not have residential property located directly behind our homes. We have made these home buying decisions for the purpose of privacy. We had an expectation of privacy when purchasing this home and that is now being challenged. As such, we are vehemently opposed to the Zoning changes that are being proposed.

The existing Racquet Club on the land behind our home does not and has not caused issues for us with regard to privacy, noise, pollution, flooding, or other geological/environmental concerns.

It is our opinion that the re-zoning of this property that would permanently alter the character of the neighborhood and diminish the property values and rights of numerous homeowners in both Treviso and North Tustin.

We believe there is a legal prohibition of the developer's intent, with a restricted covenant running with the land that prohibits it from being rezoned for high density condominium housing.

We intend to stand with our neighbors in opposition to this proposed zoning plan to share our voice and defend our right to privacy and work collectively with our neighbors and other organizations to take action to put a stop to this re-zoning proposal.

Nancy and Louis Sansevero

Canning, Kevin

From: Phil Harris <philh@ucpack.com>
Sent: Monday, June 27, 2022 4:24 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Kevin Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. When my family and I moved to North Tustin, we were excited about finally living in an area that had a strong sense of community along with a recreational facility that both my family and I could enjoy. The Tustin Hills Racquet Club (“THRC”) provides a lot of the young kids in the area with much needed activities. Building high density housing in the middle of our community not only takes away from these much needed activities for families and young people, but it is also going to create traffic, parking and safety issues for our community. I have significant concerns for the increased traffic on the smaller windy roads in our community and strong concerns about the resources required for police and firefighters in the event of an emergency. Also, the type of high density housing that is being proposed doesn’t fit into the beauty and tranquility of the surrounding neighborhoods. A lot of the high density housing being built today is within walking distance to shopping areas, restaurants and has public transportation...the Ranch Hills Development offers none of this. Transportation to and from the Development will be by car and greatly increase the daily traffic through an area that already has limited access.

As such, I am opposed to any zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be really devastating to the North Tustin community.

Please leave the current zoning for recreational use and allow the THRC to continue to be a place where the younger generation and families can socialize and grow through sports and community.

Thank you for your consideration.

Regards,

Phillip Harris
11871 Simon Ranch Rd.
North Tustin, CA 92705

Canning, Kevin

From: Sharon Cuniff <sharon@pct.com>
Sent: Monday, June 27, 2022 5:13 PM
To: Canning, Kevin
Subject: from a concerned North Tustin neighbor

Importance: High

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hi Kevin,

I was given your name to voice my concern about the possibility of building 37 condo units near our home.

We purchased on SE Skyline Dr in North Tustin back in 2007 (15 years ago) when we fell in love with the neighborhood, the community, and the great curb appeal our new home and neighborhood possessed. One of the main reasons we purchased in this area was that all the homes in our neighborhood all have large, secluded lots for privacy which adds to the uniqueness of the area, including the use of the Tustin Hills Racquet Club.

In addition, the purchase of our home in this area was and is an investment for our retirement. We don't want to see home prices go down due to the major impact of building high density condominiums right around the corner that have no place in this community.

Since we live on a "feeder" street to the Racquet Club this will cause increased traffic right in front of our home and I'm really concerned for the pedestrians, children and bikers (including ourselves) who enjoy using the street daily. As you are aware, there are no sidewalks and this is a HUGE safety concern for us - the existing homeowner! Also, the traffic disruption everyone will have to endure while this major construction happens. What will it be? Over 2 years of traffic delays? Not sure if all these residents deserve what is happening.

I see they are already planning condos in the Tustin Marketplace and will be removing stores. Let's keep these condos out of our neighborhood so we can enjoy what we spent our hard earned money on to be able to live in this special area.

Respectfully,

Sharon Cuniff

NOTICE: The information contained in this message is proprietary and/or confidential and may be privileged. If you are not the intended recipient of this communication, you are hereby notified to: (i) delete the message and all copies; (ii) do not disclose, distribute or use the message in any manner; and (iii) notify the sender immediately.

Canning, Kevin

From: Stacy Lovein <stacylovein@gmail.com>
Sent: Monday, June 27, 2022 4:49 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Mr. Canning,

Thank you for your time and consideration of all responses to the EIR. I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised that our household is opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be devastating to the North Tustin community and my family.

I was born and raised in Yorba Linda, a town that once had a very similar feel to North Tustin – until the land was overdeveloped and lot size and community was replaced by overplanned communities and developers. In 2012, I first drove through the North Tustin community and immediately fell in love with this gem within Orange County – a place untouched by developers reminding me of what Yorba Linda once was. The neighborhoods are spread out and, as I learned more about the community while searching for a home in North Tustin from 2018 to 2020, I realized that North Tustin is a community that waves flags, has bike parades for the kids, and gathers at a place called the Racquet Club. The Racquet Club was always an added bonus not only for families to enjoy tennis and swimming, but also for residents in general who appreciate the quality and connectedness that the club offers to our special community.

In 2020, my husband and I found our forever home in North Tustin with our children to plant roots and raise our family here in this special community and on this special street. We live on Pavillion Drive, my kids ride their bikes up past the five houses to the Racquet Club and back down the hill. In just our two years on the street, my girls have learned how to swim at the Racquet Club. My oldest is finally old enough to attend her first tennis summer camp this summer and is thrilled. My husband and I took tennis lessons and now regularly play at the club. I met a group of soccer moms in the Fall and we join together every Tuesday at the Racquet Club for a clinic. We are members of the Racquet Club and it is central to our family. When we bought our house, I thought the Racquet Club was a special part of that purchase; in two years living in that home, I KNOW that the Racquet Club has been a special part of that purchase. We have forged relationships, built community, and enjoyed it multiple times a week.

The Racquet Club was purchased as recreationally zoned and therefore should stay that way – we are members of the Racquet Club and pay a healthy amount and from my knowledge it appears there are many others like us – I have a hard time believing that this facility that was bought under recreational zoning is not doing just fine financially. The overhead appears minimal and especially with the upgrades to pickleball courts the membership seems strong. For the County and our elected officials to change the zoning is one thing that should not be allowed but to change it and allow high density housing with 37 units is frankly offensive and threatening to my family.

My concerns involve, but are not limited to the following:

(1) Project Theme

The increase of parked cars on our street because the condos will not have driveways or significant parking space is an encroachment and safety hazard to my children. More parked cars and increased traffic from potentially 100 additional drivers and no sidewalks will create a serious life safety issue for residents, namely my young children. Further, the

designation of an “intersection” is laughable, it is currently a driveway – that said, the thought of a “intersection” impacting my neighborhood is even more concerning. Presumably, the large increase in traffic from this community would require an “intersection”, which would degrade the aesthetic and safety of the very street I live on and walk with my family.

(2) Transportation / Traffic

Traffic generated by the proposed high-density development will have a significantly negative impact on traffic and pedestrian safety on our neighborhood streets. Many of our neighborhood streets are narrow, windy, have no sidewalks and minimal, if any, streetlights, including my very street, the one that will be impacted by this development. Given the number of walkers, bikers, children playing, aka my children - more traffic will certainly create safety issues on our already busy streets. As is, with cars parked on Pavillion outside of homes, only one car can get through each way and you have to stop to let traffic pass – this will only be compounded by this development. Further, in recent weeks, just a repaving of our street caused a serious disturbance to the area. One cannot imagine the disturbance caused by construction of this new development over several years and then the continual traffic and parked cars on our streets caused by these new neighbors and their visitors.

(3) Wildfire / Wildlife

I have significant fire and life safety concerns for the traffic on these smaller windy roads and strong concerns about the resources required for police and firefighters in the event of an emergency. This is a high risk area for fires. In our two years, we have been evacuated on multiple occasions. As mentioned previously, our narrow streets do not allow for easy egress and this roadway infrastructure was never and is not designed to accommodate high-density housing with no secondary access. This would endanger the lives and safety of existing residents and those proposed residents.

Finally, to say only rats and lizards would be impacted by this development is disingenuous. Every morning, my husband and I sit on our patio with our morning coffee and watch the rabbits and their baby bunnies hop across our front yard. In fact, we had to stop our car in front of the Racquet Club on our drive home last night while a rabbit sat and decided which way he wanted to go on the street - our girls thought it was adorable. We also had a lovely snake inside our home just this year. We also regularly see hawks, falcons, mice, and bees buzzing in our yard. If I’m seeing these animals in my yard, the proposed development will surely disrupt and displace this wildlife.

I sincerely hope the County does the right thing by leaving the zoning in place and, not only saving the Racquet Club, but my family’s community and safety.

Thank you for your consideration.

Mark and Stacy Lovein

Canning, Kevin

From: cuniff1@earthlink.net
Sent: Monday, June 27, 2022 4:47 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Please do not allow high-density housing at the Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Kevin Canning,

My wife and I purchased our home on Skyline Dr in North Tustin back in 2007 when we fell in love with the neighborhood, the community, and the great curb appeal our new home and neighborhood possessed. One of the main reasons we purchased in this area was that all the homes in our neighborhood all having sizable and secluded lots which adds to the uniqueness of the area, including the Tustin Hills Racquet Club.

In addition, the purchase of our home in this area was and is an investment for our retirement. We don't want to see home prices go down due to the major impact of building high density condominiums right around the corner that have no place in this community.

Since we live on a feeder street to the Racquet Club this will cause increased traffic right in front of our home and I'm really concerned about the many pedestrians, children and bikers (including ourselves) who enjoy using the street daily. There are no sidewalks and this is a huge safety concern for the existing homeowners and families! Also, the disruption all the current residents will have to endure due to the traffic disruption for years for this major construction.

Sincerely,

Steve Cuniff

714 336-6310

June 27, 2022

Mr. Kevin Canning
Contract Planner
OC Public Works
Development Services / Planning
Kevin.Canning@ocpw.ocgov.com

Dear Mr. Canning – I vehemently oppose approval of the Draft EIR on the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
- **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
- **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. The Club is also open for swimming lessons to the outside public. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site

(the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

- **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
- **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Thomas Green
1031 Hyde Park Dr.
Santa Ana, CA 92705

Canning, Kevin

From: Tom Leahy <tom@onehopewine.com>
Sent: Monday, June 27, 2022 3:47 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Save the Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,



Tom Leahy
Co-Founder / CCO
858.337.1437
onehopewine.com

Canning, Kevin

From: Anita Prietto <anita.prietto@yahoo.com>
Sent: Tuesday, June 28, 2022 4:16 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Save THRC

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – *traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
2. **Fire Safety** – *Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
3. **Recreation / Open Space** – *the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.*
4. **Recorded Land Use Covenant** - *Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.*

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Anita Prietto

Canning, Kevin

From: Anne Gardner <acgardner@icloud.com>
Sent: Tuesday, June 28, 2022 10:04 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- 1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
- 2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
- 3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.*
- 4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.*

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Anne Gardner

PS. Mr. Canning, the county has already negatively impacted our neighborhood in Cowan Heights by allowing a zoning change (in lot size) which should never have happened; and, allowing businesses to purchase homes for rehab facilities as well. Families make one of their largest investments in where they live and they do so based on what the zoning is and where they feel their children will be able grow up safely. For the county to change zoning in such a way that is detrimental to all existing home owners and families is outright wrong. No if, ands or buts, it is wrong. Please don't repeat your mistake again with another area in N Tustin.

Canning, Kevin

From: Bari Brennan <barigal@pacbell.net>
Sent: Tuesday, June 28, 2022 8:26 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Comments to Draft EIR for Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning and County Decision Makers,

I am writing with respect to the proposed development at the racquet club site. I write as a resident of south Orange County with roots in the affected neighborhood. The outcome will not affect me, at least not financially.

I previously weighed in with my thoughts, as did many, about the incompatible nature of high-density, attached housing in an otherwise neighborhood of half-acre estates. Today's correspondence is to focus on what is truly the most important impact that any development will have on the existing area, and that is the effect on SAFETY.

The planners state that the proposed development will have no effect on safety. I disagree. I do this as someone who rode her bike and then drove for many years on the streets around and in the Red Hill Ridge/Simon Ranch neighborhood and **I do so from the unique perspective of someone who has had a family member die in an accident on a street not far from the club.**

The residential streets of North Tustin are not lit (except at intersections). The streets themselves are dark. They do not have sidewalks. In the area of the proposed development the streets are single lane in each direction and without bike lanes. There are homes with driveways and front walks that face onto Simon Ranch Road. Cars will back out on to the street and families will enter cars parked on to this road to which many proposed car trips would be added. These residential streets will never become wider. Or flatter. Drivers will not become safer, and their cars are becoming more quiet, so more dangerous. I worry for the pedestrians and the children on bikes, dogs and those walking them. All so that someone can optimize on an investment.

Another area of safety that I recently gained perspective on occurred during the very recent Coastal Fire in the city where I now live. After watching a very expensive neighborhood burn, we then heard many accounts of how difficult it was to evacuate the area due to routes blocked by emergency vehicles and visibility impaired by smoke. Mind you, the evacuated hilly neighborhoods in Laguna Niguel feed onto streets with **two** lanes in each direction and have more than one point of ingress/egress. The surrounding streets in North Tustin (Browning Avenue, Beverly Glen, and Skyline Drive) are all **one** lane in each direction, and Simon Ranch does not have a back door for fire escape.

While much infill development is currently taking place throughout OC permitting a development as dense as this proposal for the Simon Ranch neighborhood is a bad fit. It isn't affordable housing. Who are we kidding? Nothing in North Tustin is "affordable", and certainly not a newly built home. 37 units are proposed to make the project's bottom line larger, and this amount of housing units would be a burden to the area's infrastructure and safety.

So, in closing, when making a decision for these 5.8 acres please focus on the impact to safety that adding dense housing with condo-narrow streets to an already aging, poorly lit, hilly neighborhood will have. Thank you very much for taking the time to read my comments.

Bari Brennan
Lifelong OC Resident

Canning, Kevin

From: Anita Zantos <anita.zantos@gmail.com>
Sent: Tuesday, June 28, 2022 7:49 PM
To: Canning, Kevin
Subject: Red Hill Ridge Project

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – We vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- Safety! The traffic in our neighborhoods is affected almost continuously by construction, county improvements, and homeowners parties. Our street was recently restricted to one side only parking because of the issue of whether or not two fire trucks could pass each other in case of emergency, if cars were parked on both sides of the street. This green space can actually act as a buffer between homes and wildfires. Additionally, homeowners insurance is becoming more and more difficult to obtain because of the wildfire threat—we have had two companies cancel us in the last two years, and our current coverage requires a \$14,500 deductible. This is not affordable for your demographic.

We have lived in this area for almost 30 years and have been under mandatory and voluntary fire evacuations. This situation will only be exasperated if this project of high density housing is built.

- Community! The existing tennis club has been a gathering place for residents in the surrounding area for multiple generations. Other tennis, swimming and gathering areas for our community are non-existent. The current addition of pickleball courts has extended recreation opportunities for those of us who are aging in place. We who brought our children here for summer swim lessons and tennis camps have been returning with our grandchildren and great grandchildren and found new friendships, creating a tight knit community open to all. Once this land is developed, there will not be another opportunity for local recreation.

- Zoning! Our area has experienced zone changes in the past and the neighborhood can be blighted by poor construction and/or uncompleted projects (just take a look at the project on Newport Blvd and Skylark). Why should developers be able to come into a neighborhood with the idea to rezone and make hefty profits at the detriment of the rest of the neighborhood?

- We need county support! This particular developer tried a very similar project in Newport Beach, to convert tennis courts to high density housing, but they were denied this opportunity. Now they have turned their sights on our community because zoning changes have been allowed in the past. And I believe because we are in the "county" and unincorporated that they think they will have a better chance of success. Protect us!

Please, please, please do not let this happen

Sincerely,

Bob and Anita Zantos

10002 Deerhaven Dr.

Santa Ana, Ca 92705

Canning, Kevin

From: Bobby Aschtiani <bobbyasch@gmail.com>
Sent: Tuesday, June 28, 2022 1:31 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal street lighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Bobby Aschtiani

**CHRISTOPHER C. KIEHLER, SCLS
13341 MOUNT HOOD DRIVE
NORTH TUSTIN, CA 92705**

(714) 322-2545

June 28, 2022

**Mr. Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
P.O. Box 4048
Santa Ana, CA 92702-4048**

Re: Opposed to Ranch Hills Planned Development

Dear Mr. Canning –

I am adamantly opposed the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) in the hills of North Tustin for the following reasons:

Traffic and Circulation – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, winding streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.

Fire Safety – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.

Recreation / Open Space – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club’s clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a “zoned” parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

1. Recorded Land Use Covenant - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
2. Affordable Housing - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions. The proposed price points of the proposed units are wildly above that of “affordable”!

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents’ safety above the monetary gain of a few.

Thank you for your consideration.

Sincerely,



Christopher C. Kiehler
13341 Mount Hood Drive
North Tustin, CA 92705

Office: 609.203-8419
chris.kiehler@burlington.com

Canning, Kevin

From: Dani <daniodell@aol.com>
Sent: Tuesday, June 28, 2022 5:06 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Mr. Canning,

Thank you for taking the time to read this. I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be really devastating to the North Tustin community.

Hands down this area is known and valued for it's large lot sizes and custom homes. Our neighborhoods are spread out and The Racquet Club has always been an added bonus not only for families to enjoy tennis and swimming, but also for residents in general who appreciate the quality and connectedness that the club offers to our special community. The space it provides for both members and non-members acts as one of Tustin's landmark locations. I don't think there are many people who have not been to an event there, whether it was tennis, swimming, a wedding, a party or a fundraiser.

For the County and our elected officials to change the zoning is one thing that should not be allowed but to change it **and** allow high density housing with 37 units is downright crazy.

The fire and Life Safety concerns for the traffic on these smaller windy roads, as well as, concerns for the resources required for police and firefighters in the event of an emergency are real, as well. In addition the wildlife that we will lose is very sad. We love the owl sightings and wild parrots that we hear daily. We have seen coyotes and bats and bobcats frequently. This is something that we should not be too hasty to push out.

Our community has a lot of charm that needs to be cherished ... and this is one of those places that should be cherished. It is one of the reasons we decided to live here and I am sure it is why so many others have decided to call Tustin home.

I sincerely hope the County does the right thing by leaving the zoning in place.

Thank you for your consideration.

Dani O'Dell

Canning, Kevin

From: Dave Kennard <dkennard@catalystcappartners.com>
Sent: Tuesday, June 28, 2022 8:58 AM
To: Canning, Kevin
Subject: Tustin Hills Racquet Club Environmental Impact Report Review

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Kevin,

Good morning. My name is Dave Kennard. My wife Deborah and myself have been homeowners in the North Tustin community in excess of 20 years. We are current members of the Tustin Hills Racquet Club and have closely followed the sale of the club and potential redevelopment of the site. Please allow my wife and I to add our names to those who strongly oppose the redevelopment of the site for new housing. As I'm sure you're aware, there is a recorded Covenant that runs with the land between the residents of the surrounding tract and the club, preserving its use as a tennis club in perpetuity for the express benefit of the residents of the tract. The club was a consideration when we bought into the neighborhood and approval of a conversion of the site to new high density residential housing would seem to be a violation of that covenant and loss of an amenity that we have utilized for several years.

We walk the neighborhood surrounding the club several times a week. There are limited areas of actual sidewalks and NO sidewalks in certain areas of Simon Ranch Road, the primary feeder to the club. It's my opinion that it would create an increased safety hazard to ourselves if in fact a conversion was made to provide for new higher density residential housing which would result in increased traffic counts on Simon Ranch Road, particularly at the time of day when we are exercising which is early in the morning.

Thank you for taking time to consider our appeal. We are passionate about our community, take pride in ownership of our home and want to do our part to sustain the quality of life in the neighborhood.

Thank You,

Dave and Deborah Kennard.



Catalyst Capital Partners

Dave Kennard • Principal

Catalyst Capital Partners

m. 714.345.1062 |

e. dkennard@catalystcappartners.com | w. catalystcappartners.com

s. One Park Plaza #600, Irvine, CA. 92614

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Canning, Kevin

From: David Harbour <dharbour@wdland.com>
Sent: Tuesday, June 28, 2022 12:27 PM
To: Canning, Kevin
Cc: 'kirkwatilo@gmail.com'; Susan Harbour (susharbour@gmail.com)
Subject: Opposition Memo re: Tustin Hills Racquet Club Re-Zone Application & Draft EIR

Importance: High

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Kevin,

I would like to open by pointing out that you and I used to discuss land acquisition opportunities while you were at Brehm Communities in the early 2000's. I continue to broker residential land and otherwise provide land development advisory services in my professional career. I am a strong advocate of the homebuilding industry and longtime member of the BIA. With that said, I strongly oppose the re-zoning and re-development plan of the Tustin Hills Racquet Club ("THRC"). In summary, while there appear to be material negative environmental impacts (not my area of expertise), my overwhelming concerns are common sense based arguments focused on 1.) density/housing plan egregiously inconsistent with the character of the community and 2.) removal of one of the very few recreational use/open space parcels in the North Tustin Hills community.

I live at 11601 Las Luces (92705), which is roughly a ¼ mile from THRC. My wife and I purchased our single story home on a roughly ½ acre lot in March 2017 specifically to escape tight/dense subdivisions, noise and traffic in exchange for larger private space with a view, peace and quiet in a more rural setting. Previously, we owned a 3,200 sf two-story home with a 3rd story finished attic on a roughly 4,500 sf lot down the hill on Jamboree Rd at the border of Tustin Ranch and Irvine. It was a typical Irvine Co subdivision consisting of a mix of small detached lots and townhomes with a central pool, tot lot and common green space. Additionally, the immediate area included a plethora of parks and recreational open space. This type of living served its purpose while we were a family with two young boys. However, as my sons approached High School age, we were worn out by the higher density housing, traffic, noise, lack of private space, etc. My wife, who grew up here, sold me on trading a higher energy suburban (Tustin Ranch) setting for a more rural setting in the unincorporated North Tustin Hills.

While these two homes are located within 1 mile away from each other as the crow flies, they are within vastly different communities. The lots surrounding the THRC and throughout the unincorporated North Tustin Hills (including our home above THRC) are half-acre minimum. What the Tustin Hills community offers is a semi-rural setting as it always was intended consistent with large lots/private space, peace and quiet. What the Tustin Hills community lacks is public open space and recreational amenities. In fact, THRC is the only park or recreational amenity within reasonable walking distance of our home and one of the very few in the entire North Tustin Hills community. THRC serves as a default community center that we don't otherwise have in North Tustin Hills. I have regular conversations with neighbors who walk by my home to/from tennis and pickleball outings at THRC. We absolutely love the North Tustin Hills community including the THRC and feel it is a hidden gem in Orange County that must be preserved.

There is absolutely no rational justification to convert THRC into housing with density any higher than 2 du/ac. As mentioned above, the surrounding area to THRC and most of the North Tustin Hills community consist of minimum ½ acre lots. The character of the community is semi-rural. The re-development plan of THRC is egregiously inconsistent with the character of the community. As a real estate professional and new housing advocate, this plan makes ZERO sense. I would support a well designed plan with minimum half acre lots consistent with the character of the community

EXCEPT for the fact that the THRC serves as our only community recreational amenity and default community center. Our community simply lacks parks and open space and THRC provides a welcomed oasis.

Re-zoning the property would set a dangerous precedent for the North Tustin Hills community. North Tustin Hills has always offered and continues to offer an attractive alternative to higher density housing in most of Orange County. This community was established with large lot residential land use designations and it is UNITED in preserving them. If the County approved a new subdivision with lots of anything less than half acre minimum, it would establish a very dangerous precedent that would forever negatively impact our community (ie. Property values, traffic, park/open space, quality of life, etc). It would be irresponsible and reckless for our County leaders to approve any project that does NOT protect the character of the community as the basis for which my neighbors and my family moved into it. I challenge staff, the planning commissioners and the Board of Supervisors to educate themselves on the North Tustin Hills community and consider their support or lack thereof assuming they lived within it.

Demand for semi-rural living in Orange County, which the North Tustin Hills community offers, is increasing. Orange County has added over 50,000 apartment and condominium units in the last ten years and largely in surrounding communities like Tustin (District), Anaheim and Irvine. While this high density housing has addressed a need for affordable housing in the County, it has come at a big price as our infrastructure especially our roads and freeways are overburdened. Many people are growing increasingly weary of the traffic, congestion and cramped lifestyles and are seeking safe havens like the North Tustin Hills community as a high quality of life alternative. This community and its semi-rural character must be preserved to maintain balance of housing options and address the increasing demand for larger lots and private living space. We simply do not have enough semi-rural/larger lot communities to meet the demand in Orange County and sadly, this deficit is only going to increase as developers' scheme with the County to up-zone property to maximize density/profits at the detriment of thriving communities. PLEASE DON'T ALLOW THIS TO HAPPEN IN NORTH TUSTIN HILLS. It would be irresponsible planning.

While re-Development of THRC would create negative environmental impacts that will be countered by developer biased/flawed/manufactured studies, this detracts from the focus of my primary practical opposition arguments above: 1. Re-Development would forever negatively alter the character of the North Tustin Hills community and set a dangerous precedent for future spot re-zoning within it and other unincorporated areas of Orange County. 2. THRC offers one of the very few recreational amenities in our North Tustin Hills community that otherwise lacks parks and open space.

Don Wagner has consistently pledged his opposition against the re-zoning of THRC. He made this pledge prior to his election to the Board of Supervisors and has ratified his opposition in support of the Tustin Hills community in writing and verbally on multiple occasions. We ask for his continued and consistent support and ask that he helps with the education process of staff, planning commission and his fellow supervisors to help them understand why preserving THRC is so important to the community and why any new home development should be well planned and consistent with its character. The current plan fails miserably and appears to be a typical ill conceived start-high-and-compromise approach. Please don't be fooled by this developer and I encourage you and other County leaders to deny any change of zoning and preserve the North Tustin community and one of its only recreational/open space amenities!

Thank you,



DAVID HARBOUR, *Partner*
BRE LIC. NO. 01344587

OFFICE 949.789.4555 x16

MOBILE 949.419.4229

EMAIL dkharbour@wdland.com

WEB wdland.com

MAIL 530 Technology Dr, Suite 100 Irvine, CA 92618



[vCARD](#) | [BIO](#) | [LISTINGS](#)

Canning, Kevin

From: David Holt <dholt@holtlawoc.com>
Sent: Tuesday, June 28, 2022 8:11 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development Planning Application NO. PA 18-0034

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am emailing you regarding my opposition to the proposed redevelopment of the Tustin Hills Racquet Club (THRC). My family purchased our home in 2002; my property abuts the THRC. I have reviewed the Draft Environmental Impact Report (EIR). There are a number of points that I would like to raise, which include the following:

1. **Single Access Road.** The only access to the proposed high-density project is a single narrow road; there is no secondary access. The proposed development will add 100 cars coming and going out of Simon Ranch/Pavillion intersection that has two blind curves. The EIR fails to address much less mitigate the multiple potential safety hazards that will be created by the increased traffic at a single access point.
2. **Traffic.** The traffic generated by the proposed high-density project will create significant vehicular adversity; the streets in the neighborhood are sloped, very narrow and curvy. There are no sidewalks, and there are very few streetlights. Many neighborhood attracts hundreds of walkers, who enjoy early morning walks or late evening family excursions. Traffic from approximately 100 new resident drivers sharing the road with pedestrians will create a safety hazard for not only existing residents but for the many non-resident exercise enthusiasts. The EIR does not adequately address this issue.
3. **Easement.** A prescriptive easement arguably has been created by the property owners. Residents have walked through the Club regularly for decades through the 10 foot easement at the northeast portion of the property where neighboring residents can access the club property day or night. The stairs were built to ease access to the parking lot. Many use that same easement to do “regular routes” to and from our homes. Not one person working for the owner in our years of use ever took any action to prevent the pedestrian access. No signs were placed, no locking gates from the pedestrian easement were ever erected to prevent pedestrian traffic before or after club operating hours. As a result, a regular form of pedestrian travel and a reliance on this walking path has been created.
4. **Wildlife.** Nearly every night, I hear owls; I also see red tail hawks soaring in the sky everyday. These are just a few birds that nest and share our neighborhood. The EIR fails to address the affect of the proposed development on wildlife.
5. **Fire Safety.** Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is

insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. My family has evacuated our home twice in the last decade at the request of fire authorities. Each evacuation is stressful for the residents which is compounded by the fact that over 100 existing homes in Tract 3883 only have one access road to use. Adding another 37 homes exponentially increases the problem and potential danger. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.

6. **Recreation..** The EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
7. **Recorded Land Use Covenant.** Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning.
8. **Affordable Housing.** The project does nothing to improve affordable housing stock. The unit price point on the proposed development is over 1.3 Million and thus does not meet the definition of affordable housing.

I respectfully request that this project that solely benefits an outside developer/investor at the expense of the community be denied.

Sincerely,

David C. Holt, Esq.
The Holt Law Firm
1432 Edinger Avenue, Ste. 130
Tustin, CA 92780

(714) 730-3999 Main
(714) 665-3991 Facsimile

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Canning, Kevin

From: David Meredith <dmeredith@rocketmail.com>
Sent: Tuesday, June 28, 2022 1:07 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development (PA180034 / VTTM 18119)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning:

I am a resident at 11882 Simon Ranch Road since 2015. The tennis club is one of the main reasons we chose our house as a place to settle down. I strongly oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119). The project is out of character with the neighborhood and will increase traffic, a primary nuisance and safety concern for me since I live on Simon Ranch Road which is the only practical access to the location. I have the following objections to the EIR that was submitted for comment:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking and biking in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents’ safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club’s clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a “zoned” parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule

0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

David Meredith

Sent from [Mail](#) for Windows

Canning, Kevin

From: Piper, David <David.Piper@kyl.com>
Sent: Tuesday, June 28, 2022 9:40 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Tustin Hills Racquet Club - Draft EIR

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on the old, narrow, residential roads in the community. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have an adverse impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Regards,

David Piper

David D. Piper
Keesal, Young & Logan
(M) +1-714-235-1495
(O) +1-562-436-2000
(E) david.piper@kyl.com

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Canning, Kevin

From: Diana Neustadt <dneustadt@sbcglobal.net>
Sent: Tuesday, June 28, 2022 8:24 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development PA180034 / VTTM 18119 - Request for Project Denial

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am writing to express my opposition to the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119). There are many reasons that this development should not be permitted. I know that you are receiving lots of emails and letters , but I ask that you consider the human effect of this decision as it impacts many people and households who are opposed, just like mine. When I purchased my home several years ago, part of the appeal for me was to live in a quiet neighborhood with limited traffic. I paid more to live in this neighborhood because it checked the boxes for the factors that I considered most important.

I live down the street just a few homes away from the Tustin Racquet Club. Adding additional, high-density housing to the site where the Tustin Racquet Club is located will directly impact me and my family, along with many others. Having another 170-200 or more cars traveling in an area that only has one road is problematic for our quiet neighborhood and surrounding area. There are no sidewalks, signals, or crosswalks. The area has narrow, windy roads. I love my neighborhood and enjoy daily walks my dogs and children, one of which is a paraplegic. Adding additional housing and people to an area that was it was not designed or zoned for will result in poor safety conditions. I ask, if this was your neighborhood, would you want this project to happen?

The bottom line is that the owners who are proposing this development are doing so out of greed. Why would a person/group purchase land that was designated for recreational purposes with the intent to change that purpose? The answer is greed. They wish to profit on this project at the expense of the homeowners who live in this area under the disguise that they are adding much needed affordable housing.

You have the chance to help families like mine and protect neighborhoods like this from becoming overbuilt and dangerous. I ask that you consider the legacy that will be left if this project is approved. Increased dangerous traffic conditions is not a neighborhood that anyone

wants to live in or raise a family in. I ask that you assist my neighbors and me in denying this project.

Respectfully,

Diana Neustadt

2221 Liane Lane

Santa Ana, CA 92705

Canning, Kevin

From: Don Whitlow <don.whitlow@gmail.com>
Sent: Tuesday, June 28, 2022 2:26 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com; Lori Lewis Chew
Subject: OPPOSED to proposed Ranch Hills Planned Development (PA180034/VTTM 18119)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am writing to voice my opposition to the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119). While I am not a resident of the immediate neighborhood in which the Tustin Hills Racquet Club resides, I am a club member, and live nearby in the Fairhaven Eichler neighborhood, just a few miles away.

For me, the importance of the racquet club is in large part due to the rarity of similar communal space in the immediate area. While there are tennis courts of varying degrees of availability and quality, the racquet club provides not only better courts but also a source of camaraderie and community that brings people together. It's a valuable communal resource at a time when similar options are becoming less available.

I mentioned the fact that I live in the Fairhaven Eichler neighborhood earlier because as you may know, the three Eichler developments in the City of Orange have recently been attributed historic district status. This was due to a multi-year effort by residents and community members working with the municipality to put in place guidelines and benefits for maintaining the character of the homes within each neighborhood. It seems there are parallels to that effort and what the residents of the North Tustin neighborhood are working towards. As a community, they've come together and asked for consideration and assistance to maintain the characteristics of the neighborhood they've chosen to call home.

Further, I've lived in areas where high-density housing development was shoe-horned into parcels of land that were far too small for the number of homes that were built. It is irrefutable that the characteristic of those neighborhoods was altered for the worse as the new homes towered over the existing ones, blocking access to sunlight, imposing increased traffic on otherwise quiet streets, etc. From what I've seen, there is nothing in the development proposal to refute that there are far too many homes planned for the size of the land, or that it wouldn't negatively impact the immediate neighborhood and those of us that rely on the club, its amenities, and the open space it provides.

Density may be an answer to housing shortages, but when implemented in a way that doesn't consider the immediate wishes and charter of the community, it won't provide a net-positive to all involved, except maybe the profit-motivated land-developer who won't have to contend with the long-term impact of their short-sighted efforts.

All of the other well-documented concerns related to emergency response services, traffic, fire safety, property values, etc. have likely been better-addressed in other letters. I didn't want to miss an opportunity to voice my support of the existing club and the associated land-use covenant (which frankly should have negated the entirety of the debate in light of the neighborhood's wishes).

Please add my voice to those others opposing the rezoning and development of the racquet club land for any purpose other than its current use.

Thanks for your consideration.

Sincerely,
Don Whitlow

Canning, Kevin

From: Duane Jensen <djensen@catalinahome.com>
Sent: Tuesday, June 28, 2022 11:17 AM
To: Canning, Kevin
Subject: Tustin Hills Racquet Club Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – The developer mentioned he would meet with the local residence to discuss this plans. He never did this nor did he intend to. All he cares about is making a bunch of money and then moving on. He has no regard for the community. I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – *traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
2. **Fire Safety** – *Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
3. **Recreation / Open Space** – *the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.*
4. **Recorded Land Use Covenant** - *Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention. This land was intended for a tennis club and it*

was sold as a tennis club. The developer knew this and bought it anyway. Why would a rezoning even be considered? Where is the integrity of the county?

5. **Affordable Housing** - *the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions. This is all about making the developer as wealthy as possible.*

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Duane Jensen

President

Catalina Home

West Coast Office & Distribution Warehouse
14418 Best Ave
Santa Fe Springs, CA 90670
800-421-6723

Austin Texas Distribution Warehouse
16300 Central Commerce Dr. Building #6
Pflugerville, TX 78660
512-641-3031

Georgia Manufacturing Plant
1440 Duval Rd.
Chatsworth, GA 30705

Brands

www.catalinahome.com

www.artistryflooring.com

www.smartturf.com

Canning, Kevin

From: Heidi Brown <adventurebuddies@yahoo.com>
Sent: Tuesday, June 28, 2022 9:26 AM
To: Canning, Kevin
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- 1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
- 2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
- 3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.*

4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely, Emma Thureau

Canning, Kevin

From: Holt, Erica <holteri3@msu.edu>
Sent: Tuesday, June 28, 2022 7:13 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: THRC

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

1. **Recreation.** I have lived next to the Tustin Hills Racquet Club for almost 20 years. In my younger days, I was at the club nearly daily in the summer to swim or just hang out with my friends. I also had great times playing my friends while our parents played tennis and then we would all do a BBQ at the club. Today, I still see the same thing going on at club. I also still use the pool. The EIR fails to recognize that the community loses if this recreational open space disappears. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space and should be preserved for the community's use.
2. **Traffic.** The traffic generated by the high-density project will create safety issues. The morning traffic going down the hill (Pavillion/Simon Ranch/Browning) during the school year is already had to navigate, let alone adding 100 more cars from the 37 homes that will also be going to work and school. From my review, the EIR does not adequately address this problem.
3. **Fire Safety** – My family evacuated our home; this was a scary time for me and my family. There is only one way in and out of the proposed development. What if there is an accident that blocks the street? There is no secondary access for those residents to get out by car. This is an extremely dangerous matter and cannot be ignored with all of the fires we have had just in my 20 years living near the club. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.

Sincerely,
Erica Holt

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Canning, Kevin

From: Gilda Youdeem <gyoudeem@gmail.com>
Sent: Tuesday, June 28, 2022 9:57 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com; george@youdeem.com
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning

I am a long term resident of North Tustin and live on Omega right off of Browning which is down the street from this proposed development. I have lived here in this neighborhood for over 30 years and planned to die here due to the special features of this neighborhood...rural, beautiful, quiet and peaceful surroundings, the gentle hills and pleasant nature that make my long daily walks a joy!

I am extremely concerned about this proposed high density development actually impacting our way of life here in this neighborhood by:

1. Destroying that beautiful and open space entertainment, and recreation venue and replacing it with high density Irvine looking tract housing !!!!
2. Increase in traffic going in and out of the neighborhood using the only major route which is Browning. This street is already very hazardous due to people not respecting the speed limits and stop signs...just imagine increasing that by 30-40% !!!!
3. This entire neighborhood was designed in the 1960s for low density custom homes and changing that for higher density will put pressure on all county provided facilities such as sewer, water and gas lines...not to mention fire safety issues this will create !!!
4. Setting a precedent for all other home owners which large lots to want to subdivide their land and build more houses which will exacerbate this situation.

I ask you and all other officials who are reviewing this project, to please keep these concerns in mind when considering this proposal.

Appreciate it.

Canning, Kevin

From: Gorette Taghva <drgorette@leaplasticsurgery.com>
Sent: Tuesday, June 28, 2022 7:04 AM
To: Canning, Kevin
Subject: Tustin Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning

I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) because my daughter is a very talented tennis player and she goes there for tennis training almost every day with her coaches and her father. Her dream is to play at the Grand Slam someday and by taking away the racquet club, it would be much more difficult to fulfill her dream. Also, it would be a terrible idea for the following reasons:

1. **Traffic and Circulation** – *traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
2. **Fire Safety** – *Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
3. **Recreation / Open Space** – *the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.*
4. **Recorded Land Use Covenant** - *Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.*
5. **Affordable Housing** - *the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.*

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Attached are a couple photos of my daughter playing tennis at the club during her lessons and the annual tennis tournament.

Sincerely,

Goretti Taghva MD

--

Kind Regards,

Goretti Ho Taghva, MD, FACS
Board Certified Plastic Surgeon

20360 SW Birch St #180
Newport Beach, CA 92660
Office: 949-945-2168
Fax: 949-945-2218







Canning, Kevin

From: gstelson@cox.net
Sent: Tuesday, June 28, 2022 9:36 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Re-development of the Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning

I am writing to you regarding the proposed development of what is known as the Tustin Hills Raquet Club ("THRC"). It is my understanding that a developer wants to build 37 high density attached condominiums on the property. This type of development is substantially inconsistent with the surrounding neighborhood. I live less than a block from the proposed project and have lived in the neighborhood for 50 years, since I was 12 years old. As well, I practice dentistry 3 miles from the proposed development and have discussions regarding this project with many of my patients on a daily basis. No one I have talked to is in favor of this proposed development.

The proposed development would be the only one of its kind within miles. This type of re-zoning sets a dangerous precedence, especially without any input from the surrounding community. At no time were the residents in the surrounding neighborhoods contacted formally by the developer or the County of Orange to give formal input.

I have reviewed the latest EIR provided by the developer. Not only are there many incorrect assumptions, but a previous EIR used different methodologies which resulted in different potential outcomes. Therefore, it appears neither of these EIR's are accurate and only favor development not protection of the community or the environment.

I vehemently oppose this proposed redevelopment of the THRC.

The following are some of my major concerns:

1. Traffic dangers created by the proposed development will increase. There are four existing streets converging with blind intersections and adding a fifth street will only complicate an already dangerous situation. I raised three children on Liane Ln. and one of the steadfast rules for my family and most of my neighbors was that the children were not allowed to walk to the THRC by themselves. It is too dangerous to cross Simon Ranch Rd. from Liane Ln. Traffic from four directions cannot see pedestrians and there are no sidewalks in the neighborhood. As recent as June 4, 2022, a car traveling up Simon Ranch Rd. was unable to navigate the curve at the top of the hill and crashed into the yard of the house directly next to the access of the proposed development. Thank God there was no one walking in the area or in the front yard of the aforementioned home at the time of the accident. The most current EIR makes false projections with regards to the existing and future traffic dangers.
2. Due to the fact that the roadways accessing the entire area (Redhill Ridge) were constructed in the 1960's, they are narrow, winding and lack sidewalks. There is only one way in and one way out which creates limited ingress and egress during a catastrophic event. The area is less than a mile from a Very High Fire Hazard Zone and multiple times per year the neighborhood is asked to evacuate due to hillside fires. Adding another 100 or more residents would only complicate this situation.
3. There has been complete disregard for the recorded land use covenant. This covenant was executed to preserve the existing use into perpetuity, for the express benefit of the existing residents.

4. The THRC provides an outlet for social, outdoor and open space experiences. Although the THRC is "private", there are many non-members using the facility. Not only did I learn to play tennis at the THRC as a child, I was a member of their swim team for many years. As well, my children participated in these same experiences and attended many charitable and school events at the THRC.

5. The development of the property in the proposed manner only serves the financial interests of the developer and their investors. The proposed project adds nothing to the N. Tustin community or the County of Orange. The idea that this project will meet a housing shortage in N. Tustin is baseless. there is no access to public transportation and the area is not walkable to any type of commerce. The current price per square foot for residential listings for sale in N. Tustin exceeds \$700. The proposed development is comprised of residences up to 2500 square feet, creating a comparable sales price of close to \$2 million. This in no way benefits the community. As proposed, the project creates more risks for the community than benefits for the community. The proposed housing will not be affordable and may even decrease the property values of the surrounding neighborhood. The traffic risks are obvious and have not been accurately explored by the EIR. The risk of evacuating an additional 100 or more people will only become more difficult. As well, accessing the area during a catastrophe will only become more difficult.

But most of all, it is a ridiculous use of a valuable community asset, with the developer and their investors being the major benefactors not the community.

Thank you for taking the time to read my concerns. Please prevent this proposed development from moving forward.

Respectfully,

Gregory S. Telson, D.D.S.

2181 Liane Ln.

N. Tustin, CA 92705

Office:

14041 Prospect Ave.

Tustin CA 92780

Cell: 714-925-7731

Office: 714-544-2000

Canning, Kevin

From: jbhoppe@cox.net
Sent: Tuesday, June 28, 2022 10:02 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Save the Tustin Hills Racquet Club

Importance: High

Dear Mr. Canning,

My siblings and I were raised in North Tustin in the 70s and 80s, and the Tustin Hills Racquet Club was a home away from home for us. We are now all living in Tustin, raising our kids here, and we use the Racquet Club and its amenities often. It is one of the few landmarks we have here. There is no other tennis club in our city, and taking this away would be detrimental for many.

I am writing to respond to the Draft EIR for the PA180034 / VTTM 18119 - RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club ("THRC") property. The current zoning has been in place since the THRC was built in 1958, and changing the zoning would be catastrophic to the North Tustin community.

My family and I live in the Racquet Hill neighborhood and walk to the Club on a daily basis. The THRC offers numerous, valuable services to its members, our family, as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats, and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, I strongly oppose the proposed development to the THRC.

Thank you,

Jacqueline Hoppe
11632 Vista Mar

Canning, Kevin

From: James Ha <ha_man@yahoo.com>
Sent: Tuesday, June 28, 2022 1:27 PM
To: Canning, Kevin
Subject: Draft EIR for the PA180034/VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

This is in response to the Draft EIR for the PA180034/VTTM 18119 – Ranch Hills Planned Development.

I am opposed to **ANY** zoning changes to the Tustin Hill Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be catastrophic to the North Tustin community.

My family and I are residents of Orange County and are tennis players. The THRC offers numerous, valuable services to its members as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft IER does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. The proposed development would also have a huge impact on the wildlife that live in the area – coyotes, owls, bats, hawks, bobcats and wild parrots.

I have relied on the current zoning when purchasing my home here and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced one it is lost. I must strongly oppose the proposed development to the THRC and the negative precedent it will set for zoning changes.

Sincerely,

James Ha

Canning, Kevin

From: Janet Valdivia <janetvaldivia@cox.net>
Sent: Tuesday, June 28, 2022 4:28 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Proposed Ranch Hill Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning

Twenty six years ago, our family decided to leave a home that we loved because the neighborhood was becoming increasingly crowded and at times dangerous due to the increased number of residents' vehicles. Years of hard work and sacrifices afforded us to move to the pristine tranquility of Red Hill Ridge, North Tustin.

Now, that tranquility is being threatened and disturbed again by the greed of yet another developer whose only goal is to collect as much money as possible by building the proposed high-density condominium project, Ranch Hills Planned Development. They could not care less about the myriad of ways that their project can disturb and change the quality of life in our neighborhood.

The construction trucks thundering up and down our streets from sun down to sun set, making it not only difficult but dangerous for people to walk our beautiful streets. The noise and dust from these trucks will inevitably affect our health. This is only during the construction phase, which will most likely take years, regardless of what they tell us.

Once built, the community would have lost one of their premier recreation/sport centers. Goodbye tennis and pickle ball folks. No matter how the developers want to sugarcoat the issue, there will be a significant increase in traffic congestion and pollution. Allowing just two cars per unit built (there will be more for sure), represents a massive increase of traffic in our narrow residential streets which will inarguably affect negatively our way of life. We are not talking only the quality of our lives but also our safety. No matter what they tell us, we know better. Just imagine fire trucks trying to access homes in the upper ridges. Literally impossible with increased traffic. They tell us that we are not in a fire risk area. Really? With the current climatological changes, any spot can be considered a fire risk. They should read how recent fires devoured homes like matchboxes. Ultimately, it is greed vs quality of life and sanity.

Sincerely

Lino and Janet Valdivia

Canning, Kevin

From: Jeremy Chen <mrjeremychen@gmail.com>
Sent: Tuesday, June 28, 2022 11:22 AM
To: Canning, Kevin
Subject: Ranch Hills Planned Development (PA180034 / VTTM 18119)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hi Mr. Canning,

I am writing to offer you my input on Ranch Hills Planned Development (PA180034 / VTTM 18119). I would like to help you understand the impact that this development would have on me and my 2 1/2 year old son.

I live just a block away (0.2 miles) from the site of the proposed development. I have been residing there for the past 12 years. Prior to this, I have lived elsewhere in North Tustin.

Here is how the planned development will impact me and my family:

1. The development will add to existing fire risk as the development is so dense and this will add burden to our fire safety resources such as access roads, staging areas. There is only one road for entering and exiting our community (Simon Ranch Rd).
2. Adding so much more traffic to our roads will make our roads more dangerous. Our roads do not have sidewalks. The proposed development being so dense, will surely increase traffic and parking along the roads. This is a serious safety concern for an area with streets that are not well-lit and do not have sidewalks.
3. My family and I can no longer avail ourselves of the pedestrian access from Simon Ranch Rd to Racquet Hill Rd via the pedestrian access that the Racquet Club offers us. Without this walkway, we will be cut off from a large part of our community/neighbors (considering the geography here and lack of other viable pedestrian access to there).
4. My son will no longer be able to use the pool area of Tustin Hills Racquet Club to learn how to swim and be among so many of his friends and neighbors. We will lose a vital asset to our community. He will not longer be able to learn to play tennis there when he grows older. I had grown up going to summer camp in the racquet club.
5. The noise and pollution from the demolition and construction of the proposed development would negatively impact my 2 1/2 year old son for a significant period of time (I imagine it will take years) at a phase in his development when he is considerably vulnerable to this.

Also, I must add that though I have much respect for our civic institutions and leaders such as you, I worry about becoming disillusioned with the system as it appears the needs of a real estate developer are prioritized and served over the needs of the community that said developer seeks to profit from, so much so that zoning laws are being rewritten and so much was done without the county or developer seeking input from those who live in the immediate vicinity.

Please take my input into consideration. So far, no one has sought input from us. If it were not for our neighbors, we would not even know this planned development had been proposed at all.

Regards,

Jeremy Chen
2192 Liane Ln.

Canning, Kevin

From: Jewel Younglove <jewelyounglove@gmail.com>
Sent: Tuesday, June 28, 2022 8:53 PM
To: Canning, Kevin; kirkwatilo@gmail.com
Subject: Tustin racquetball EIR ISSUES AND IMPACTS

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Canning,

I am righting in regards to the preservation of the Tustin Hills Racquet Club. Please do not let this property be developed, it is a Jewel to our community. Our family deeply treasures this place, our children take swim and tennis lessons. It's a place our friends gather and our families play. To loose such a special place would be a huge loss for this community and we are begging to stop development. Please hear our requests.

Devoted community member.

Jewel Younglove
949-929-6465
18651 Fairwood lane,
North Tustin 92705

Canning, Kevin

From: Joe L <joelee26@gmail.com>
Sent: Tuesday, June 28, 2022 6:58 PM
To: Canning, Kevin
Subject: PLEASE Save the Racquet Club PLEASE

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

*I **vehemently** oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:*

We discovered our incredible neighborhood (we live on Salt Air Drive) over 10 years ago and we were fortunate enough to move into our home in late 2017. It is one of the most beautiful and quiet neighborhoods in Orange County and our young family, including three young kids, love it here. Even without this potential condominium development, our traffic is quite busy. We have no sidewalks and minimal street lights. We walk with our kids around our neighborhood every day. With 100 new residents and the traffic it would create, I fear for the safety of not only our kids but all the families that walk in our neighborhood. There is no way the EIR traffic study adequately addresses this concern of everyone that lives in this area.

I've already been through two fire evacuations and building a high density housing in our neighborhood will cause a serious threat to our safety. If you lived in our neighborhood, you would also absolutely reject this proposal based on safety alone. On some mornings when folks are leaving the racquet club at the same time, I wait several minutes trying to make a left turn from Salt Air Drive to Simon Ranch Road. If the Santa Ana winds were kicking up and we had a fire evacuation, there would be no way our residents would all be able to get to safety in time.

Our kids are signed up for tennis camp later this summer. The EIR fails to consider the loss of the incredible recreational facility we have for not only our community but for folks that love playing tennis and now pickleball. Local schools also practice tennis here. This site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

I think one of the most egregious violations is the recorded Covenant that runs with the Land between the residents of Tract 3883 and the developer because it is an issue with the neighboring HOA beneficiaries and was not part of the review process. The recorded land-use Covenant was executed to preserve its use into perpetuity for the express benefit of residents and not the Racquet Club owner or future developer. Accordingly, the use of this property belongs to the residents, not the Racquet Club owner or developer. Both the owner and Seller and Developer (Buyer) acquired the land with knowledge of this restrictive Covenant solely benefiting the community, which is reflective in the price paid by the Developer. That promise should be honored without the need for court intervention.

This project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Thank you so much in advance for listening to all of our comments on this very, very important topic for our community. We really, really appreciate it.

Sincerely,

Joe Lee

Re:Tustin Hills Racquet Club Property 27 June 2022

Dear Mr. Canning

I am John Fjeld and I moved into my new home at 11641 Ranch Hill in 1976. I have enjoyed living in Lemon Heights ever since. The Tustin Hills Racquet Club was an attraction for this neighborhood. Our boys learned to swim at the club and we later enjoyed playing tennis at the club. Another attraction for this neighborhood was the 1/2 acre minimum lot size for each home. This has been in the general plan for this area and should be maintained.

The Tustin Hills Racquet Club (THRC) is a recreation asset to this community and due to the limited parks in this area. The THRC should be maintained but definitely should not be replaced by high density housing. High density housing will increase traffic which is not designed for more traffic. Noise during construction is an unwanted nuisance.

Lemon Heights is a pleasant community of like minded people who live here because they enjoy quiet low density living in the hills. Several of our neighbors came here when we did and expected the General Plan to have meaning and protect our way of life. We still expect that.

Sincerely

Original signed by

John Fjeld
714-474-3070

Canning, Kevin

From: Kristie Holt MPH MCHES CLE ICCE <Kristie.Holt@atlantishealth.com>
Sent: Tuesday, June 28, 2022 9:27 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development Planning Application NO. PA 18-0034

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am emailing you regarding my strong opposition to the proposed redevelopment of the Tustin Hills Racquet Club (THRC). I moved to our home on Pavillion Drive, which is located directly adjacent to the entry of the THRC in November of 2003- exactly 11 days after our 3rd child was born. As a young mother of 3 children under the age of 6 I cherished having direct access to the club. As a family we played tennis, swam, exercised, socialized and attended many charitable and celebratory functions at the club over the last nearly 20 years. I have reviewed the Draft Environmental Impact Report (EIR). There are a number of points that I would like to raise, which include the following:

1. **Single Access Road.** The only access to the proposed high-density project is a single narrow road; there is no secondary access. The proposed development will add 100 cars coming and going out of Simon Ranch/Pavillion intersection that has two blind curves. The EIR fails to address much less mitigate the multiple potential safety hazards that will be created by the increased traffic at a single access point.
2. **Traffic.** The traffic generated by the proposed high-density project will create significant vehicular adversity; the streets in the neighborhood are sloped, very narrow and curvy. There are no sidewalks, and there are very few streetlights. Many neighborhood attracts hundreds of walkers, who enjoy early morning walks or late evening family excursions. Traffic from approximately 100 new resident drivers sharing the road with pedestrians will create a safety hazard for not only existing residents but for the many non-resident exercise enthusiasts. The EIR does not adequately address this issue.
3. **Easement.** A prescriptive easement arguably has been created by the property owners. Residents have walked through the Club regularly for decades through the 10 foot easement at the northeast portion of the property where neighboring residents can access the club property day or night. The stairs were built to ease access to the parking lot. Many use that same easement to do “regular routes” to and from our homes. Not one person working for the owner in our years of use ever took any action to prevent the pedestrian access. No signs were placed, no locking gates from the pedestrian easement were ever erected to prevent pedestrian traffic before or after club operating hours. As a result, a regular form of pedestrian travel and a reliance on this walking path has been created.
4. **Wildlife.** Nearly every night, I hear owls; I also see red tail hawks soaring in the sky everyday. These are just a few birds that nest and share our neighborhood. The EIR fails to address the affect of the proposed development on wildlife.
5. **Fire Safety.** Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. My family has evacuated our home twice in the last decade at the request of fire authorities. Each evacuation is stressful for the residents which is compounded by the fact that over 100 existing homes in Tract 3883

only have one access road to use. Adding another 37 homes exponentially increases the problem and potential danger. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.

- 6. **Recreation..** The EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
- 7. **Recorded Land Use Covenant.** Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning.
- 8. **Affordable Housing.** The project does nothing to improve affordable housing stock. The unit price point on the proposed development is over 1.3 Million and thus does not meet the definition of affordable housing.

I respectfully request that this project that solely benefits an outside developer/investor at the expense of the community be denied.

Respectfully,
Kristie Holt

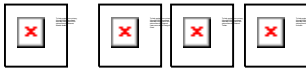
Kristie Holt MPH MCHES CLE ICCE

SVP Behavioral Science

T 714-334-4447

M

E Kristie.Holt@atlantishealth.com



Award winners:



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We do not intend to change our bank details. If you receive any communication that any of our bank details have changed, telephone us and speak to your contact at our office before transferring any funds. We do not accept responsibility for monies paid into a wrong bank account in any circumstances.

Canning, Kevin

From: Cox <leeweisbrich@cox.net>
Sent: Tuesday, June 28, 2022 4:28 PM
To: Canning, Kevin
Subject: Pls vote against Ranch Hill unwise proposed zoning changes

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

June 27, 2022

Sent to: Kevin.Canning@ocpw.ocgov.com

Dear Mr. Canning,

My family & I have been a resident of North Tustin since 2001. I can think of no more important local issue than stopping the imprudent development project that I vehemently oppose; the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- 1. Fails Safe Traffic and Circulation** – traffic generated by this high-density project will create significant adverse effects as our neighborhood streets are:
 - very narrow, have no sidewalks, with deep uncovered run-off ditches to the sides,
 - Many blind curves, significantly winding roads and minimal street lighting. Most residents enjoy jogging, walking and biking in our foothill community with their Children and pets, and all pedestrian activity occurs on these narrow, windy streets.
 - Traffic from approximately 100 new residents (and all those additional cars) will create a measurable safety hazard for existing residents, and the EIR erroneously did not adequately address this grave concern.
- 2. Fails Basic Fire Safety** – Red Hill Ridge was specifically designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress (on a steep grade no less) at Simon Ranch Road is insufficient to safely accommodate

the evacuation needs for an increased density project at this remote hillside location. Worse yet, this site is situated within $\frac{3}{4}$ ***mile of a Very High Fire Hazard Severity Zone***. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency. BTW, I have been evacuated 2x since 2001 for nearby fires, most recently in 2020. Fire in this area is not a conceptual matter.

3. **Loss of Rare Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players (and now Pickleball) are non-members. Children's swim classes at the club's pool are packed all summer long and a local tradition. Local schools use the facility for tennis practice and the club house for local fundraisers as well. *Did you know that every Sunday morning approximately 100 people use the club house as their church?* The County also fails to consider that the site is the last remaining parcel in North Tustin specifically zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. **Please take into consideration the scarcity factor here.** The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Well Documented, Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **False Claim of Affordable Housing** - the proposed project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.
6. **Preservation of Wildlife** – I invite you to be my guest and observe extremely active riparian action in the skies above the Club. The dozens of palm trees are home to eagles, hawks, parrots and a variety of bird life. This scarce open space allows for squirrels, rabbits, skunks, raccoons, opossums and coyotes to have a viable habitat.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request

the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Leslie Weisbrich

1092 Saint Vincent Place

North Tustin, CA 92705

(h) 1-714-368-0505

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Canning, Kevin

From: Marci Maietta Weinberg <mcweinetta@me.com>
Sent: Tuesday, June 28, 2022 11:23 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Fwd: County Draft EIR-North Tustin

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello,

Tustin Hills is unique and lovely in good measure because of the vibe thrown off old tree growth, winding roads and ranch style homes that dot the landscape. Before purchasing our Tustin home in 2005, my parents brought me from the east side of Orange for tennis lessons because of the beauty, peacefulness and quality of life Tustin offered-exactly why my husband and I returned here to purchase our family home.

Developing the club into a high density housing development would alter the very essence of what brought us and continues to attract new home owners to the area.

I don't need to restate what so many have said and what is outlined in the various documents filed in opposition. It's my gut feeling that what has drawn people to the area for over a half-century is the peacefulness of it, the trees, the low density and having the Club as a kind of centerpiece for the community. Taking that away for high density housing would just ruin the area. The need for housing is real, but this just is not the place.

Don't hesitate to call if you have further questions.

Respectfully,

Marci Maietta Weinberg
949-677-6097

Canning, Kevin

From: Marta Prietto O'Hara <martapriettoohara@gmail.com>
Sent: Tuesday, June 28, 2022 4:07 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Save the THRC

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I have lived in the THRC neighborhood since 1965 (with the exception of my college years out of the area. My family has had an open and active family membership since around 1970. I currently play tennis or pickleball 4-6 time per week and my grandchildren take swimming lessons at the THRC pool. I live exactly 6 houses away from the club now, on Pavillion, and drive into the entrance or right by it at least 2-3 times per day, and back by it in the opposite direction the same amount of times. To believe that there will be no significant impact on the surrounding neighborhood is, quite simply, not true. General reasons are indicated below. Specifically, there will be many more people driving up and down Simon Ranch Road with a proposed multi unit housing development. There will also be a significantly larger number of people walking, running and biking in our neighborhood. At present, since there are no sidewalks, the streets are curved, some blind spots and poor lighting, the risk of accidents is high. This will only with the development of many homes with only one way in and out. Additionally, THRC is one of the last properties zoned for recreation/agriculture, protected by the original covenant set forth to protect this open area for use by many people living in many cities across Orange County; not just the immediate neighborhood.

I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity

Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.

3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Marta Prietto O'Hara

Canning, Kevin

From: Martin Boost <martingboost@gmail.com>
Sent: Tuesday, June 28, 2022 2:42 PM
To: Canning, Kevin
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – *traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
2. **Fire Safety** – *Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
3. **Recreation / Open Space** – *the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.*
4. **Recorded Land Use Covenant** - *Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.*

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

*Sincerely,
Martin Boost*

Sent from my iPhone

Canning, Kevin

From: Melinda Anton <antongirls@gmail.com>
Sent: Tuesday, June 28, 2022 9:54 PM
To: Canning, Kevin
Cc: Kirkwatilo@gmail.com
Subject: Proposed Development of Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I have lived in North Tustin for 53 years since I was three months old. I am appalled at the proposed development of 37 high density attached homes at the Tustin Hills Racquet Club. This proposed development only benefits the developer and their investors. There is no benefit for the community. The proposed development is inconsistent with the surrounding neighborhoods. Adding 100 or more residents to an already built out area will only create more traffic, congestion, and access issues.

I vehemently oppose this proposed development.

Respectfully,

Melinda Anton
12791 Brittany Woods Drive
Santa Ana, CA 92705

Canning, Kevin

From: Mike Vukovich <mikevukovich@gmail.com>
Sent: Tuesday, June 28, 2022 8:23 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com; Alison Vukovich
Subject: Draft EIR for PA180034 / VTTM Hills 18119

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

We are responding to the Ranch Hills Planned Development Planning Application NO. PA 18-0034 Draft Environmental Impact Report (EIR). We are opposed to ANY zoning changes at the Tustin Hills Racquet Club. Changing the zoning would not fit within the character of the North Tustin community and be detrimental to the community as a whole.

The EIR does not accurately take into account the impact that the proposed 37 condos and likely 100+ new residents would have on noise and traffic on residential roads. There is only one and out of the Project with Browning Ave. the being the only main ingress and egress to the site...furthermore there are no public sidewalks around the Project site and many residents and children enjoy walking and biking through the neighborhood in the mornings and evenings. Increased traffic will cause a safety hazard.

We chose North Tustin to raise our children due to the character of the community, larger lots, and density. The proposed changes are inconsistent with the Orange County General Plan and will change the character and safety of the neighborhood.

The THRC is an important piece of the community for over 60 years and cannot be replaced once gone.

We strongly oppose the proposed development of the THRC.

Thank you,

Michael & Alison Vukovich

Canning, Kevin

From: Michael Yang <mikeusc@live.com>
Sent: Tuesday, June 28, 2022 10:23 PM
To: Canning, Kevin
Subject: Racquet Club Zoning

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Cannin:

I am a new resident on Salt Air Drive. My family (2 young children) moved to this area from Irvine to a quieter place where we can enjoy walks and participate at the Racquet Club in Tustin. With the lack of sidewalks and no streetlights, I find myself already walking cautiously to be out of oncoming traffic. If more homes were built to increase traffic flow, I know my family and I would be in harm's way during our walks. If additional cars were parked on these narrow streets, it would be a major safety hazard during any type of evacuation from fire or earthquake.

We have made many sacrifices to be able to live where we do now. Allowing a business to take away our last areas of recreational space is selfish and uncalled for. Please consider family life and generations of families (past, present, and future) before disrupting our neighborhood.

Concerning Resident

Michael Yang
714-838-8789

Canning, Kevin

From: Michelle Ronan <mronan@differencecard.com>
Sent: Tuesday, June 28, 2022 11:22 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Ranch Hills Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Canning,

Thank you for taking the time to read this. I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be really devastating to the North Tustin community.

Hands down this area is known and valued for it's large lot sizes and custom homes. Our neighborhoods are spread out and The Racquet Club has always been an added bonus not only for families to enjoy tennis and swimming, but also for residents in general who appreciate the quality and connectedness that the club offers to our special community.

The Racquet Club was purchased as recreationally zoned and therefore should stay that way – we are members of the Racquet Club and pay a healthy amount and from my knowledge it appears there are many others like us – I have a hard time believing that this facility that was bought under recreational zoning is not doing just fine financially. The overhead appears minimal and especially with the upgrades to pickleball courts the membership seems strong. For the County and our elected officials to change the zoning is one thing that should not be allowed but to change it and allow high density housing with 37 units is downright preposterous.

I have significant fire and Life Safety concerns for the traffic on these smaller windy roads and strong concerns about the resources required for police and firefighters in the event of an emergency.

I sincerely hope the County does the right thing by leaving the zoning in place.

Thank you for your consideration.

Michelle Ronan
Sales Consultant | West Markets
p. 949-554-8935 - The Difference Card



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Comment Letter 141 (Page 2/2)

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Canning, Kevin

From: Miguel Prietto, MD <mppmd1@gmail.com>
Sent: Tuesday, June 28, 2022 2:26 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development (PA180034 / VTTM 18119)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Canning,

As a North Tustin resident for over 35 years I strongly oppose the proposed Ranch Hills Development.

We residents are in a binding land use covenant that is there to preserve existing zoning and present use. How do you disregard and disrespect that promise?

Your proposal is very dense and does not at all reflect the area's present use.

Your proposed development would congest the area and promote safety hazards with regards to fire and driving.

Respect our homes.

Why should you be able to disrupt our homes and quality of life forever, and then you walk away?

Miguel Prietto

Canning, Kevin

From: Monique <gasquem@gmail.com>
Sent: Tuesday, June 28, 2022 11:36 AM
To: Canning, Kevin
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

As a resident of North Tustin, we oppose the new planned development as the min density of homes and spacious surroundings are the primary reason we moved to this area. If I wanted townhomes and high density on small plots of land, I would have chosen new Tustin or Irvine or south county. This area needs to be preserved. Cramming people into densely populated areas creates more problems.

Additionally, we don't need more housing we need nearby social activities that can bring communities closer together.

Thank you,
Monique

Sent from my iPhone

Canning, Kevin

From: myletruongmd@aol.com
Sent: Tuesday, June 28, 2022 3:44 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Kevin Canning;

My name is My-Le Truong, a resident at 2161 Salt Air Drive near the Racquet Club that is to be developed to Ranch Hills Planned Development.

I am very sad this [project was being planned that way. The impact of this project is tremendous for our community as it is analyzed and well explained in letters sent to you from my neighbors.

I strongly oppose this high-dense condominium development.

I hope you take our opposition into your careful consideration about this matter.

Sincerely yours,

My-Le Truong

Canning, Kevin

From: Robert <rpage2@cox.net>
Sent: Tuesday, June 28, 2022 11:39 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Objection to the proposed Development of the Tustin Racquet Club on your calendar

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning –

It is with very significant anger and disgust I write you today. The behind our backs maneuvering, by the developer and related parties, that has taken place to keep the community impacted out of the conversation has been obvious to our residents. The fact that the covenants and documents drafted with the creation of the club and its set asides could not be more clear. The fact that the community has not been fully engaged in the conversation, and even offers by others to buy this property to keep it as it is, have been ignored. This is a piece of property that has specific use, and was clearly designed with the cooperation of the land owner, developer, city, county, residents and all engaged, and yet today all that is largely being ignored without any real support from the community affected.

I agree with the general consensus of the community, the foothills homeowners association, and other interested parties. My family and I are vehemently opposed to the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – *traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern. The traffic plan for the community likewise is a very high risk plan should an earthquake, fire, or other issues arrive. A Single loaded street that runs throughout the entire community before exiting during a time of crisis just will not work. What if a tree blocks the access, or a fire truck blocks access, etc...the rest of the community can be blocked inside with few options for exit.*
2. **Lighting** - *Any review of this community and the racquet club has to include an analysis of the lighting and access for people coming thru the community. We DO NOT have street Lights. We do not have Sidewalks. We have high rates of speed down the hill by*

many. All of these factors with an even heavier traffic load increases the risks for those who frequently walk in our community. Has anyone done a study of the amount of foot traffic seen in the community, and how the increase in traffic load will impact and increase the risk associated with those who walk here frequently throughout the day. From folks walking their dogs, to kids coming home from school, to health nuts, we have heavy traffic in a poorly lit, high traffic, high speed, no sidewalk community and adding additional cars to that is not a benefit to safety by any means.

3. **Fire Safety** – As my family evaluates the fire safety needs of the community we see a significant risk of adding this number of homes to a single loaded street with no secondary access or exit points. Also the layout of the community itself compresses these additional vehicles into an already crowded single load street during times of crisis or fire. Other communities we have lived in have been required to have a secondary exit in case of fire, and there are NO PLANS for a secondary exit point at all for this project. Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
4. **Recreation / Open Space** – As community members affected by this project we along with others bought in this community due to the amenity being part of the community landscape. Many made the decision to move to this area because of the amenities of the Racquet Club and Tustin Golf Club, and that is not being considered at all as it will likely have a negative impact on the asset value and salability of the properties when this facility is no longer here. The next question to ask is won't this set a precedent for the future that if someone were to purchase the Golf Club and play the same games without the input from the community. I believe that this action being taken would open the door for that to even happen on this much larger property down the hill. The EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
5. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention. What is the point of formal agreements agreed to by all, and publicly disclosed throughout their purchase process? This should not

even be a conversation as it was settled, understood, and clearly detailed in all documents tied to that land.

6. **Affordable Housing** - *the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions. Nor do we want affordable housing affecting the community either.*
7. **School Safety** - *A reminder that just down Browning is an elementary school with very heavy traffic loads at various times of the day. We are very concerned that the level of added housing will likewise have a major impact down Browning affecting the risk analysis for these young children activities around the school at various times of the day.*

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few. I respectfully note that you are employee's of the citizens of this state, county, and city who are to perform their roles for the benefit of US, not a special interest groups looking to take advantage of the citizens your supposed to protect, and the communities your supposed to protect and support.

Please deny any of the applications submitted and end this long saga of an coniving developer and investor.

Sincerely,

Nancy R. Fowler
2152 Salt Air
Lemon Heights, CA 92705

Cell: 949-683-4404

email: nrfrocket@cox.net

<http://www.linkedin.com/in/nancyfowersalesleader>

Canning, Kevin

From: Nancy Watilo <nancywatilo@gmail.com>
Sent: Tuesday, June 28, 2022 7:09 PM
To: Canning, Kevin; Kirk's Cell US
Subject: Response to Ranch Hills Project Draft EIR

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – I oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. There is a covenant that runs with the land and the County has ignored this document stating it is a private matter between the land owner and residents of Tract 3883. I am a member of that tract that purchased with the knowledge of that document. I was a member of the Club for many years.
2. I have lived on Pavillion Drive for 45 years and raised my family and my children benefited from the recreational aspects provided by the Club. Removing the only recreational property from the area will reduce the overall residential lifestyle of the community, something which requires the EIR and decision making bodies to take into consideration.
3. A prescriptive easement has been created by the property owners. My husband and I have walked through the Club regularly for decades through the 10 foot easement at the northeast portion of the property where neighboring residents could access the club property day or night. The stairs were built to enhance ease of access to the parking lot. So many others have used that same easement to do our “regular routes” to and from our homes. Not one person working for the owner in our years of use ever took any action to prevent the pedestrian access. No signs were placed, no locking gates from the pedestrian easement were ever erected to prevent pedestrian traffic before or after club operating hours. In fact, there was a staff member living on property for years and my husband would fetch the newspaper from the top of the parking lot and take it to the gentleman daily. As a result of this knowledge of pedestrians using this route regularly, this route has been relied on as a regular form of pedestrian travel and a reliance on this walking path has been created.
4. The traffic on Pavillion Drive will be increased dramatically and will impact our way of life and property value. Trying to turn left from Salt Air heading towards Browning will become extremely challenging due to the sight distances and cars flying down from the Club location, more than they do now with construction traffic and service providers to the proposed development.
5. Another big concern is the fact that we are on water rationing and to add additional homes would create a huge demand for water that is already in short supply.

For these reasons, I am not in favor of this project.

Sincerely,

Nancy Watilo

[2331 Pavillion Drive](#)

[North Tustin](#)

Canning, Kevin

From: Nicky Westrup <nickywestrup@hotmail.com>
Sent: Tuesday, June 28, 2022 8:40 PM
To: Canning, Kevin; kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development (PA180034 / VTTM 18119) - EIR COMMENTS / OPPOSITION

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

REGARDING: PLANNING APPLICATION NO. PA 18-0034 (Proposed Redevelopment of Tustin Hills Racquet Club)

Dear Mr. Canning:

I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, winding streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern. In fact, just a few weeks ago a car jumped the curb and crashed into our immediate neighbors (2121 Valhalla Dr.) front yard on the corner of Valhalla and Pavilion Dr., which is directly adjacent to the entry driveway of the Racquet Club. The slope of the street in this area coupled with narrowness of the two-lane street (with no sidewalks) creates blind spots from various directions, bottlenecks and is a danger in its current layout. Adding an additional 100 residents will only increase the traffic and circulation hazard at the racquet club driveway location. In addition, this location, which is the access point to the racquet club, and the ancillary streets will be heavily impacted during an extended construction period and create a major hazard for the local residents.
2. **Fire Safety** – From a Fire Safety standpoint, this development would endanger the entire Red Hill Ridge Community and more specially families, like ours, who have homes directly abutting the racquet club property. Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¼ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention. This is a slippery slope, if the land use covenant is not honored Developers will tear down homes, split lots, and build

higher density housing throughout Red Hill Ridge and completely destroy the fabric of this neighborhood. The current deed restrictions were clearly established and agreed to by all property owners in this neighborhood. In fact, this is one of the main reasons our family moved to this area and should this restriction not be honored, we would likely sell and leave this neighborhood.

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

This development proposal is a perfect example of a wealthy developer with no ties to our community that is now attempting to modify the well planned and deed restricted uses of our neighborhood for the sole purpose of personal profit, with zero benefit to the community while significantly increasing traffic and fire safety hazards for the residents. We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of an outside party.

Best Regards,
Nicole Ghotbi
11882 Outlook Lane
Santa Ana, CA 92705

Canning, Kevin

From: PABLO PRIETTO <ppprietto@cox.net>
Sent: Tuesday, June 28, 2022 4:13 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: THRC

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents’ safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club’s clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a “zoned” parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents’ safety above the monetary gain of a few.

Sincerely,

Canning, Kevin

From: Pat Dreyer <pat.devex@cox.net>
Sent: Tuesday, June 28, 2022 11:52 AM
To: Canning, Kevin
Subject: Dreyer concerns regarding development of Tustin Hills Racquet Club property

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hi Kevin ~

I live at 2291 Pavillion. Recently the roads in our neighborhood were resurfaced. When Pavillion and Simon Ranch were down to one lane and workers had to continuously stop traffic on each side for a couple minutes to let the other side through I was amazed how quickly the line of cars waiting piled up. We already have a disadvantage in all getting out if there were a fire or some sort of disaster. Adding more homes would make it impossible and cause casualties. Who would then be liable, the developer or the committee that allows this as it will be well documented that this was opposed. And, this is only one area that would make our neighborhood unsafe.

Since moving here 10 years ago, when we were in our early fifties, we went from being one of the younger couples on our street to one of the oldest. It's been wonderful to see and hear all the children of the young families that have move in around us. Our neighborhood doesn't have sidewalks so I constantly see parents outside supervising their young children riding bikes or scooters and older children riding bikes and walking their dogs. Most of these young families moved here because of the activities the tennis club would provide - swimming, tennis, pickle ball. Without these activities the streets will be used even more for recreation.

More traffic isn't even the most dangerous issue. The amount of overflow parking onto our streets from these 37 homes will make it extremely unsafe for the children and all the other walkers, bikers, etc. These new homes will have short driveways and limited street parking. The new residents' larger vehicles, extra vehicles and guest parking will most definitely flow out onto our neighborhood streets, mostly Pavillion, where so many young children now live. A car pulling out from the side of a street is much more unsafe for pedestrians/bikers than a car pulling out of a driveway. When cars back out of a driveway the drivers are more cautious and the people on the street have ample time to react. Cars parked on the side of the street are also dangerous when the driver exits the vehicle. People usually take a few moments before getting out, first looking at their phones or gathering things, and then randomly open doors into people, bikers, etc. Having no street lights also makes the additional cars unsafe for the many people who walk their dogs after dinner.

I was originally open to hearing what this developer had to say at the first meeting, years ago at the tennis club, when he spoke to the residents. He said he wanted to work with us to create something that fit well within our community. He said he was focused on a win-win for everyone yet has not taken the time to even listen to our concerns let alone try to work through them with us. It appears this developer was and is only saying whatever it takes to cram this through and make as much money as possible. How realistic is it that these two-story homes are for elderly people who want to stay in the community but downsize? We moved into our ranch style home in preparation for our older years where a single level would eventually be a requirement.

We are not fighting because we don't want more wonderful people in our community or we're worried about monetary things like our property value. The proposed project would not be safe. We want to feel safe. It is

quite obvious this developer is placing his financial gain over our lives, our children's lives and the future residents' lives if they should ever need to get out quickly.

Pat Dreyer

Canning, Kevin

From: Patrick Ross <pkross223@gmail.com>
Sent: Tuesday, June 28, 2022 12:32 PM
To: Canning, Kevin
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Canning,

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- 1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
- 2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
- 3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.*
- 4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.*

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Patrick Ross

North Tustin Resident

Canning, Kevin

From: Paul Sowa <psowa356@gmail.com>
Sent: Tuesday, June 28, 2022 5:32 AM
To: Canning, Kevin
Cc: Kirk Watilo
Subject: STOP the THRC

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Kevin,

My wife and I moved to the Lower Lemon Heights in the North Tustin area after living in Irvine for 30 years. We have experienced first hand what increased building and traffic did to our neighborhood in Northwood.

We have worked very hard our entire lives and saved so we could move to North Tustin and enjoy the decreased housing density and reduced traffic in our new neighborhood. We enjoy walking our dog on Simon Ranch, Salt Air, Browning and the surrounding streets.

In the last two years, we witnessed the increased Construction Traffic on Browning and Simon Ranch as the city of Tustin was building a new water tank on the corner of Valhalla Drive and Outlook Lane. There were many trucks on a daily basis traveling up Browning then Simon Ranch before turning left onto Valhalla Drive and then a short block to the corner of Outlook Lane. This location is one block from the THRC. If the Racquet Club redevelopment gets approved there will be far more construction trucks, cars, etc. for 2 to 3 years plus the added cars and trips from the high density development thereafter.

In addition, in case of a fire or earthquake (which are likely) a high density development would make it more dangerous for evacuation since there is only one narrow vehicular access point in and out of the community (Simon Ranch Road) and no sidewalks for pedestrian evacuation.

The EIR failed to take into consideration the compatibility issues relative to North Tustin's community and preserving its distinctive rural quality. If the zone gets changed to R2 (5000) the density will be 3 to 4 times of the surrounding community. We didn't move here to live in a high density area!

The THRC is the last remaining parcel in North Tustin zoned for recreational open space which is a recreational facility for North Tustin and all communities in the area. The THRC provides tennis, pickle ball, swimming, swimming lessons, physical fitness and personal training. If THRC leaves, then all the members and non-members will have to migrate and drive to other locations which will impact other community parks.

There is a recorded restrictive land use covenant for the THRC executed to preserve its use in perpetuity to solely benefit the community and not the tennis club or the developer. Do we really need a developer from the outside to destroy this recreational space at the community's expense?

Please do not allow this redevelopment to go forward which will destroy the character, charm and feel of North Tustin Hills.

Regards,

Paul and Mary Sowa

12051 Skyway Drive

Santa Ana, Ca 92705

Canning, Kevin

From: Paul Weisbrich <pweisbrich@dadco.com>
Sent: Tuesday, June 28, 2022 10:14 AM
To: Canning, Kevin
Cc: leewisbrich@cox.net
Subject: Pls vote against Ranch Hill unwise proposed zoning changes

Importance: High

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

June 27, 2022

Sent to: Kevin.Canning@ocpw.ocgov.com

Dear Mr. Canning,

My family & I have been a resident of North Tustin since 2001. I can think of no more important local issue than stopping the imprudent development project that I vehemently oppose; the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Fails Safe Traffic and Circulation** – traffic generated by this high-density project will create significant adverse effects as our neighborhood streets are:
 - very narrow, have no sidewalks, with deep uncovered run-off ditches to the sides,
 - Many blind curves, significantly winding roads and minimal street lighting. Most residents enjoy jogging, walking and biking in our foothill community with their Children and pets, and all pedestrian activity occurs on these narrow, windy streets.
 - Traffic from approximately 100 new residents (and all those additional cars) will create a measurable safety hazard for existing residents, and the EIR erroneously did not adequately address this grave concern.
2. **Fails Basic Fire Safety** – Red Hill Ridge was specifically designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited

lighting, and single access point). Furthermore, the single ingress/egress (on a steep grade no less) at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location. Worse yet, this site is situated within $\frac{3}{4}$ ***mile of a Very High Fire Hazard Severity Zone***. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency. BTW, I have been evacuated 2x since 2001 for nearby fires, most recently in 2020. Fire in this area is not a conceptual matter.

3. **Loss of Rare Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players (and now Pickleball) are non-members. Children's swim classes at the club's pool are packed all summer long and a local tradition. Local schools use the facility for tennis practice and the club house for local fundraisers as well. *Did you know that every Sunday morning approximately 100 people use the club house as their church?* The County also fails to consider that the site is the last remaining parcel in North Tustin specifically zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. **Please take into consideration the scarcity factor here.** The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Well Documented, Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **False Claim of Affordable Housing** - the proposed project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.
6. **Preservation of Wildlife** – I invite you to be my guest and observe extremely active riparian action in the skies above the Club. The dozens of palm trees are home to eagles, hawks, parrots and a variety of bird life. This scarce open space allows for squirrels, rabbits, skunks, raccoons, opossums and coyotes to have a viable habitat.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and

PROTECT residents' safety above the monetary gain of a few.

Sincerely,

A handwritten signature in black ink that reads "Paul Weisbrich". The signature is written in a cursive, flowing style.

PAUL T. WEISBRICH

1092 Saint Vincent Place
North Tustin, CA 92705
(h) 1-714-368-0505

D.A. Davidson Companies Disclaimer -- 2022-06-28

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Canning, Kevin

From: Peter Gillin <pdg@morganskenderian.com>
Sent: Tuesday, June 28, 2022 2:43 PM
To: Canning, Kevin; 'KirkWatilo@gmail.com'
Subject: Rezoning THRC

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Canning,

My name is Peter Gillin and I live at 11931 Marble Arch Dr., Santa Ana, CA, 92705. My family has lived in North Tustin for 9 years. This community is our home. We have been members at THRC for 8 years. My wife plays tennis at THRC every week. I swam at the THRC pool yesterday. It is a beautiful facility and I enjoy using it.

However, as much I love THRC, I also support individual property rights. I support the rezoning of the club and am opposed to onerous zoning requirements that impose limitations on these rights. If the owner of the club wants to rezone it, he should be able to do so.

Moreover, the neighborhood around THRC is incredibly wealthy and club serves as an amenity for the residents. Relative to the market value of the land, the club members pay monthly dues that are a pittance. So, the members get to use a valuable asset for nominal monthly dues. Logically, the members would like continued use of THRC. Therefore, they are sending you emails about how the narrow roads won't allow for fire trucks and disturbing the semi-rural nature of the community. The reality is that the members had the chance to buy the club during 2019, but were unwilling to do so. Now the members will have to live with and accept that decision.

You may have noticed that our state has a housing shortage. The construction of 37 new homes will make a small, but positive, impact on the housing shortage. California doesn't have a severe shortage of places to play tennis. If THRC is closed, the members may drive 2.2 miles to the Tustin Sports Park.

Finally, on a personal level, it is a matter of being intellectually consistent in my opposition to NIMBY-ism. You see, I own mobile home parks. The owners of the neighboring properties hate my properties and lobby their elected officials to change the zoning to allow for a more upscale use. In order for my properties to continue in their existing use, I have to fight against NIMBY-ism. Therefore, it would be hypocritical for me to fight against NIMBY-ism in another city but

embrace it in North Tustin. In the case of THRC, despite my person enjoyment of the property, I support the rezoning of the property.

Thanks for taking the time to read my comments, Peter Gillin

Canning, Kevin

From: psg@cox.net
Sent: Tuesday, June 28, 2022 7:28 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: NO RE-ZONING! - Shame on you TRACY AND DAVID BEAUCHAMP!

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

Please be advised that I, and my local extended family of 16, adamantly oppose ANY zoning changes at the Tustin Hills Racquet Club ("THRC") property. How can this possibly even be an issue!? **SHAME ON YOU, Tracy and David Beauchamp!**

The current zoning has been in place since the THRC was established in 1958! Any such changing of its zoning should NEVER be allowed. Zoning is the agreed upon use for all to obey and establishes the property use for all to rely upon. 1000's of local families have made, or will make, important residential living decisions based upon zoning in the area. In this case it is so clear that 100% of ALL residents (including many other families that regularly use the recreational facility in nearby Tustin, Santa Ana, Irvine, Orange, Villa Park), and local government officials, oppose the sheer greedy and selfish actions of the near billionaires Tracy and David Beauchamp. How could anyone possibly endorse this hostile aggressive, land-stealing PUTINish action? How can these out of the area, unaffected heartless soles be allowed to rob a community of 1000s of families of their recreational treasure? This selfish exploitation of a government loophole, against the unanimous will of the people, must simply be stopped! **SHAME ON YOU, Tracy and David Beauchamp.**

I am 58 year old now. My parents moved here in 1972 where they still reside. They raised me and my two siblings here where we attended local Red Hill and Arroyo Elementary schools, Hewes intermediate and Foothill High School (Class of 1981). I have lived a blessed life, which included bringing my wife and raising my two children here in the very same area, and in the same schools that I once attended (FHS class of 2017 & 2018). My brother returned also and raised his family of 6 nearby. Together, the 16 Griswold's have collectively attended over 100+ special events at the THRC including weddings, fundraisers, Celebration of Life services, birthdays, graduations, Anniversaries and sporting team celebrations over the last 50 years. The THRC has been a huge part of the community, and my family's life for several generations. **SHAME ON YOU, Tracy and David Beauchamp.**

The forced re-zoning, "against the will of the people", land-stealing, aggression must not be allowed to prevail. It just isn't right! And now Tracy and David are playing the SN 330 card to demolish the community facility to build 37, non-conforming >\$1M condos!! This act of pure greed and selfishness should be deemed a crime. The late great philanthropists Robert and Dorothy Beauchamp were great people and were all about family and children. They are certainly churring as they watch their son, and daughter-in-law, selfishly invest their inheritance in such an anti-family and anti-children cause. **SHAME ON YOU, Tracy and David Beauchamp.**

Please request that Tracy and David reconsider their actions and think of the so many families and children that will/would be forever negatively affected. Please ask them to reconsider their Re-Zoning efforts by

simply preserving the recreational treasure as intended for the future 1000s of families and children that will continue to enjoy it, just as so many have over the last 64 years.

Thank you,

Phillip Griswold

Canning, Kevin

From: Richard Hoppe <rthoppe@cox.net>
Sent: Tuesday, June 28, 2022 2:20 PM
To: Canning, Kevin
Subject: Save the Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

Our granddaughters learned to ride bikes in the THRC parking lot. Our granddaughters learned how to play tennis at THRC. Our granddaughters learned to swim at THRC. Our granddaughters love walking down the street to get a snack from THRC. We have loved watching my son's family grow up at THRC. Personally, we know Tracy and David Beauchamp and have spent lots of time at their China Cove house in Corona del Mar with their son, Brady, and his other siblings. We are good friends. They are very nice people, philanthropic, and caring but they don't "need" this development. It will not change their lifestyle one single bit. There is a reason why my son and his family moved to Racquet Hill, and that reason was not to live next to condos/PUD housing.

We are writing to respond to the Draft EIR for the PA180034 / VTTM 18119 - RANCH HILLS PLANNED DEVELOPMENT. Please be advised we are opposed to ANY zoning changes at the Tustin Hills Racquet Club ("THRC") property. The current zoning has been in place since the THRC was built in 1958, and changing the zoning would be catastrophic to the North Tustin community.

My wife and I in Corona del Mar and our son's family are residents of Orange County and more particularly the Racquet Hill neighborhood. The THRC offers numerous, valuable services to its members, our family, as well as to the community as a whole. More importantly, this land provides valuable, open space which is extremely limited in this part of the County. The Draft EIR does not accurately take into account the impact that the proposed 39 condos and likely 100 new residents would have on traffic on these residential roads. Further, it does not accurately take into account the amount of water, firefighting and police resources that will be required to service this new dense development. This proposed development would also have a huge impact on the wildlife that live in this area - coyotes, owls, bats, hawks, bob cats, and wild parrots.

North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here, and the current proposed changes are inconsistent with the Orange County General Plan. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost. Accordingly, we strongly oppose the proposed development to the THRC.

Thank you,

Carol and Rich Hoppe
1522 Seacrest Drive, Corona del Mar, CA 92625

Canning, Kevin

From: Roxie Bryant <roxieraebryant@gmail.com>
Sent: Tuesday, June 28, 2022 6:44 PM
To: Canning, Kevin
Cc: Richard Nelson; kirkwatilo@gmail.com
Subject: EIR Tustin racquet club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello,

I wanted to email my opposition to the current proposed plan for condos to replace the racquet club. Multi family development poses a significant risk due to the extreme high fire danger of this North Tustin area, due to the vegetation, location near the Cleveland National Forest that burns every year, location near Peters Canyon, lack of fire trucks and stations for unincorporated North Tustin, lack of streets wide enough for safe access in and out and lack of number of exit points. Placing higher risk multi family homes in the middle of North Tustin increases the fire risk for all of the residence in North Tustin. Also individuals who purchase these condos will likely not be able to purchase condo insurance due to the high risk combination of multi family and wildfire risk, which will leave these condos uninhabitable and lowering the home values in North Tustin. I was turned down by over 25 different insurance companies due to the high fire danger. Please do not allow multi family development on the Tustin racquet club property.

Roxanna Bryant
Resident of North Tustin
Member of the North Tustin Fire Safe Council

Canning, Kevin

From: Shawn Ghotbi <shawnghotbi@hotmail.com>
Sent: Tuesday, June 28, 2022 4:29 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development (PA180034 / VTTM 18119) - EIR COMMENTS / OPPOSITION

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

REGARDING: PLANNING APPLICATION NO. PA 18-0034 (Proposed Redevelopment of Tustin Hills Racquet Club)

Dear Mr. Canning:

I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, winding streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern. In fact, just a few weeks ago a car jumped the curb and crashed into our immediate neighbors (2121 Valhalla Dr.) front yard on the corner of Valhalla and Pavilion Dr., which is directly adjacent to the entry driveway of the Racquet Club. The slope of the street in this area coupled with narrowness of the two-lane street (with no sidewalks) creates blind spots from various directions, bottlenecks and is a danger in its current layout. Adding an additional 100 residents will only increase the traffic and circulation hazard at the racquet club driveway location. In addition, this location, which is the access point to the racquet club, and the ancillary streets will be heavily impacted during an extended construction period and create a major hazard for the local residents.
2. **Fire Safety** – From a Fire Safety standpoint, this development would endanger the entire Red Hill Ridge Community and more specially families, like ours, who have homes directly abutting the racquet club property. Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¼ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention. This is a

slippery slope, if the land use covenant is not honored Developers will tear down homes, split lots, and build higher density housing throughout Red Hill Ridge and completely destroy the fabric of this neighborhood. The current deed restrictions were clearly established and agreed to by all property owners in this neighborhood. In fact, this is one of the main reasons our family moved to this area and should this restriction not be honored, we would likely sell and leave this neighborhood.

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

This development proposal is a perfect example of a wealthy developer with no ties to our community that is now attempting to modify the well planned and deed restricted uses of our neighborhood for the sole purpose of personal profit, with zero benefit to the community while significantly increasing traffic and fire safety hazards for the residents. We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of an outside party.

Best Regards,
Shawn Ghotbi
11882 Outlook Lane
Santa Ana, CA 92705

Canning, Kevin

From: Stacy McKellar <stacy4re@gmail.com>
Sent: Tuesday, June 28, 2022 7:21 AM
To: Canning, Kevin
Subject: SAVE OUR COMMUNITY!!!!

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning –

I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- 1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal street lighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
- 2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
- 3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.*
- 4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.*

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Stacy McKellar

Cowan Heights Resident since 2009

Canning, Kevin

From: Sue Prietto <sueprietto@gmail.com>
Sent: Tuesday, June 28, 2022 7:40 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

*Sincerely,
Sue Prietto*

Sent from my iPhone

Canning, Kevin

From: alma cogger <almacogger@yahoo.com>
Sent: Wednesday, June 29, 2022 4:21 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Ranch Hills Planned Development (PA180034 / VTTM 18119)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Alma Cogger

2132 Salt Air Dr

Santa Ana, CA 92705

714-390-1506

Dear Mr. Canning,

My Name is Alma Cogger and I reside at 2132 Salt Air Dr. I would like you to know that as a community, we are all well aware the negative affects a new development will bring to the tiny Red Hill Ridge community and surrounding areas. I have lived here for approx 20+ years, and in that time, I have seen an increase in vehicle traffic with in this community. I have become more acutely aware of this increase as I am usually driving around doing errands or driving my son to school. The intersction of Simon Ranch Road, Browning and Beverly Glen is currently an already extremely busy intersection to which, I approach with caution. Many times I witnessed people failing to stop in any direction and with a blatant disregard for the signage, just simply drive on through the intersection. This is a big issue as it is. One that directly poses a threat to myself, my family, my neighbors and or community. Can you please let me know how increasing housing in this area with this proposed development would help the issue? As I see it, adding to the population and therefore adding more vehicles to this area will just exacerbate this situation. The EIR does not address traffic safety concerns from increased traffic volume and instead falsely suggests that traffic volume would actually be decreased as a result of the Project.

I specifically moved to this area based on the rural environment that the Red Hill Ridge area provided. An environment that now is being threatened by the addition of proposed housing. More housing to this area will not only impact our roads and traffic, but will also impact our surrounding schools. This proposed housing will further impact the already heavily burdened local schools and deplete the resources for our already large student population.

Years ago, we rarely had any issues of fire evacuations. Seems like that is no longer the case. Every year, this area is faced with voluntary, and in some cases, mandatory fire evacuations. The Red Hill Ridge area only has one point of entry/exit. Adding more people/traffic to this area is negligent in the sense that you are not only endangering the current area residents but you are now willing to place the new residents in harms way. This seems like an unfair situation for either party to be placed in.

It is my sincerest hope that the tennis club remain as it is, but please know that should the plans proceed, that we, the community, together, will continue to oppose and advocate against any such proposed change. For all of the above reasons, I respectfully request that the County deny this Project.

Sincerely,
Alma Cogger

Canning, Kevin

From: Amy Jensen <amyjensen2325@gmail.com>
Sent: Wednesday, June 29, 2022 2:28 PM
To: Canning, Kevin
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am writing to you to voice my opposition to the new development proposal in my neighborhood. As a mother of a Foothill High School tennis player who both trains and works at the tennis club, I am so disappointed that our land use covenant is being completely disregarded. Our family chose this neighborhood 17 years ago partly due to the proximity of the tennis club and the land use covenant that protected it from development.

I am vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – *traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
2. **Fire Safety** – *Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¾ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
3. **Recreation / Open Space** – *the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on*

residentially zoned land. The County of Orange sets a “zoned” parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Amy Jensen

2325 Pavillion Drive

Santa Ana 92705

Canning, Kevin

From: anita sinha <anita.sinha@gmail.com>
Sent: Wednesday, June 29, 2022 6:46 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Tustin hills racquet club destruction

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr Canning,

I am vehemently opposed to the proposed housing development project at the tustin hills racquet club. My family moved to the racquet hill neighborhood 7 years ago in order to escape the overwhelmingly dense and congested atmosphere of Irvine. The thought of greedy developers turning this special area into another cookie cutter development is horrific.

Additionally, the statement from the developer that the new high priced multistory housing units will serve a needed purpose is ridiculous as no seniors would live in such a place.

The increased traffic and congestion along with ever increasing fire risk puts our community at danger and it is concerning that the county would sacrifice the safety of its tax paying residents in order to line the pocket books of developers.

Our community will fight this effort tooth and nail in order to continue to have a safe and beautiful environment for everyone from the youngest children to the elderly-all of whom reside here harmoniously.

The only correct action at this point is to squash this project.

Anita Sinha

Canning, Kevin

From: Barry Kentrup <barke13@gmail.com>
Sent: Wednesday, June 29, 2022 6:20 PM
To: Canning, Kevin
Subject: EIR

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I sent this document on 28 June 2022 and again on 29 June 2022 and it was returned to me. By my reasoning this is the same as having an envelope returned by the post office. I believe you should consider this even though it is being sent after 5 pm on 29 June 2022.

The Executive Summary states very clearly that this project is NOT in accordance with the General Plan due to the inconsistency with the density allowances.

1.4 Objective 3 The proposed plan DOES NOT meet this objective. I have driven past this parking lot very many times over the last 35 years and seldom have I seen more than 20 vehicles. To consider that 37 homes with 4 parking spots per unit will result in LESS traffic is unacceptable. Paragraph 4.15.1 states, in part, that 349 daily trips occurred on APR 15, 2021. This test should be repeated, the number is WAAAY too HIGH!

Page 4.10-4 addresses the Restrictive Covenant. For the County to take the position that they are NOT a party to this Covenant is not correct. The Covenant was filed and recorded by the County. At that time the County became a party to the Covenant. The County's failure to

recognize its responsibility to protect the citizens of tract 3883 is unacceptable.

Table 4.13-1 reflects the number of students for 37 three bedroom homes to be only 14. This figure is unbelievably LOW. The burden on local schools will be much higher.

4.14 The Racquet Club offers recreational space to the residents of this community. This project REMOVES recreational space from this area, it is not a situation which meets the allowance for a developer to pay in-lieu for damage to spaces. This development DESTROYS valuable recreational space.

I am intrigued by how wastewater will be connected to the line which currently serves Pavillion Dr. I assume this will be accomplished due to an easement which does not include the County...easement vs covenant... same same.

TRAFFIC Browning is completely stalled when school is let out. I can imagine an EMERGENCY evacuation in this neighborhood with an additional 100+ vehicles. There are no sidewalks in this neighborhood so an increase in vehicles brings car vs human contact to a higher probability of occurrence.

Mr. Canning please stop this developer from damaging the property values of the owners of tract 3883 by building this future slum in the middle of our neighborhood. His personal enrichment is the ONLY benefit of this project.

Sincerely,
Barry Kentrup

--

Respond to Barke@pobox.com

Canning, Kevin

From: byrdyc@cox.net
Sent: Wednesday, June 29, 2022 4:34 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: PA180034 / VTTM 18119 - Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning:

We are writing to you in response to the Draft Environmental Report dated May 2022, for the proposed Ranch Hills Planned Development Project, to express our strong opposition. The Developer's, Ranch Hill Partners, L.P., blatant disregard for the existing homeowners' concerns is infuriating.

First and foremost, the proposed development will add substantially more traffic to the narrow two-lane roads such as Salt Air, Pavilion, and Simon Ranch Road, as well as Browning and Beverly Glen. This is a huge concern relating to Fire/Life Safety because there is only one way in/out of this neighborhood. With the constant droughts and severe fire hazards over the past years, there have been at least two voluntary evacuations and one mandatory evacuation in the seven years of living on Salt Air. The Project will only add an unnecessary hazard for safely evacuating in case of a fast-moving fire or other natural disaster. The narrow streets will also be less safe when walking due to the added vehicular traffic.

We walk in this neighborhood daily and use the "Pedestrian Access" on the Tustin Hills Racquet Club property to get to Racquet Hill Road in lieu of going up Skyline, as it was suggested in the EIR, because it is a lot safer. The Project proposes to eliminate this access and the only Open/Recreational Space within a safe walking distance of our residence. While it may not be a park, it provides us with the opportunity to use it for recreation and an asset to my neighborhood.

This Project does not address the "shortage of housing in the North Tustin community" by adding high density housing in this area, but instead the Developer's greed at the cost of homeowners such as our hardworking family. This Project would be taking away the unique characteristic and feel of this neighborhood by forcing us to accept the cancerous monstrosity that his Project is. We understand that there might be need for housing, but this "island of site" is not the location for high density housing as it creates unsafe conditions to the existing residents. This planned development only benefits Ranch Hills Partners, L.P, we strongly urge the County to deny this Project, and protect our property rights and open/recreation space for the safety of this community.

Sincerely,

Bertha Cerda
2111 Salt Air Drive
Santa Ana, CA 92705
714.343.3791

June 29, 2022

Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
P.O. Box 4048
Santa Ana, California 92702-4048

Re: Ranch Hill Partners EIR

Dear Mr. Canning,

Thank you for the opportunity to comment on Ranch Hills Planned Development (PA180034 / VTTM 18119) EIR. We recognize developments of this nature are always difficult and challenging to assess what is in the public's best interest. Unfortunately, the conclusions reached in this EIR are one-sided, advantageous to the developer and clearly not in the interest of the surrounding community. Stepping back from all of the technical objections, at a simple level, how can the County justify building 37 townhomes/condos on a piece of property surrounded almost entirely by a community with single-family, mostly single story homes on a half of an acre of land. There are no arguments that can be made that would support this development as not being anything other than extraordinarily out of character for the community and all of the arguments put forth in the EIR simply ignore the fact that the Tennis Club is an important part of the community valued by the local residents and those outside the immediate area. The negative impact to the greater community by removing such a significant recreational facility is tremendous and cannot be undone should this development move forward.

Having reviewed the EIR, I have the following objections to the conclusions reached, mostly due to insufficient study or inaccurate data.

- 1. Project Objectives** - The project objectives have been carefully crafted to lead to a favorable conclusion for the developer. However, if the underlying purpose of the project is, "to increase housing units in the North Tustin community," it seems there are other projects that would meet that purpose. A development of single-family 4,000-5,000 square foot homes on ½ acre lots consistent with the surrounding community would add 10-12 residences to the North Tustin community, alleviate or reduce many of the neighborhood concerns, and be consistent with the surrounding community. I do not believe the objects as crafted allowed for the examination of all options, some of which might be better suited for this development's congruence with the surrounding community.

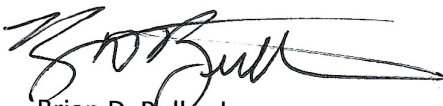
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3. **Water** – We are truly baffled at the conclusion that the project would have no significant impact to water usage. While we recognize the Tennis Club does use a certain volume of water today, it is quite difficult to imagine that volume usage is as significant as a development with 37 residences. Daily we are provided public service reminders to conserve water and our water provider, City of Tustin, requires local residents to restrict watering to 3 days for limited time because there is not enough water. How can a project of this size not be a drain of water resources that requires more in-depth evaluation. Without a proper, objective study that evaluates a significant period of time versus the single day approach, it is difficult for us to accept the water conclusion as being accurate.
4. **Recreation / Open Space** – The Tennis Club is one of the few recreational and open space land in the community. It appears the EIR did not consider the impact of the loss of this recreational open space on the community (contending it is private property). The facility is used not only by local residents and club members, approximately 10-20%, but more importantly it is a vital recreational facility for local schools, residents and non-members of surrounding communities. More than 80% of the Club's activities are enjoyed by those outside of the immediate neighborhood and the Club's membership. The County also fails to consider in this EIR that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
5. **Recorded Land Use Covenant** – All of us who have bought homes surrounding the Tennis Club have done so with the knowledge that it was zoned as recreational/open space and had a land use covenant preventing the alteration of that zoning designation. We made our decisions to buy our homes and the price we were willing to pay for the homes based on that understanding. To unilaterally change that zoning requirement by

relying on marginal arguments that this land should be developed to achieve State political goals of affordable housing is wrong. Further, nothing about this development as proposed is focused on developing affordable housing. Instead it is designed to enrich the developer and his investors at the expense of local homeowners. Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.

6. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.
7. **Wildlife** – The considerations for the impact to wildlife are inadequate and do not properly assess how the disruption of existing wildlife will impact the surrounding neighborhood. For example, displacing the snake population from its existing homes will undoubtedly increase the potential for poisonous snake bites within the property lines of existing homeowners exposing young children and pets to unnecessary danger. The Red Hawk population is extremely territorial and aggressive when nesting. Removing the natural nesting spots existing on the Tennis Club today will force them to inhabit trees closer to existing population and increase the frequency of Red Hawk attacks and reduce existing homeowners ability to the use of their outdoor property.

There are a number of other assumptions in the EIR that are inaccurate or insufficient to support the overall conclusions reached in this document. We respectfully request that this project be denied approval, the existing recreational and open space zoning be honored and the County refrain from enriching a few to the detriment of the surrounding community. We appreciate the time spent considering our comment letter and hope the planning commission will strongly consider the objections of the local community.

Sincerely,



Brian D. Bullard
2232 Racquet Hill
Santa Ana, CA 92705



Carrie G. Bullard

Cc: Hon. Katie Porter
U.S. House of Representatives

Supervisor Don Wagner
Orange County Board of Supervisors

Mayor Austin Lumbard
City of Tustin

Canning, Kevin

From: Bruce Junor <bjunor@cox.net>
Sent: Wednesday, June 29, 2022 3:52 PM
To: Canning, Kevin
Cc: Kirk Watilo; susandobak@att.net
Subject: Property review

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Kevin Canning

As residents of Tustin since 1960 (62 years) and North Tustin since 1998 (24 years), we are well aware of the congestion problem of this property. We are writing to protest any Rezoning of this residential and seriously land-locked, 0.24 acre piece of property

The property is located at the east end of Browning with only one method of entry and exit. Essentially, this is at the Tustin Hills Tennis Club with only one method of access. We suggest that the responsible approval committee members should all take a drive from Browning & Irvine and note the complexity of reaching this site

The surrounding property (adjacent to the tennis club) was developed in the early 1950's

Any emergency access will be near impossible to improve.

For this, and the other reasons presented in the community protests, We request you reject the concept of rezoning this site

Sincerely

Bruce B. Junor

Dennis M. Junor

Alan K. Junor

1342 Apsley Road , North Tustin , CA, 92705

714-544-5958



Virus-free. www.avast.com

June 29, 2022

Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
P.O. Box 4048
Santa Ana, California 92702-4048

Re: Ranch Hill Partners EIR

Dear Mr. Canning,

Thank you for the opportunity to comment on Ranch Hills Planned Development (PA180034 / VTTM 18119) EIR. We recognize developments of this nature are always difficult and challenging to assess what is in the public's best interest. Unfortunately, the conclusions reached in this EIR are one-sided, advantageous to the developer and clearly not in the interest of the surrounding community. Stepping back from all of the technical objections, at a simple level, how can the County justify building 37 townhomes/condos on a piece of property surrounded almost entirely by a community with single-family, mostly single story homes on a half of an acre of land. There are no arguments that can be made that would support this development as not being anything other than extraordinarily out of character for the community and all of the arguments put forth in the EIR simply ignore the fact that the Tennis Club is an important part of the community valued by the local residents and those outside the immediate area. The negative impact to the greater community by removing such a significant recreational facility is tremendous and cannot be undone should this development move forward.

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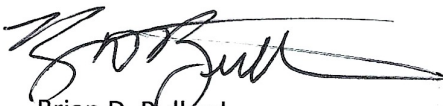
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6. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.
7. **Wildlife** – The considerations for the impact to wildlife are inadequate and do not properly assess how the disruption of existing wildlife will impact the surrounding neighborhood. For example, displacing the snake population from its existing homes will undoubtedly increase the potential for poisonous snake bites within the property lines of existing homeowners exposing young children and pets to unnecessary danger. The Red Hawk population is extremely territorial and aggressive when nesting. Removing the natural nesting spots existing on the Tennis Club today will force them to inhabit trees closer to existing population and increase the frequency of Red Hawk attacks and reduce existing homeowners ability to the use of their outdoor property.

There are a number of other assumptions in the EIR that are inaccurate or insufficient to support the overall conclusions reached in this document. We respectfully request that this project be denied approval, the existing recreational and open space zoning be honored and the County refrain from enriching a few to the detriment of the surrounding community. We appreciate the time spent considering our comment letter and hope the planning commission will strongly consider the objections of the local community.

Sincerely,



Brian D. Bullard
2232 Racquet Hill
Santa Ana, CA 92705



Carrie G. Bullard

Cc: Hon. Katie Porter
U.S. House of Representatives

Supervisor Don Wagner
Orange County Board of Supervisors

Mayor Austin Lumbard
City of Tustin

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¼ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
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zoning. That promise should be honored without the need for court intervention.

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Additional Comments

We purchased our house on 11741 Highview Drive in North Tustin in 1992 and have lived there since. The tennis club and most importantly the view were all crucial to our making the purchase. There is no question that the proposed project would be greatly negative to the value of our house/property and our enjoyment thereof.

Sincerely,
Charles Silberberg
Anna C. Silberberg

Canning, Kevin

From: Christer Fiege-Kollmann <ckollmann@earthlink.net>
Sent: Wednesday, June 29, 2022 2:54 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com; lkollmann@earthlink.net
Subject: Proposed Ranch Hills Planned Development - Planning Application No. PA180034, Vesting Tentative Tract Map No. TT18119

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

June 29, 2022

Mr. Kevin Canning
County of Orange, OC Public Works
Development Services/Planning
601 North Ross Street
Santa Ana, CA 92701-4048

Dear Mr. Canning:

The purpose of this email is to inform the Orange County Public Works Development Services Department my objection and opposition to the 37-unit condominium development proposed for the Tustin Hills Racquet Club.

I grew up in North Tustin, attended Tustin Memorial Elementary School, C.E. Utt Middle School, and Foothill High School. My mother played tennis at the Tustin Hills Racquet Club in the 1960's. I have attended several events at the Racquet Club including weddings. My wife and I live within one (1) mile of the Racquet Club, near the intersection of Browning Avenue and La Colina Drive. On a daily basis, we walk in the Tustin Hills neighborhood, walking nearby and/or through the Racquet Club, utilizing the 10-foot wide pedestrian accessway connecting with the residential neighborhood, north of the Racquet Club, located and accessed from Racquet Hill.

I have reviewed the 2022 Draft Environmental Impact Report ("DEIR") and Report Appendices A-N, dated May 2022, for the proposed Ranch Hills Community. The following points should be given consideration as reasons why higher density housing is not appropriate in this neighborhood.

General Plan/Land Use

Exhibit 1-3 of the DEIR depicts the Land Use designation of 1B Suburban Residential Community (0.50 to 18 du/ac) for Racquet Club property. This is the same designation for all the existing homes in the North Tustin community bordering the Racquet Club. The neighboring North Tustin homes have been developed at a density of two (2) units per acre. The proposed 37-unit development reflects a density of 6.29 du's/ac based on the gross land area of 266,218 sq. ft. (5.88 acres) and 8.52 du's/acre based on the reported net land area 188,918 sq. ft. (4.34 acres). Deducting the common area space (Lot 6 at 16,075 sq. ft. and Lot 7 at 5,340 sq. ft.), the true net area is 167,503 sq. ft. (3.85 acres), which relates to a density of 9.62 du's/acre. These proposed densities are a significant increase and not supported by the neighboring residential estate lot uses.

If the property were redeveloped for residential use, the density should not exceed 2.00 du's/acre based on net area (which would exclude required street right-of-way). As a result, the maximum number of homes would be around 10 to 11 singled-family detached residences.

Zoning

Exhibit 1-4 of the DEIR depicts a zoning designation of A1 (General Agriculture) for the Racquet Club property. The property owner is requesting a zoning change from A1 to R2 (5000). Although this designation is consistent with the General Plan designation of 1B (Suburban Residential), R2 (5000) reflects a high density multi-family use that is incompatible and inconsistent with the existing North Tustin residential neighborhood. The zoning adjacent to the Racquet Hill property is E4-20000, which relates to a minimum lot size of 20,000 square feet, and also consistent with the General Plan. Like the General Plan, the E4-20000 zoning is geared toward larger estate lots.

The Vesting Tentative Tract Map (Figure 3-4 of the DEIR) excludes important land area information that was previously provided in the CEQA Initial Study Proposed Mitigated Negative Declaration ("MND"), dated May 2020. In the MND, the reported net land area of 188,915 square feet divided by 37 du's, results in an average lot size of 5,106 sq. ft. Two (2) common area lots, identified as Lot 6 at and Lot 7, should be excluded from the calculation. Deducting the common area space (Lot 6 at 16,075 sq. ft. and Lot 7 at 5,340 sq. ft.), the true net area is 167,503 sq. ft., which results in an average lot size of 4,527 sq. ft. ($167,503 \text{ sq. ft.} / 37 \text{ du's} = 4,527 \text{ sq. ft.}$). As a result, the minimum lot size is actually lower than what the proposed R2 (5000) would allow. This form of small-lot development is incompatible with the existing residential neighborhoods and unprecedented within the North Tustin/Cowan Heights/Lemon Heights communities.

Traffic

The traffic analysis is flawed. The 37-unit development will generate a different type and flow of traffic compared to the existing racquet club use. With the proposed 37-unit development, the neighboring streets, including, Browning, SE Skyline, Ranchwood, Red Hill, and La Colina will experience increased commuter and school traffic in the mornings and evenings and various times throughout the day. In addition, the traffic study does not analyze SE Skyline's intersection with Red Hill Avenue.

Traffic will increase as a result of the proposed 37-unit development not decrease. Furthermore, given the number of walkers, bikers, children playing, increased traffic will create safety issues on the already busy streets, many of which do not have sidewalks.

All vehicle traffic generated by the existing residential community and Racquet Club property must travel through a "pinch point" on Simon Ranch Road near the intersection of Beverly Glen Drive and Browning Avenue. Based on a review of aerial photographs included in the DEIR, there are approximately 104 homes located on the neighborhood streets, which include: Outlook Lane, Valhalla drive, Highview Drive, Lerner Lane, Salt Air Drive, Liane Lane, Pavilion Drive and Simon Ranch Road. The developer of the Racquet Club property now proposes 37 homes, representing an increase of nearly 36% from the 104 homes that currently exist and must travel through the "pinch point". Without a second emergency ingress/exit point, the pinch point is problematic and a safety issue during emergencies and/or evacuations.

Pedestrian Walkway

The proposed development will eliminate the ability to use the 10-foot wide pedestrian accessway connecting with the residential neighborhood, north of the Racquet Club, located and accessed from Racquet Hill. This is a commonly used pedestrian corridor by residents in the local area. Any redevelopment of the Racquet Club property should preserve this desirable amenity serving the community and providing connectivity to various neighborhoods.

Conclusion

As a resident in this North Tustin community for nearly 60 years, I am strongly opposed to higher density housing in the neighborhood. The proposed density for the Racquet Club property is over three (3) times what exists in the area (over 6 units per acre for the proposed development compared to 2 units per acre for adjacent properties). The increase in traffic,

particularly during in the mornings when school and commuter traffic is at its peak, coupled with the loss of the pedestrian walkway, would be a detriment to the community and quality of life.

Respectfully,

Christer Fiege-Kollmann

Christer Fiege-Kollmann
1941 La Colina Drive
North Tustin, CA 92705
(714) 925-2898

Dear Mr. Canning:

I am against the proposed high-density development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for several reasons:

1. **Traffic.** The project will create more traffic. The streets in our neighborhood are very narrow with no sidewalks and minimal streetlights. I live next to the Tustin Hills Racquet Club and drive my car several times per day up and down Browning/Simon Ranch/Pavillion. Many residents park their cars in the street and many people walk and ride bikes. While driving, I really need to focus on the cars parked in the street and the people that are walking/biking between and around the parked cars. Adding more traffic from 100 new resident drivers creates a safety hazard that the Draft EIR does not address.
2. **Fire Safety** – When I was young, our neighborhood was evacuated during some fires, which was very scary. I remember many neighbors frantically packing up and their vehicles; there were lots of fast traveling cars on the streets coming down from the hill, which was dangerous. Also, there is only one entrance/exit road to the proposed development, and if anything ever blocked that single road, many residents in the proposed development would be trapped and would not be able to evacuate except by foot, which may not be an option for older people.
3. **Recreation / Open Space** – The Draft EIR does not consider the loss of this recreational open space on the community. There are always families at the pool and kids playing in the green belt next to the pool. There are still lots of people playing tennis and many more people are playing on the new pickleball courts. There are also lots of school/charity fund raisers and weddings and various receptions that happen throughout the year. The County fails to consider that this site is the last remaining parcel in the North Tustin area zoned for Recreation/Open Space.

I respectfully request that this proposed development be denied.

Sincerely,

Colin Holt



Canning, Kevin

From: Dan <daniel.l.erickson@gmail.com>
Sent: Wednesday, June 29, 2022 5:06 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Proposed Redevelopment of Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Kevin,

I am writing you in opposition for the Proposed Redevelopment of Tustin Hills Racquet Club. I live down the hill from the Racquet Club on Ranchwood Road and have a major concern regarding a deterioration in public safety caused by the development of this property as proposed. Browning Avenue has a posted 25 mph speed limit being a residential street. It already experiences heavy traffic especially during rush hour times. My neighborhood is already negatively impacted by the residence using Ranchwood Road and Eveningside Drive as a shortcut from Browning to La Colina Drive. Presumably, apps like Waze and Google Maps direct these commuters to take these routes as a faster way to their destination. This is already a public safety problem since there are a number of children and grandchildren living or visiting this area. In addition, these commuters frequently exceed the 25 mph speed limit. Adding a significant amount of traffic to this neighborhood would only exasperate this situation. My concern is that someone will eventually either be seriously injured or killed.

Respectively submitted,

Dan Erickson

Sent from [Mail](#) for Windows

Canning, Kevin

From: A G <adecg544@gmail.com>
Sent: Wednesday, June 29, 2022 12:21 PM
To: Canning, Kevin
Subject: PA180034/VTTM18119

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning – Please don't ruin our beautiful neighborhood. I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- 1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
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- 4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.*

5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

David Grant

1821 Lerner Lane

Santa Ana, Ca 92705

Canning, Kevin

From: Deb K <debiekav@gmail.com>
Sent: Wednesday, June 29, 2022 7:22 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Save the Racquet Club!

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

“We can also understand how our economic institutions are increasingly rooted in *collective greed* and notice its basis, in society as well as in ourselves, and in self-centeredness, a relative lack of sense of connection to others, and an inattention to long-term consequences.” ~Donald Rothberg “The Engaged Spiritual Life”

As a native of Orange County, I have watched various areas of our county grow over the past 60+ years. Growing up in the City of Orange, I was unaware of this “hidden jewel” of North Tustin until two years ago when my husband and I were looking for a home after our grown sons left to pursue their adulthood.

Having lived off Browning and Redberry for the past two years, walking our golden retriever daily throughout the neighborhood, we have come to know the wonderful community, especially the people who live here. With the intention to build the high density development on the Racquet Club property, concerns are not only how it will impact each family/home in the surrounding area, but a greater concern for safety.

Traffic on Browning is already busy, especially during the school year. We have witnessed cars and work trucks regularly speed and run stop signs. We have many new young families moving into the neighborhood and with Browning being the main thoroughfare for the Racquet Club property, there will certainly be a greater incidence of this behavior.

Of course there are other concerns as have been shared, so I will not repeat them here.

We hope that the project is reconsidered for our neighborhood community, and not just for the benefit of the Beauchamps and who ever else is profiting from this development.

Debra & Mike Kavanaugh
2062 Redberry Road
North Tustin, CA 92705

Canning, Kevin

From: Derrin Roe <derrinroe@cox.net>
Sent: Wednesday, June 29, 2022 3:41 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development (PA180034 / VTTM 18119)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Mr. Canning,

Here we are two years later and the only thing that has changed is that the drought has worsened and the hills are even drier, setting the stage for an even worse fire scenario. All of the points to my opposition below are still valid and I am still very much against this project. I reviewed the new EIR and living here in this neighborhood, I do not believe it to be accurate.

Thanks again for your time and have a great Independence Day.

Derrin Roe
2111 Salt Air Dr
Santa Ana, CA 92705

On June 5, 2020 at 2:04 PM "Canning, Kevin" <Kevin.Canning@ocpw.ocgov.com> wrote:

Received, thank you

Kevin Canning | Contract Planner | OC Development Services / Planning

601 North Ross Street | Santa Ana, California 92701-4048

714.667.8847 | kevin.canning@ocpw.ocgov.com

Visit us online for permitting applications/project status at <https://myoceservices.ocgov.com/> or general questions and assistance call 714 667-8888

NOTICE: THE COUNTY SERVICE CENTER ON THE FIRST FLOOR WILL BE TEMPORARILY CLOSED TO THE PUBLIC UNTIL FURTHER NOTICE. Online services remain accessible 24/7.

ADDITIONALLY, DEVELOPMENT SERVICES/PLANNING STAFF WILL BE WORKING ON A ROTATING SCHEDULE IN OFFICES AND ALSO REMOTELY. RESPONSE TIMES MAY BE AFFECTED. YOUR PATIENCE IS APPRECIATED.

From: Derrin Roe <derrinroe@cox.net>
Sent: Friday, June 5, 2020 2:21 PM
To: Canning, Kevin <Kevin.Canning@ocpw.ocgov.com>
Cc: kirkwatilo@gmail.com
Subject: PA180034 / VTTM 18119 - Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

My name is Derrin Roe, I'm the homeowner at 2111 Salt Air Dr, Santa Ana, CA 92705. I've been a resident here for almost five years with my wife and two sons. I'm writing to express my opposition to the Ranch Hills Planned Development proposed to replace the Tustin Hills Racquet Club.

While I strongly believe in an individual's property rights, this project absolutely does not fit in this community. Not only will the increase in density lower the quality of life for surrounding residents such as myself, it will also create unsafe conditions. The only ingress/egress to the new development would be via Simon Ranch Road/Browning Street. Simon Ranch Road is already a very narrow double loaded street with no public sidewalks and homes built very close to the street due to the steep grades in the area. As Simon Ranch transitions into Browning Ave, there are at least sidewalks but this is also a very narrow street with parking on both sides. These streets simply cannot handle the additional traffic from such a high density development. Browning is already heavily impacted from commuter traffic being routed by Waze most evenings in an attempt to bypass the 5/55 interchange.

In addition to negatively impacting the quality of life, the increased traffic will also create other safety hazards. Our neighborhood has a built-in "exercise loop" on the public streets Simon Ranch Rd, Pavillion Dr and Simon Ranch Road; they form a loop around the hill with the proposed project sitting at the top. Most of the residents up here walk the loop daily and my kids ride their bikes around the loop all the time. Even with no public sidewalks and narrow streets it is relatively safe to share the streets with the traffic. The exception is the very steep section on Simon Ranch, the same section that would be the most impacted by the development. Another safety issue would be in the event of an evacuation, which I've already experienced once up here when Peters Canyon was on fire and we had to leave. The narrow streets are not conducive to a larger number of residents trying to get down the only street there is, especially with large fire fighting equipment trying to get up the same street!

I know you're probably reading a lot of these emails so let me conclude quickly. Unlike most of my neighbors I don't believe saving a racquet club no one apparently wants to own is feasible. I do believe a residential project in that space is the second best solution, but this area just doesn't have the infrastructure to support a high density development. Anything built must be consistent with the zoning already in place for single family residential homes on larger than average lots.

Thank you for taking the time to read my concerns.

Derrin Roe

2111 Salt Air Dr

Santa Ana, CA 92705

714-272-6022

6/29/2022

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¼ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,



Eddie Martinez

2052 Valhalla Drive

Santa Ana, CA 92705

Canning, Kevin

From: Elena Chung <elenachung@cox.net>
Sent: Wednesday, June 29, 2022 5:00 PM
To: Canning, Kevin
Subject: Respectfully Oppose: Ranch Hills Planned Development in 92705 (Redhill Ridge Community)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I had written once before & write again today to strongly oppose the “Affordable Housing” development of condominiums (PA180034/VTTM 18119).

This development poses a great concern for safety in our Redhill Ridge neighborhood as the proposed 37 condominiums will result in increased traffic adding more than 200 vehicles on the streets which will not only impact daily flow of traffic but most critically during emergencies (like wildfires) where sudden evacuations are necessary.

This fire safety risk alone is reason enough to halt such a development on the existing small plot of land (the historical community tennis club); a restrictive one-way in and over-way out via Simon Ranch Road threatens our families’ safety & well-being. It is not just an irrational fear but a very realistic & dangerous scenario which may result in great tragedy.

There are numerous reasons that myself & my neighbors are concerned over the proposed building of the high-density condos, but I ask that you seriously consider the safety risks of our neighborhood with respect to potential fire/earthquake hazards and the ingress/egress of our street layout.

Please consider the lives of our community more important than the proposed business profits or offering of improved “affordable housing” of 37 new homes in a neighborhood where the ‘average’ home sells for ~ \$1,300,000. Thank you for your time and consideration on such an important matter as this.

Sincerely,
Elena Chung
Simon Ranch Rd. Resident

Sent from my iPhone



ATTORNEYS AT LAW

Michael J. FitzGerald*
Eoin L. Kreditor*
Lynne Bolduc
Robert C. Risbrough
George Vausher, LL.M., CPA‡
David M. Lawrence
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Sherilyn Learned O'Dell
Charles C. McKenna
David R. Hunt
Natalie F. Foti
Brook John Changala
Josephine Rachelle Aranda
Pfrancez C. Quijano
William Allen Miller
Bill Sembel
Sam Sayed
John M. Marston†
Deborah M. Rosenthal†
Maria M. Rullo†

June 29, 2022

VIA U.S. MAIL AND E-MAIL

Author's Email: drosenthal@fkbrlegal.com
FKBR ref # 2021346.01

Mr. Kevin Canning
Contract Planner
OC Public Works
Development Services/Planning
County of Orange
601 North Ross Street, P.O. Box 4048
Santa Ana, CA 92701-4048
E: kevin.canning@ocpw.ocgov.com

Re: ***Tustin Racquet Club –11782 Simon Ranch Rd, Santa Ana, CA***
Comments on 2022 Draft Environmental Impact Report for the Ranch Hills
Planned Development (PA 180034/VTTM18119)
County EIR No. 635/SCH No. 2021060400

Dear Mr. Canning:

This letter is submitted on behalf of our client, the Foothill Communities Association (“FCA”), a non-profit organization of concerned citizens living within the geographic area directly affected by the proposed Ranch Hills Planned Development (“Project”). The FCA has a long and successful history of advocating for strict application of the County’s General Plan and Zoning Ordinance within the unincorporated areas of North Tustin. The FCA does not believe the proposed Project is consistent with the County General Plan, the North Tustin Specific Plan (“SP”), the County Zoning and Subdivision Codes, State housing law, or the expectations of the community.

The Project proposes a dramatic and permanent change in development pattern of North Tustin. It will replace a highly-valued and economically profitable tennis club that serves hundreds of local residents with a 37-unit multi-family subdivision more than three times the density of adjacent development. The proposed Project will not only eliminate the last recreationally zoned facility in the area, but will add a high-density non-compliant residential development in an area subject to extreme fire risk. The Project threatens both the quality of life in North Tustin and, potentially, the lives of existing residents who will see traffic on essential evacuation routes increased by a very significant percentage.

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The Draft Environmental Impact Report (“DEIR”) for the Project assumes it is subject to the strictures of the Housing Accountability Act at Government Code Section 65589.5 (“SB 330”). This is incorrect. The Project is inconsistent with both the County’s “objective general plan standards and criteria” for residential development of the site and the applicable residential zoning. The applicant is well aware that the proposed high-density upscale housing Project would never be approved under applicable zoning or the California Environmental Quality Act (“CEQA”) but is attempting to use SB 330 as a hammer to intimidate the County into abandoning its long-established development principles.

SB 330 is a new statute with virtually no record of implementation anywhere in the state. In the absence of governmental experience or judicial guidance, it appears that County consultants and staff simply accepted the applicant’s self-serving argument that the Project’s residential zoning was inconsistent with its residential General Plan designation, and thus there was no discretion to modify or deny the application in any way. As a result, the DEIR wrongly fails to evaluate the Project’s consistency with objective general plan standards, ignores the symbiotic relationship between planning and zoning, skips essential environmental review, and does not give even a limited picture of the Project’s actual environmental impacts. Despite adoption of SB 330, the County is required to evaluate all potential impacts under CEQA, and cannot simply eliminate mandatory analysis on the theory that any development proposing less than maximum general plan density standards must willy-nilly be approved.

Following is a summary analysis of the Project’s inconsistency with the County’s General Plan, Zoning and Subdivision Codes, and Variance/Special Permit Requirements. In addition, this letter identifies significant deficiencies in the environmental analysis presented in the DEIR. In some cases, the DEIR is deficient because the County improperly assumes specific environmental analysis is not required under SB 330. In other cases, the DEIR simply fails to consider obvious environmental impacts on the theory that the County does not have legal authority to reject the proposed density. In fact, the County is required to document its conclusion that the Project is consistent with all applicable general plan standards, the zoning is inconsistent with the general plan, and it will mitigate environmental impacts to the extent feasible. The DEIR therefore fails to comply with CEQA and other applicable planning and zoning laws.

A. FACTUAL BACKGROUND

The Project proposes to replace the existing Tustin Hills Racquet Club (“Club”) that has profitably served the area for more than 60 years. The Club provides the only active recreational uses within North Tustin and is the only property in the area intentionally zoned for open space uses. The Project consists of 34 two-family duplexes in 17 buildings and 3 single-family detached homes, for a total of 37 units on 5.88 acres or 6.3 units per acre. The has no secondary access, and is surrounded on three sides by development at an approximate density of 2.0 units per acre, or less than one-third the density of the proposed Project.

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The Project is designated as “Suburban Residential (1B) Communities” (“Suburban Residential”) in the County’s General Plan, allowing 0.5 to 18 dwelling units per acre, depending on zoning. Suburban Residential is a catch-all designation consistent with multiple single- and multi-family zoning categories, ranging from estate development to multi-family apartments. The site is zoned as A1 “General Agriculture,” which is the appropriate zoning for the Club’s long-term and profitable recreational use. A1 zoning allows the County to decide when, and if, recreational use is no longer feasible and to assign an appropriate residential category with the Suburban Residential designation in response to a specific development application. [OC Zoning Code Sec. 7-9-30.1 (a) “this district may be used as an interim zone in those areas which the General Plan may designate for more intensive urban uses in the future”.) The Project is admittedly inconsistent with A1 zoning and, absent SB 330, would never have been considered for approval without rezoning.

The Club property is subject to two recorded covenants that limit its use to recreation or low-density residential. The DEIR points out that both covenants were voluntarily offered by the owner in return for community acceptance of Club expansion. At the same time, the DEIR disregards the significance of the recorded restrictive covenants by arguing they were not included a conditions of prior Club expansions. In fact, as recorded restrictions, the covenants are more enforceable than a condition of approval because they cannot be altered without the consent of beneficiaries, all or the majority of whom oppose the Project. By ignoring the recorded legal restrictions on residential reuse of the property, the DEIR puts the County in the anomalous position of potentially approving a highly controversial Project that can never be built because the current owner does not have the legal right to do so.

The Project will not meet any affordability criteria. It is described in the DEIR as suitable for existing North Tustin homeowners who wish to downsize from larger homes. The two-story configuration of the proposed homes is less than suitable for older residents, and appears to be solely for the purpose of increasing potential density by reducing building footprints. The Project offers no services or amenities that would increase affordability and is not located near any transit nodes or bus routes. Access to the site is limited to automobiles, and the nearest neighborhood-serving commercial is at least two miles away. Finally, residential development of the site is not required for the County to meet its Regional Housing Needs Assessment (“RHNA”) allocation under the County’s last or most recent housing elements; the County has no shortfall of “above moderate” housing.

B. THE PROJECT DOES NOT QUALIFY FOR SUMMARY APPROVAL UNDER SB 330

Compliance with SB 330 is the only way the Project can proceed without rezoning from A1 General Agriculture to a higher density residential category. To qualify for SB 330 review, the Project must be consistent with all objective non-discretionary standards in the County’s General Plan, Zoning Code, and Subdivision Ordinance. There is a special exception if the Project meets objective General Plan requirements, but the Zoning is inconsistent with the General Plan. In this case, the General Plan designates the property for a wide range of residential densities. The

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A1 zone allows agriculture, recreation, open space, and residential development. On their face, therefore, the A1 zoning is not inconsistent with the General Plan; it is simply a lesser included density and range of uses.

Even if A1 zoning were inconsistent with the Suburban Residential designation, the DEIR fails to evaluate whether the Project is consistent with all objective General Plan policies and standards. If it violates even one objective General Plan requirement, the Project is not eligible for SB 330 streamlining and must demonstrate consistency with both the Zoning and Subdivision Codes. The DEIR admits the Project fails this test.

The FCA believes the Project is not subject to SB 330 for multiple reasons. Following is a summary discussion of the reasons that SB 330 does not apply to the Project. In that this letter is primarily directed at deficiencies in the DEIR, additional explanation of these issues will be submitted prior to hearings on the Project.

a. The Project Is Not Consistent with the County's General Plan

The Project proposes less than the maximum number of units allowed under the County's broad Suburban Residential designation in the General Plan. However, the Project does not comply with numerous other objective General Plan standards and policies. County consultants and staff did not evaluate compliance of the Project with all objective General Plan policies; they simply assumed that density was the only standard for General Plan consistency without looking further at consistency of uses. In fact, the Project violates a variety of other General Plan policies including Those regulating levels of traffic service, wildfire protection, hazards, and most importantly community consistency. Orange County has always required compatibility between new developments and surrounding uses, as well as buffer zones to separate incompatible design or uses. The Project violates the County's well-established policy that new developments should blends seamlessly with existing uses, for the benefit of all. As a result, SB 330 does not apply.

b. The Project Is Not Consistent with Applicable Zoning

The Project is not a permitted use under the current A1 General Agriculture Zone, as acknowledged in the DEIR [DEIR p. 1-1.]. It allows the current private recreational uses offered by the Club and intentionally operates as an interim zone until submittal of a specific re-development application. Under normal planning rules, the Project cannot be approved without rezoning the property to a residential category consistent with the surrounding neighborhood.

The General Plan's Suburban Residential designation allows a very wide range of housing types, from estates on large lots to attached dwelling units (townhomes, condominiums, and clustered arrangements). It is implemented through multiple zoning categories which correlate to different ranges of housing types and density, depending on community compatibility. The A1 Agriculture Zoning category is consistent with the Suburban Residential designation in that it allowed continuation of a long-standing community-serving use plus limited residential development. Further, the A1 zone was deliberately adopted as an interim zone to provide

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continues recreational opportunities for the area and to require rezoning at densities consistent with surrounding County development in accordance with the Suburban Residential designation. [OC Zoning Code Sec. OC Zoning Code Sec. 7-9-30.1 (a).]

The DEIR acknowledges the Project cannot be approved under the A1 Agriculture Zone but accepts the applicant's assertion that A1 zoning is not consistent with Suburban Recreation because it allows fewer residences than the maximum permitted under the General Plan. This is not the meaning of "consistency" between General Plan and Zoning under SB 330. The A1 Zone is one of multiple residential zones arguably allowed under the Suburban Residential designation in accordance with the legal and historical relationship between zoning categories and general plan designations. County consultants and staff erred when they concluded, without analysis or explanation, that the only measure of consistency is the maximum density allowed under the General Plan. There is no inconsistency between low or medium density residential Zoning and a General Plan category that potentially allows more density. Any other interpretation of SB 330 would effectively eliminate all lower-density zoning categories within the Suburban Residential category, regardless of purpose. For instance, most residential zones in the County do not allow up to 18 units per acre; only some multi-family zones allow urban densities at this level. Of course, multi-family zones are not compatible with surrounding development in North Tustin in accordance with single-family half-acre zoning (2 units/acre).

There is no evidence the Legislature intended to disrupt the fundamental relationship between inclusive General Plan residential categories and implementation through more fine-grained Zoning classifications. Examples of actionable inconsistencies cited by the California Department of Housing and Urban Development ("HCD") all situations where the adopted zoning is for an entirely different and consistent with General Plan use categories, such as industrial zoning with residential designation. Broad General Plan categories were never intended to replace Zoning classifications that cap allowable density at different levels for the same uses on specific sites. A1 Agriculture that allows 1 unit per parcel is not inconsistent with Suburban Residential that allows .5 to 18 units per acre; it is simply a subset of allowable residential use. In this case, the A1 General Agriculture Zone was deliberately adopted in recognition of both the existing recreational use and the possibility that additional development would eventually be requested at a lesser-included density. At least, the A1 Zone recognized that the Club was a virtually unique opportunity for active recreation in a highly impacted area with few, if any, neighborhood parks. As a result, SB 330 does not apply.

c. The Project Is Not Consistent with the County Subdivision Ordinance

The Project does not comply with the County's Subdivision Ordinance in that it requires at least two discretionary variances or use permits as designed. SB 330 allows residential projects to proceed in compliance with the General Plan, in the event of inconsistent zoning, but it contains no parallel exemption from strict compliance with the County's Subdivision Ordinance. Without a vesting tentative tract map and use permits for Planned Development and an oversized retaining wall, the Project cannot be approved.

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The Project appears to violate minimum width standards for private access roads, requirements for alternative access in or near high fire areas, on-street parking limits, and minimum driveway widths, among others. FCA believes the Project cannot qualify for either of the two special use permits or variances required for construction. The County adopted the minimum development standards in its Subdivision Code for the purpose of protecting current and future residents; the Project neither meets a housing need nor increases the safety and security of the North Tustin community. As a result of the Project's failure to comply with the Subdivision Ordinance, SB 330 does not apply.

d. The Project Is Not Exempt From CEQA Review

SB 330 specifically requires compliance with CEQA before approval: “[n]either shall anything in this section be construed to relieve the local agency from making one or more of the findings required pursuant to Section 21081 of the Public Resources Code or otherwise complying with the California Environmental Quality Act...” [Government Code Sec. 65589.5(e).] The DEIR truncates its environmental analysis by eliminating any impacts relating to density, use, or location on the incorrect theory that the County is prohibited from denying the Project under SB 330 and therefore the County has virtually no discretion to reject an environmentally damaging project or to require mitigation.

CEQA requires the DEIR to “discuss any inconsistencies between the proposed project and applicable general plans...” [CEQA Guidelines Sec. 15125.] The DEIR for the Ranch Hills Planned Development does not discuss either consistencies or inconsistencies between the Project and the County's General Plan, Zoning Code, and Subdivision Ordinance. [See Orange County Local Procedures Manual (2020), p. 11: “Local Regulations to be considered may include the General Plan, Zoning Code and Codified Ordinance.”] As a result, the DEIR never explains how the Project is consistent with the County's General Plan, Zoning Ordinance, and Subdivision Code – or why SB 330 allows the County to ignore inconsistencies.

County consultants and staff compounded their original error by ignoring CEQA's clear mandate to evaluate inconsistencies between County regulations and the Project, regardless of SB 330. If the DEIR had analyzed inconsistencies with the County's General Plan, Zoning Code, and Subdivision Ordinance, it would have revealed numerous inconsistencies and environmental impacts that prevent approval. As a result, SB 330 does not apply.

e. The Project Is Not Needed to Meet RHNA Goals

SB 330 focuses on housing development projects that “contribute to meeting the need determined pursuant to this article without a thorough analysis of the economic, social, and environmental effects of the action...” [Government Code Sec.65589.5(b)] The DEIR offers a single self-serving statement that one of the Project Objectives is to meet housing needs: “OBJ-1: Provide homes that would meet the increased demand and shortage of housing in the North Tustin community, especially for people that want to downsize but stay in the same general area.” [DEIR, p. 1-3.]

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According to the County's adopted Housing Element, there is no shortage of "above moderate" housing capacity in the County. The last Housing Element shows opportunity for development of 5,163 "above moderate" units, more than double the RHNA allocation of 2,174 for the 2014-2021 period. [Housing Element, p. B-17.] The most recent iteration of the County's Housing Element also concludes that the higher 10,000+ RHNA need can be fully satisfied without the proposed Project. The DEIR offers no support for its assertion that there is a cognizable shortage of "above moderate" or "moderate" housing that will be satisfied by the Project, or that 2-story step-down housing is required in North Tustin.

Assertions of "need" in a Project Objective must be supported by substantial evidence. Although courts rarely overturn governmental judgments that a project's benefits outweigh significant adverse impacts, the County must provide evidence that the benefits will actually be provided and are neither illusory nor inadequate. In this case, there is no evidence whatsoever that the Project is needed at this location, or that other appropriately zoned sites cannot serve the same population. In this case, the DEIR offers no evidence that the Project is needed or that other appropriately zoned sites cannot meet all existing need for step-down housing.

f. The Project Violates Constitutional And Statutory Notice Requirements

As applied by the County, SB 330 effectively eliminates the Project's zoning designation without notice, hearing, or procedural protections of any kind. Neighboring property owners were given no notice or opportunity to object to the quick in-house Staff largely unexplained determination that the A1 Agriculture Zoning was inconsistent with the General Plan, due solely to density. The FCA, for instance, closely follows area development to ensure neighborhood compatibility of all new projects. In this case, the community had no notice that applicable use restrictions were being administratively set aside by Staff, without any determination by County decision-makers that existing zoning was being eliminated without appeal rights.

California federal and state courts have long held that neighboring property owners are entitled to notice and an opportunity to be heard on zone changes and variances. [See e.g. *Trancas v. city of Malibu* (2006) 138 Cal.Ap.4th 172, 182.] Unless neighboring property owners and residents have an opportunity to be heard on use and density determinations, the County runs afoul of established constitutional and statutory protections. The fact that SB 330 was adopted by the State Legislature does not eliminate property owners' constitutional rights to notice and hearing of development or rule changes affecting their land. Although the police power originates with state government, it does not allow the Legislature to ignore constitutional requirements. There is no evidence the California Legislature intended to eliminate lower-density zoning categories within a single General Plan category or change allowable uses by fiat, without individualized consideration or notice.

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C. THE DEIR DOES NOT ADEQUATELY ADDRESS THE PROJECT'S ENVIRONMENTAL IMPACTS IN ACCORDANCE WITH CEQA

The DEIR improperly assumes the County has no discretion to deny virtually any aspect of the Project, simply because it falls within the maximum density allowed under the Suburban Residential (1B) Communities designation. As a result of this foundational error, the DEIR fails to evaluate the Project's potential environmental impacts in accordance with CEQA because it assumes Project approval is a foregone conclusion. The FCA strongly disagrees with the conclusion that SB 330 eliminates all County discretion to reject a residential project simply because it proposes less density than the theoretical maximum allowed under the General Plan, regardless of zoning. Even if this conclusion were accurate, which it is not, SB 330 requires a full evaluation of all impacts under CEQA plus all feasible mitigation for significant impacts.

The DEIR also fails to attach a copy of the Mitigated Negative Declaration ("MND") and applicable comments as exhibits. Generally, there is a presumption that changes in estimates of environmental impacts without explanation are suspicious and require justification. In this case, the MND concluded the Project had no significant environmental impacts; the DEIR reaches the same conclusion with little additional analysis. The DEIR should have included the MND as an exhibit and explained any changes in estimated Project impacts.

i. The DEIR Badly Miscalculates Traffic Impacts

The DEIR Transportation analysis is inaccurate or misleading at several levels. As a preliminary matter, the traffic estimates for the Project have changed since publication of the earlier Mitigated Negative Declaration without explanation. It appears the DEIR prepared changed the methodology for calculating traffic generation on highly-suspect grounds. The DEIR reports that existing traffic for the Club was exactly the same number of trips as proposed Project, and less than the MND estimates. Apparently, the DEIR changed its trip generation numbers from single-family residential to multi-family for 34 of the units, simply by reclassifying the same units as multi-family. The traffic estimates simply are not reliable.

Primary access to the Project is via two two-lane roads, Pavillion Drive and Simon Ranch Road, that are classified as local streets with posted speed limits of 25 miles per hour. Even cursory examination of the road network shown on DEIR Exhibit 1-1 shows both roads as twisting with limited sight lines. For unexplained reasons, the traffic study prepared for the Project analyzes 6 off-site intersections but does not consider the Project's direct traffic impacts on the existing two-lane access roads that already serve more than 110 existing residences. Despite the fact that the Project will add at least 30 percent more homes to the street network in the immediate vicinity of the Project, the DEIR blithely asserts that no impacts are expected, even at peak hours.

The DEIR claims that CEQA no longer requires level of service ("LOS") analysis, despite the requirement for LOS review set forth in the County's 2020 Updated Transportation Implementation Manual. The DEIR elects to underestimate likely traffic generation by using single-family traffic generation numbers for only 3 units and 20% lower multi-family traffic

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generation for 34 proposed duplexes, despite carefully describing the duplexes as “single-family” townhouses for the purposes of General Plan consistency. While the FCA does not agree that the proposed townhomes are properly classified as “single-family,” it is inconsistent for the DEIR to treat them differently depending on the purpose of the analysis. If the duplexes were considered as “single-family,” they would generate approximately 10 trips per day or 377 (not 349) daily trips from the Project.

The DEIR simply ignores the Project’s potential traffic impacts on the two-lane local streets that will carry the majority of resulting traffic. For instance, the DEIR does not report differences in peak hour trips between the existing tennis club and housing that is likely to generate the most traffic during morning and afternoon rush hours. DEIR Appendix K acknowledges the need for comparison of peak hour trips and LOS evaluation, but the discussion is cursory and not reflected in the DEIR itself. For instance, Appendix K admits the Project will add trips to intersections already operating at LOS D, but fails to consider it as a potentially significant impact to local streets. Hiding potential impacts in an appendix is contrary to the full disclosure goals of CEQA.

According to the DEIR, the Project does not meet screening levels for assessment of vehicle miles traveled (“VMT”) under recent amendments to CEQA. The purpose of these amendments was to encourage new residential developments as close as possible to office, industrial, and commercial uses to reduce necessary automobile trips, and to penalize new developments located in isolated residential enclaves with no access to mass transit or walkable shopping. Located deep in the heart of a single-family residential neighborhood that is completely dependent on personal automobiles, the Project is the antithesis of the type of residential development encouraged by CEQA.

In sum, the Transportation section of the DEIR and Appendix K must be substantially revised and recirculated to address the capacity of Pavillion Drive and Simon Ranch Road to accommodate Project traffic during peak hours and to acknowledge that the Project’s VMT is likely to be much greater than the existing Club, as residents drive to daily employment and shopping, instead of utilizing a local Club. The DEIR must clarify whether the 34 proposed duplexes are single-family for the purposes of transportation analysis, or multi-family for the purpose of consistency with the site’s General Plan designation. In either case, of course, the Project is not compatible with surrounding uses and densities. The DEIR should acknowledge the Project is not consistent with VMT reduction goals and will also violate mandatory General Plan LOS requirements. In addition, using the correct traffic generation numbers would demonstrate the Project cannot meet the DEIR Objective of reducing traffic impacts. There is no legitimate basis for concluding the Project will reduce traffic impacts.

ii. The DEIR Ignores Obvious Fire and Evacuation Hazards

The Project is relatively high-density multi-family development proposed with a single point of ingress/egress from a twisty two-lane local street that is already used by more than 110 single-family homes. There is no secondary access from the development and, in fact, the entire

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neighborhood has limited routes for ingress and egress. The Project is located in very close proximity to very high fire hazard and wildland areas. The site has been subject to numerous evacuation orders within the last few years due to increasingly frequent fires affecting nearby open space and regional parks.

The single access to the Project forms an awkward T-intersection with Simon Ranch Road and Pavillion Drive. The access road is required to meet minimum pavement widths of 28 feet under County regulations. For most of its length, the unnamed access road meets minimum widths for paving, but there is a “pinch point” near its intersection where the roadway appears to drop below the minimum requirements. Project exhibits do not reveal the actual paved width, but largely ignore the impact of the “pinch point.” The Project does not own additional land to widen the access road and it is unclear the road meets fire standards. The DEIR ignores the potential impact of the “pinch point” and does not show the actual paving or right-of-way width for the entire length. The Project proposes single-side on-street parking which reduces emergency access to a single lane. County fire requirements appear to need at least two lanes of unimpeded access for fire trucks and other emergency vehicles. Driveways for duplexes must be at least 16 feet wide and 19 feet long, and it appears that individual driveways may not satisfy County standards. Instead of ignoring issues, the DEIR should address community concerns about access adequacy.

In most communities, small subdivisions are required to provide both primary and secondary access routes, especially or near (less than .75 mile) in high fire risk areas. In this case, an automobile accident or other blockage could easily trap future residents on the site in the event of an emergency. The same evacuation roads will be used by both Project and existing residents, despite their narrow width and twisty design. Contrary to future Project residents, current Club users are likely to access the site only during daytime hours when fire risk is low, and to be able to drive home if advised of fire risk. In contrast, the Project will expose more than 100 new occupants and their homes to a 24-hour risk of fire or other natural disaster.

The County has not adopted evacuation plans, so it is unclear how Project residents will respond in the event of inevitable and likely worsening fire and evacuation orders in the future. At a minimum, it is likely that Project occupants will respond to evacuation orders by packing valuables into any available automobiles, potentially adding more than 70 laden cars to the already undersized local street network. The DEIR essentially ignores the Project’s potential to overload the local street network in the inevitable event of a nearby fire. It is not enough to excuse the lack of analysis by asserting the County has not adopted applicable standards. In the absence of an adopted evacuation plan, the County must consider the specific facts of this case and their potential environmental impacts. Under CEQA, the fact the County has not adopted significance thresholds does not eliminate its obligation to analyze safety risks obvious on their face.

The DEIR suggests that residents would be able to walk to safety in the event of fire by crossing private property and scaling one or more fences. This is not a credible evacuation route, especially for the down-sizing empty nesters targeted by the development. Long experience with

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fire behavior indicates that residents will default to known routes unless alternative evacuation routes are publicized and signed. In most cases, evacuees will use automobiles to flee because they can bring pets and other valuables. It is extremely unlikely that pedestrian routes will be utilized by Project residents except in situations where insufficient evacuation notice is given. Previous comments point out that the Club has effectively served as a staging area and potential “shelter in place” center for area residents, both uses that would be eliminated by the Project. So, rather than offering safety to surrounding residents, the Project will increase the number of vulnerable residents on the twisting local streets by a substantial percent. The DEIR does not discuss the availability of emergency services, given the Project’s apparent non-conformance with local access requirements.

In summary, the DEIR wrongly concludes that site-specific fire hazard analysis is not necessary because the County has not adopted applicable performance standards. Under CEQA, performance standards allow the lead agency to avoid detailed impact review by demonstrating compliance with adopted rules. In the absence of performance standards, the DEIR was required to independently evaluate the significance of the Project’s environmental impacts. Given Project design and its location near high fire risk areas, the DEIR’s discussion of hazards is woefully inadequate, in addition to the complete absence of mitigation measures.

iii. The DEIR Fails To Address Critical Loss of Recreation and Open Space

North Tustin is noticeably lacking in active open space and recreation. In comparison to other unincorporated areas, North Tustin has a fraction of the open space provided in other areas. The Project actually reduces the amount of active recreation and open space available to future and current residents by more than 5 acres, while providing fees for only a fraction of the lost recreation. Under the County’s Parks Code, the Project will provide funding for only a fraction of an acre of parkland at an unspecified location, while replacing a profitable 5+ acre recreation use serving hundreds of area residents.

There are two problems with the proposed DEIR’s assessment of the Project’s impact on recreation and open space. First, North Tustin is essentially built out and no neighborhood parks are proposed (or available) within the area served by the Project. Despite the Project’s payment of park mitigation fees, the DEIR provides no assurances that adequate replacement park facilities will actually be provided to serve Project residents. Unless the Project provides assurances that park facilities serving the community will actually be built, both State law and precedent provide that payment of fees is not adequate mitigation under CEQA.

Second, CEQA requires mitigation of the loss of more than 5 acres of open space and active recreation serving the community for more than 60 years. Under *Erlich v. City of Culver City* (1993) 15 Cal. App. 4th 1742, the County is entitled to demand mitigation for the Project’s impacts on the availability of private recreation in North Tustin. Given that the existing Club is acknowledged as a profitable private use serving hundreds of community residents, the County is not required to allow its replacement with townhomes serving a handful of upscale homeowners, many of whom are expected to live in the community now.

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Under CEQA, the DEIR's discussion of recreational and open space impacts is wholly deficient. It wrongly assumes that the County has no choice but to allow high-end residential development on the site, regardless of environmental impacts resulting from loss of long-time economically profitable recreational uses that demonstrably serve the existing community. In fact, the DEIR does not even acknowledge the loss of existing recreational opportunities as an environmental impact or propose mitigation measures to reduce the loss. Further, the DEIR fails to demonstrate that the Project's impact fees will actually be used to mitigate expected additional demand on recreational resources.

SB 330 does not give the developer a pass on analyzing and mitigating impacts from new residential development, especially when it is inconsistent with applicable zoning. The DEIR must be revised and recirculated to acknowledge the Project's significant adverse impacts on existing recreation and open space, along with its failure to identify new recreational opportunities to be purchased with required impact fees and the need to find other opportunities for private recreation to serve North Tustin. Unless the DEIR provides assurances of adequate parkland development servicing the existing community, and mitigating loss of private recreation, it is inadequate under CEQA.

iv. The DEIR Ignores Serious Incompatibility With Surrounding Development

On its face, the proposed Project is incompatible with surrounding development, as required by the County's General Plan. Project density is more than triple adjacent residential development within unincorporated areas. The majority of the Project, 34 out of 37 units, will be duplexes, while North Tustin is almost entirely occupied by single-family detached homes. The Project will create an island of high-density, significantly smaller multi-family units in a long-established large-lot residential development.

The County has addressed the need for multi-family housing through the North Tustin Specific Plan which sets aside sufficient areas for higher-density development along major arterials, in accordance with County planning principles. The Project is located at the intersection of two local streets, with a twisting web of access routes to off-site arterials. Under the County's General Plan, there is no possibility a high-density multi-family development of the type proposed by the Project would meet adopted development principles. Regardless of SB 330, the Project is the wrong development at the wrong place.

The Project is also inconsistent with the surrounding area in that it proposes a condominium development with collective responsibility for maintenance of common areas. Under CEQA, the County is entitled to know whether adequate funding and management will be ensured through Project approval. In contrast, all of the surrounding lots are the sole responsibility of the recorded owners, who cooperate voluntarily to maintain the community.

In summary, the DEIR fails to address the incompatibility of the high-density condominium Project with surrounding single-family half-acre lots. It simply assumes the County has no

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discretion to refuse a wholly incompatible residential development under SB 330. Again, this is incorrect. Nothing in SB 330 requires the County to approve an incompatible high-end residential condominium that proposes to replace an economically viable recreational use serving the community for more than 60 years.

Under both CEQA and SB 330, the County is required to analyze and mitigate for the impacts of constructing a high-density multi-family development in the middle of an established low-density single-family enclave with no transit access, no secondary access, multiple evacuation orders due to the close proximity of high fire risk areas, inadequate parkland, numerous cul-de-sacs, unspecified evacuation routes, and elimination of an important recreational amenity that has served the community for more than 60 years. The DEIR must be revised and recirculated to address these obvious environmental issues.

v. The DEIR Fails to Consider Project Design Defects

The DEIR also fails to consider multiple Project design defects such as undersized driveways, poor emergency access, wildfire and evacuation controls, lack of on-site open space, undersize lots for the community, and potential water quality and biological impacts, as raised in comments on the MND. The Project appears to have been designed to maximize the number of units without considering the surrounding community, access and other impacts.

D. THE DEIR IS INADEQUATE BECAUSE IT PROPOSES VIRTUALLY NO MITIGATION FOR ENVIRONMENTAL IMPACTS

The discussion in Section C above demonstrates the DEIR's failure to identify and address the Project's significant adverse impacts. In addition, the DEIR fails to propose mitigation measures that may be available to reduce the Project's significant adverse impacts. Nothing in SB 330 prevents the County from requiring the Project to mitigate its impacts on the surrounding environment, including homes of the FCA.

CONCLUSION

For all of the above reasons, the DEIR for the Ranch Hills Planned Development is deficient and must be recirculated after revision. Further, even if the deficiencies in the DEIR could be corrected, the Project does not meet minimum requirements under the Orange County General Plan, Zoning Ordinance, and Subdivision Code. Although the Project requests two variances, there is no explanation for why the Project cannot be constructed in compliance with generally applicable rules, nor does the DEIR identify a series of other inconsistencies that would require variances before Project construction.

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FCA appreciates the County's close attention to this Project and the need for complete review of its impacts on North Tustin and consistency with County regulations. We are available to respond to any questions or to provide additional information in support of this letter.

Sincerely,



Deborah M. Rosenthal, Esq.

Enclosures (under separate cover)

cc: Orange County Board of Supervisors
Orange County Planning Commission
Richard Nelson, FCA rnelson@fcahome.org

Canning, Kevin

From: Glen Duvel <Glen@duvel-law.com>
Sent: Wednesday, June 29, 2022 8:49 AM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am a long-time resident of Tustin and member of the tennis club, and I strongly oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – *traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
2. **Fire Safety** – *Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
3. **Recreation / Open Space** – *the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on*

residentially zoned land. The County of Orange sets a “zoned” parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

4. **Recorded Land Use Covenant** - *Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.*
5. **Affordable Housing** - *the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.*

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents’ safety above the monetary gain of a few.

Sincerely,

Glen Duvel



Glen D. Duvel, Esq.
[DUVEL LAW, APC.](#)
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Orange, CA 92868

P: 714.542.5100
www.duvel-law.com

Canning, Kevin

From: Glen Piper <gpiper@peacockpiper.com>
Sent: Wednesday, June 29, 2022 8:05 AM
To: Canning, Kevin
Cc: 'kirkwatilo@gmail.com'
Subject: Opposition and Concerns Regarding Rezoning of the Tustin Hills Racquet Club Ranch Hills Planned Development (PA180034 / VTTM 18119)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

Thank you for the opportunity to comment on the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised that I vehemently oppose any zoning changes to and development of the Tustin Hills Racquet Club property located at 11782 Simon Ranch Road, Santa Ana, CA 92705 (hereinafter “THRC”). This zoning has been in place since before the Racquet Club was built in 1958 and changing the zoning will be catastrophic to the North Tustin community.

A. Opposition to Proposed Rezoning and Re-Development of THRC Property:

My family and I live on Racquet Hill (the street is aptly named because of the THRC) and our home is adjacent to the THRC. We purchased this home in North Tustin approximately nine years ago because of the larger lot sizes, quiet neighborhood and because the area was already built out. This area had already been significantly “developed” when the narrow Racquet Hill streets were completed in 1976. We moved from Irvine to North Tustin because of North Tustin’s unique character and environment of less dense housing and single family residents on larger lots. Moreover, we specifically purchased our home on Racquet Hill, adjacent to the Racquet Club, because of the open space and recreational

opportunities it provides to my family, such as tennis, pickleball, swimming and walking.

When purchasing our home, we relied upon the County of Orange's zoning of the area, with its large lot sizes and specifically the zoning of the THRC as agricultural/recreational. We were comfortable that the THRC property next to our home could not be redeveloped for housing. We never imagined the THRC would be, or could be, rezoned and redeveloped into the very same high density housing we moved away from in Irvine. This is not a criticism of Irvine, but planned communities with high density housing such as Irvine also plan for open space, parks and other recreational facilities. North Tustin is not a planned community with a master plan and CCR's to govern property uses and provide for important things like open space, parks, pools and recreational facilities, rather we only have the County's zoning to rely upon. Much like my family, the other neighboring homeowners have similarly relied upon the County's zoning when purchasing their homes here. The current zoning must be protected to preserve the unique character of the area, our property values and the amenities and recreational uses provided by the THRC property.

Our family is a member of the THRC and enjoys all that it offers both to its members and the local community. Our use of the facility includes tennis, pickleball, the pool, children's tennis camps and clinics and the banquet room for school functions, community meetings and other special events. My wife also belongs to a tennis league through the THRC which plays against other tennis leagues from surrounding Orange County communities. We have also played together in "couples leagues" organized through the Club. If THRC is rezoned for condominiums, the THRC will be closed and this will require THRC users to drive to other cities such as Anaheim, Irvine or Yorba Linda (as the closest) to play in leagues. This will eliminate my wife and likely other tennis players' ability

to play regularly because these other tennis facilities are too far to travel to while juggling busy family and work schedules. Rezoning the property will force our neighbors to seek recreation in other cities and eliminate this valuable community gathering place that is so vital to providing a sense of community within North Tustin. Even if it is possible for my family to still participate in tennis activities at a club in another city, it will add more vehicles (and pollution) to our already busy streets and highways because of having to commute to these other cities for league play and other tennis related activities.

THRC serves the community at large by hosting tennis matches, camps for children, swimming lessons and family pool memberships. The banquet facility also provides an affordable alternative to other Orange County venues which are either too large or too expensive for weddings, Bar Mitzvahs / Bat Mitzvahs, Quinceaneras / Quinceneros, school events and other functions, such as church services, funerals, school and sports team fundraisers and community gatherings. These events allow residents of North Tustin and surrounding cities, including Tustin, Santa Ana, Orange and Irvine to become friends, neighbors and a community. Club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well.

The Developer, Ranch Hills Partners, LP's partners, principals and employees (hereinafter the "Developer") are not citizens of North Tustin and do not have a vested interest in our community except to maximize its profits by squeezing in as many homes as possible on the THRC property. The Developer's project seeks to build high density housing of 37 condominium units on small 5,000 sq. ft. lots, which is inconstant with the contiguous surrounding residential houses which consist of large half acre lots. The construction, anticipated to last for over 2 years, and the high density housing will negatively impact our home and the entire area

by eliminating several recreational uses and open space in the area (which is already lacking), increasing noise, dust and traffic and placing a strain on resources. Building high density housing behind our home will also result in years of construction, dust and noise and greatly reduce the quiet enjoyment of our home and yard. It will also have a dramatic effect on the short and long term value of our home.

The Developer has disingenuously claimed it is building these condominiums to address a claimed need for housing for “active adults of 55 years and older” and/or to address affordable housing needs in the North Tustin area. This claimed justification for the change in zoning is a complete fabrication and is not supported by any studies or even anecdotal needs for this type of housing in this area. The project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions. Ironically, although the Developer claimed the development was for older adults, the actual condos consists of two story condos which is difficult for older adults to live in. Additionally, there is no access to public transportation or nearby amenities such as grocery or other stores that can be accessed by older citizens without driving. This does not seem to be a suitable location for the proposed development. Moreover, it does not justify changing the zoning that has been in place for generations and which homeowners, such as ourselves, relied upon when we purchased our home on Racquet Hill. The THRC property is zoned for agricultural/recreational uses and the owner of the Club was aware of this when he purchased it. The zoning must not be changed without substantial justification and maximizing profits for a small group of out of town Developers is not a substantial justification that warrants this significant change in use which will be detrimental to the community.

B. Draft EIR Not Adequate:

First and foremost, I am opposed to any change in the zoning because the surrounding community has relied on the current zoning when purchasing their homes, the proposed changes are inconsistent with the surrounding neighborhoods and there is no substantial justification for the change. I do not believe the draft EIR adequately addresses the significant environmental impacts of the proposed change from a recreational open space use of the property to high density housing.

1. Traffic and Circulation:

Traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. The construction and high density housing also raise safety concerns for the children and adults in the area that ride bikes, walk and play. The increased traffic on the windy narrow roads leading to the single access point for the proposed development raise major safety concerns for all residents.

The traffic study methodology in the EIR is flawed and does not adequately reflect the true potential impacts. Traffic from likely over 100 new residents (which will be present all day and all night, unlike with the current THRC which closes at night) will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.

2. High Density Housing Will Eliminate North Tustin's Only Open Space, Limit Recreational Uses and Impact Aesthetics:

North Tustin does not have any community parks or other recreational facilities. The THRC is the only open space/recreational facility in the area and it provides for a myriad of recreational uses which increases the overall physical and mental wellbeing of the community. The EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, as noted above the Club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community. The proposed Development will eliminate this important recreational center, which includes uses such as tennis, pickle ball, swimming, lawn activities, an exercise gym and banquet facilities for events. Although the club is private, it is still accessible with different types of tennis memberships, summer pool memberships, kids camps, swimming lessons and social events which do not require membership. Moreover, membership at the Club is open to any member of the public who would like to join.

Additionally the proposed Development will limit pedestrian access between neighborhoods because it will eliminate the pedestrian pathway between Racquet Hill and Simon Ranch. This will cut one portion of the neighborhood off from the other and require people to drive between the two areas. It will also eliminate very popular walking routes which currently allow the residents to walk a loop and spread pedestrian traffic throughout the surrounding area rather than concentrating walkers on the same streets. The proposed Development will create a situation

where there is only one way in and one way out for pedestrians. This also creates a safety concern for emergency evacuations because it will eliminate another potential pedestrian evacuation route. The Development will eliminate a popular walking path which provides access for residents to walk and bike through this area of North Tustin.

The new development will also impact the views and open green spaces which is wonderful for all residents and visitors who come to this area. For the homes immediately adjacent, we will now have houses and roof tops to look at, rather than the open space provided by the current use and zoning. This is a significant impact on the aesthetics of the neighborhood.

3. Impact on Wildlife:

We do not believe the EIR adequately addresses the true impact on the wildlife that the proposed change in use and construction would have. Although the THRC property is “developed,” it was built over 60 years ago and has remained substantially the same ever since. THRC provides a habitat for wildlife, including bob cats coyotes, hawks, owls, bats and wild parrots which nest in its trees and use the THRC as hunting grounds and as a wildlife corridor. This is to name just the wildlife I have personally observed and which has become more prevalent with time. Just as THRC and its adjacent walking path is used by people, it is also used by wildlife to access the surrounding areas. This access and habitats will be eliminated by the new Development and we believe will have a more significant impact on local wildlife than is outlined by the EIR (which only mentions observing rodents).

4. Other Concerns Regarding Increased Strain on Local Resources, Safety Concerns and Pollution:

Both during construction and after construction, this project will place a significant strain on the North Tustin area, which I do not believe has been adequately addressed by the EIR:

- a) Increased demand for police and fire services. There are also serious fire safety concerns. Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
- b) There will be an increased noise (both during construction and thereafter) due to the construction of an additional 37 more homes, increased traffic and corresponding greenhouse gasses and higher water usage.
- c) Increased pedestrian and vehicular traffic at all hours create safety hazards and concerns for both drivers and pedestrians since the surrounding streets which have no sidewalks and little lighting.
- d) Increased lighting impacts with the addition of street lights and houses. Unlike the Racquet Club which closes, the housing lighting will be 24 hours a day.
- e) The Development will eliminate an area that can be utilized by first responders as a staging area and/or relief center in time of emergency. It will also increase congestion and reduce possible evacuation routes, when evacuation of the area is necessary in times of wildfires and earthquakes.

- f) Water quality concerns due to increased pollution from storm water runoff from the added streets (the addition of cul-de-sacs and roads) and vehicular traffic.
- g) Increased greenhouse gas emissions from construction and increased traffic.

5. Recorded Land Use Covenant:

The residents of the area are also the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.

In summary, the THRC property should not be rezoned and redeveloped. This will destroy a valuable community asset, it will change the special nature of the adjacent neighborhood and North Tustin at large by allowing for “spot rezoning” for high density housing. It will increase noise and traffic both because of the addition of 37 housing units, but also because people will have to drive outside of North Tustin for the services currently provided by the THRC (e.g. community events, swimming, tennis, etc.). The ill-conceived project also raises serious life and safety concerns and impacts wildlife. We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents’ safety above the monetary gain of a few.

This important community asset has been in use for over 60 years and cannot be replaced once it is lost.

Respectfully submitted,

Glen Piper
2182 Racquet Hill
Santa Ana, CA 92705



Glen Piper | 100 West Broadway Suite 610, Long Beach, CA 90802 | gpiper@peacockpiper.com | Phone: +1 (562) 320-8885 | web: www.peacockpiper.com

Canning, Kevin

From: schrimnerx <schrimnerx@cox.net>
Sent: Wednesday, June 29, 2022 10:22 AM
To: Canning, Kevin
Subject: Racquet club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear mr. Canning. PLEASE don't sell us out to real estate developers. My wife and I have been in our home since 1994. We love the rural atmosphere combined with proximity to shops, restaurants, etc. The addition of high density housing would destroy the atmosphere which we have enjoyed during the last 28 years. We would have no desire to move into high density housing in order to stay in the area because the entire character of the area would have changed. Thanks for your consideration. Greg and Carol Schinnerer

Sent from my Verizon, Samsung Galaxy smartphone

Canning, Kevin

From: Greg Yi <greg.yi@cox.net>
Sent: Wednesday, June 29, 2022 4:56 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development (PA180034/VTTM 18119)

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

See attached letter.

Sent via Email

September 29, 2022

Kevin Canning
601 N Ross Street
PO BOX 4048
Santa Ana, CA 92702-4048

Subject: Ranch Hills Planned Development (PA180034 / VTTM 18119)

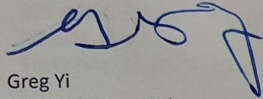
Dear Mr. Canning:

My family resides a few blocks from the planned development. We strongly oppose the proposed high-density condominium development known for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¼ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,



Greg Yi
11592 Plantero Drive
North Tustin, CA 92705
greg.yi@cox.net

Canning, Kevin

From: Canning, Kevin
Sent: Wednesday, June 29, 2022 11:14 AM
To: Gregg Klang
Subject: RE: Document for EP 29 / 06 / 2022

Please submit your comment in a text (Word) or PDF format

We cannot accept downloads from an unknown source

Kevin Canning | Contract Planner | OC Development Services / Planning
601 North Ross Street | Santa Ana, California 92701-4048
714.667.8847 | kevin.canning@ocpw.ocgov.com

Visit us online for permitting applications/project status at <https://myoceservices.ocgov.com/> or general questions and assistance call 714 667-8888

PLEASE NOTE: My primary work days are now Tuesday thru Thursday, replies to messages received on other days may be delayed.

From: Gregg Klang <gklang@cerndevice.com>
Sent: Wednesday, June 29, 2022 8:51 AM
Subject: Document for EP 29 / 06 / 2022
Importance: High

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hi,

Please refer to the document I've shared with you using App Box.

Kindly [Review Document](#) for our new project.

Let me know if you need anything!

Thanks

Gregg A. Klang – Cern Corporation, CEO
949.306.7160 | GKlang@CernDevice.com



The information in this transmittal (including attachments, if any) is privileged and confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Thank you.

Canning, Kevin

From: Hollydjoseph@gmail.com
Sent: Wednesday, June 29, 2022 6:59 AM
To: Canning, Kevin
Subject: Comments to Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning –

My husband and I purchased our home in 2016. At the time, our three young children were ages two, four and six. Since that time we have made this neighborhood and community our home. My children attend the local public elementary school and each of them have taken tennis clinics, lessons and attended community events at the Tustin Hills Raquet Club. Our family regularly bikes, jogs and walks our dogs in the neighborhood. While my comments below outline logistical and regulatory reasons that the condominium development should not be allowed, I implore you to value the heart of this community over one developer's short term gain.

I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

- 1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.*
- 2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.*
- 3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on*

residentially zoned land. The County of Orange sets a “zoned” parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,

Holly Joseph

Sent from my iPad

6/29/2022

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

1. **Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
2. **Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within ¼ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
3. **Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
4. **Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
5. **Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely,



Isabel Martinez

2052 Valhalla Drive

Santa Ana, CA 92705

Regarding the Tustin Hills Racquet Club Site:

I believe in progress. The site in question is located within a very established area called Red Hill Ridge. Since the 60's there has been a place for residents of ALL of N. Tustin, Red Hill Ridge and Santa Ana to commune, play cards, play tennis, hear a motivational speaker, mentor youth, include elderly and bind strong relationships for life.

The next owner operated this gem in a manner far less than its highest and best, but still it survived while benefiting the many area residents and families. Now he FINALLY gave up!! He had received SEVERAL lucrative offers from buyers- ready and willing to perform and change the condition of the club. The PROGRESS was stifled by the owner. He held back progress of a community hub. He did not *allow* progress. He was a miser, and hoarded the potential just to sell out his own community.

So, let's talk about PROGRESS: We need this! Housing shortages and higher density are currently one of the MOST important topics of decision throughout our state! However, the price point for the proposed development homes are WELL ABOVE "affordable housing" -plain and simple- it does not provide that *type* of needed housing.

We as a community want to see PROGRESS. We believe in it. We agree with the county and city to create new apartments, affordable housing, Rezone office/retail into housing and seriously make a REAL effort to help our need for housing. Higher density is where it is at!

But this Red Hill Ridge IS already a performing and valuable place FOR all these people, their kids, the grandparents, widows and widowers, the millennials and Gen Z's. The consensus is strong to suggest this:

The highest and best use for Tustin Hills Racquet Club is to ALLOW PROGRESS.

Allow this zoning to continue: allow the place to undergo renovation; create the long overdue PROGRESS everyone is truly READY for and have wished for- for well over 25 years!

There are visions of coffee carts; taco stations; Asian cuisine; Beer/wine happy hours; games and competitions; increase pickleball and tennis; Bridge night; pool uses; putting green or even a golf hole simulator- *A thriving community life*- Celebrate students who excel and a place to belong: True PROGRESS is BUILDING, not tearing down this site.

I urge you to think- We need housing. This site will not even crack the tip of the iceberg to provide "housing". Instead it destroys a fantastic IN PLACE.

Ready to go community gathering place that serves all of Red hill Ridge, N. Tustin and Santa Ana people.

Please, we implore you to help ALLOW the highest and best use... FINALLY... for this site!

We are the voice that needs to be *heard*.

TRUE PROGRESS = KEEP THE TUSTIN HILLS RACQUET CLUB ZONING and Allow THE TRUE PROGRESS we have been denied.

-Jennifer Esser

(Maui country club- 700 members- similar parking- pickleball is thriving! Generations are thriving; tennis, dining, swimming, and it is awesome!

Jennifer Esser
Senior Broker- Camelot West
714-731-7000

Canning, Kevin

From: Scolaro, John <jscolaro@hs.uci.edu>
Sent: Wednesday, June 29, 2022 7:37 AM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Tustin Hills Racquet Club zoning

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr Canning, thank you for taking a few minutes to read this email. I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. I am vehemently opposed to ANY zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since 1958 and any change to the zoning would be devastating to the North Tustin community. The Racquet Club is a “gem” of the neighborhood. It provides families the ability to enjoy tennis, pickle ball and swimming. In addition, it is also important for the community in general who appreciate and respect the presence and purpose of the Racquet Club in our community. The Racquet Club was purchased as recreationally zoned and must stay that way. The new pickle ball courts have been an amazing addition to the club and brought additional enthusiasm to the membership of the RC. The plan to put high density housing in that area is downright scary and would be a complete travesty. We moved into North Tustin in 2018 and have enjoyed raising our family in this beautiful and unique community. After hearing about this zoning issue, I really have a hard time believing that the elimination of a recreational area and construction of high density housing is in line with the history, structure or wellbeing of the community in any way shape or form. I also have significant safety and traffic concerns about the construction and maintenance of the units. In addition, we live in an area where the trees and wildlife are sacred elements. Any sort of significant construction would inevitably cause irreversible harm to the environment and the habitats of animals who make our community their home. What public official would stand behind this plan...wipe out a recreational park that is important to one of the older established communities in Orange County to construct high density housing? I sincerely hope the County does the right thing by leaving the zoning in place.

Thank you for your consideration,

The Scolaro Family
11772 Las Palmas Drive

John A. Scolaro M.D., M.A.
Chief, Orthopaedic Trauma
Residency Program Director
Associate Professor of Orthopaedic Surgery
University of California, Irvine
<https://orthopaedicsurgery.uci.edu/>

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Canning, Kevin

From: Julia <juliadahl@sbcglobal.net>
Sent: Wednesday, June 29, 2022 9:27 AM
To: Canning, Kevin
Cc: 'Kirk Watilo'
Subject: Tustin Hills Racquet Club EIR Response

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning –

I am writing in response to the Environmental Impact Report (EIR) for the proposed redevelopment of the Tustin Hills Racquet Club and have lived very close to the Club's entrance for more than 20 years. I continue to be strongly opposed to rezoning this land and take issue with many of the assumptions and conclusions in the EIR. The overall tone of the project proposal feels disingenuous with the obvious aim being to present what is necessary to get county permission to build and I feel that the county has a responsibility to established home owners to evaluate the validity of the project aims in addition to its actual impact when considering a project that would so drastically impact an entire community.

From the objectives stated in the EIR (1.4):

OBJ-1 states that the project is to increase housing units in North Tustin “especially for people that want to downsize but stay in the same area”. The developer is falsely trying to present this as an affordable housing option for seniors. It wouldn't make financial sense for residents to sell their existing home to purchase a \$1.5 million property with the new tax basis on a fixed income. And if it does, then these are not the buyers that affordable housing initiatives are aimed to help. Additionally, aging longtime area residents would not choose to move to a 2 story condo when they could stay in their single story homes. There is no public transportation or local grocery store in the area which most communities for seniors are planned around because residents do less driving.

OBJ-2 implies that by doing the project in an environmentally safe manner, there would be no long term impact on the community from doing the project. I'm concerned that such a major project could affect later hillside stability in the area as the Club lot sits below hillside homes on two sides. In addition, there are many mature trees and landscape in this open space that are home to a large number of species including owls, falcons, bobcat, wild parrots, and many others. Some greatly help keep area rodents in check. Even with replanting after construction, there is a risk that these animals may never return. The most logical way to avoid negatively impacting the environment is to leave it alone, especially if it does not need to be done and provides no positive benefit for the community.

OBJ-3 falsely claims that the Project will “reduce impact on the circulation network and reduce traffic”. Adding 37 residential condo units with limited parking would unequivocally increase the volume of traffic 24 hours a day/7 days a week and would result in compounding existing safety issues that already exist because of the tract road layout, natural geography and community characteristics. Traffic generated by the Club is not the same as residential traffic.

I question the results of the traffic study both because the results presented in the initial MND overstated the numbers based on false assumptions about club usage (when in fact they were negligible) and because the new study is using a different methodology which looks like it would skew the results to appear more favorably to sway the County for approval. Just as the results in the MND were questioned, any traffic study result that shows traffic would actually be reduced by adding so many dwelling units must be questioned by the County.

If 100-130 cars were added to the neighborhood (3-4 per unit), making multiple trips per day, that would dramatically increase volume, especially during morning and evening peaks. The increase would be on streets that are both narrow and windy in many places, all without sidewalks and street lights. The EIR focuses primarily on general volume and

doesn't really address safety issues created by adding so many people and cars to the area surrounding the Club land. The club entrance is not at a proper intersection and is also very close to two blind intersections because of natural hills and curves (Simon Ranch Rd/Valhalla/Liane LN). Currently, pedestrians cross in the middle of the road (no sidewalks) and increased volume would increase the likelihood of accidents. The Project plan shows one small parking place per unit so overflow parking would have to be on surrounding streets right near this dangerous area of Simon Ranch/Valhalla/Liane Ln. When street parking has happened in this area from the occasional party or event, it creates a visibility problem which would become permanent and certainly increase the likelihood of accidents. There was a recent serious car accident at the corner of Simon Ranch and Valhalla outside of club hours which could have been much worse had there been oncoming traffic. Because there is just one entry and exit point from Red Hill Ridge, the intersections of Beverly Glen/Browning/Simon Ranch, Beverly Glen/Simon Ranch/Skyline and Browning Avenue already have some traffic safety risk during peak hours and the EIR fails to address how those issues would be compounded by increasing that volume.

In regard to fire safety, the EIR appears to ignore how increased traffic volume would impact the existing neighborhood in the event of a fire or other emergency given that there is only a single entrance and exit point. The number of red flag days has increased dramatically over the past decade and is made worse by drought conditions and a longer warmer season, so the County has a responsibility to make safety a top priority for existing residents. This is a high fire risk zone and residents are acutely aware how quickly we could be trapped in our neighborhoods especially if emergency vehicles could not enter due to road congestion. The open space at the Club can be used as a staging area for emergency vehicles and the EIR doesn't show what the alternative would be if the Club land was eliminated. Currently, large fire trucks cannot turn around on my street (Liane Ln) or the other cul-de-sac streets, having to back out when leaving. Adding additional residents, traffic volume, and overflow parking on side streets could create a situation where fire trucks might not be able to even enter the neighborhood at all. A major fire is devastating for any community but seems like it would also be a public relations nightmare for County officials if they knowingly increased fire safety risk by adding density to an area that couldn't handle any more.

The proposed density increase and changed aesthetic from building these condos is a drastic departure from what has been the established community norm in the North Tustin area. All of the area homes are on minimum ½ acre lots and follow the strict guidelines of the original area plan which included the existing Club and open space. The EIR fails to address how the loss of this area asset would be addressed let alone what the justification is for removing it at all. The Club is a recreational facility that has been used by people in North Tustin and the surrounding areas for events, swim & tennis lessons, fitness and training classes for decades. I noticed that the EIR says that the Project would have no impact in terms of dividing neighborhoods, but in fact the Club land is crossed daily by pedestrians that live in the 2 neighborhoods on either side via an access path that join the Red Hill Ridge homes and the Racquet Hill homes which I personally have used multiple times per week for years. We have attended public school events and organization meetings that were held at the Club because no other comparable space existed in the area. This unique facility and green open space provides an obvious benefit to area residents while a new condo development does not. More importantly, there are numerous other condo complexes which would serve the developer's actual target demographic (not aging seniors) in parts of Tustin and Irvine so it makes no sense to destroy a unique parcel of land to create something that is not needed or wanted in the local community.

Like many other residents, my husband and I chose to move our family to North Tustin because of the unique characteristics of the area which included large lots, rolling hills, low density housing, and the quiet neighborhood that is expected on curving streets without stop lights or sidewalks. We specifically chose this area to leave a busy street in Costa Mesa and we paid a premium housing price to do so with the understanding that because of the original neighborhood plan and Covenant, there had to be conformity for any home construction in the area and that the Tustin Hills Racquet Club was not zoned for houses. Over the last 21 years, we have enjoyed all of those aspects of our neighborhood and respected the rules associated with the area. The previous Club owner and the new owner were both aware of the zoning rules and land use expectation and still have tried to disingenuously pitch their high density condo project first as a benefit to the community, then as senior housing, and now as affordable housing using inaccurate data and omitting critical information related to traffic, fire safety, and the impact on the community.

For all of the above reasons, I respectfully request that the project be denied.

Julia Dahl

2152 Liane Lane

Santa Ana CA 92705

Canning, Kevin

From: Julie Hellmers <julie.hellmers@gmail.com>
Sent: Wednesday, June 29, 2022 10:24 AM
To: Canning, Kevin
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Canning,

As a resident of North Tustin and a proud native of the area, it is incredibly sad to see the racquet club altered into a cookie cutter community.

The existing residential area is unique to Orange County. The proposed planned development will detract from the community and drive down property values, as well as introduce additional traffic congestion to the neighborhood.

Please show consideration and respect for the current residents by denying this development. It is encroaching on an already established and special area.

Please contact me with any questions or concerns. Thank you for supporting the tax paying citizens of North Tustin.

Sincerely,

Julie Hellmers
714-325-7404

Canning, Kevin

From: Kami Refa <kamirefa@gmail.com>
Sent: Wednesday, June 29, 2022 5:45 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development and Tustin Racket Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dr Mr. Canning,

This email is in regards to the EIR for the development in the location of the Tustin Hills Racquet Club. (PLANNING APPLICATION NO. PA 18-0034 (Proposed Redevelopment of Tustin Hills Racquet Club))

As a resident of North Tustin, I am vehemently opposed to the developers' proposed plans for the land. The plans are drawn to bring in the most profit for the developer without caring about the negative impact to the surrounding community.

My wife and I moved to North Tustin from a development similar to what is being proposed. We were drawn to North Tustin because it is not commercial and is a quiet and safe community to raise our daughter. Building higher density housing in this area not only impacts home values for single families (at the gain of profit for a developer), it impacts the community and the animals that live here in so many ways.

- My wife and I worked hard to save and buy a house in this community because of the houses with land. Not everyone wants that, but this is what people in this community need. And once that is allowed to change, the whole area changes. North Tustin loses its appeal. I don't know where else to go, other than further outside of Orange County, to get what we have here.

- North Tustin is the first community where we have lived in Orange County where we not only talk to our neighbors, we look out for each other, we are friends. There is an actual sense of community here. And the higher density housing will change that. Having lived in that type of community, we found that people don't talk to each other. It's not the same sense of community as it is here.

- There are plenty of areas in Orange County with communities with higher density housing and we keep seeing more of these being built. So there are options for the people that are looking for housing like this. But houses with land and privacy are getting more and more rare. We should preserve these lot sizes and communities.

- Impact to local children and schools. Our local school already has high student to teacher ratios. Are the current schools supposed to handle the influx of children that will come with this development?

- The Tustin Hills Racquet Club is recreational space used by the community. My daughter is learning how to swim there.

- The roads around the Racquet Club were not designed for this type of housing. There are no sidewalks. Talking walks will be more dangerous with the increase in traffic. And, from someone who

lives by a school, I have witnessed first hand how people speed down residential streets in the morning. I can only imagine how this will worsen with the overcrowding.

- We have owls that live on our property for a portion of the year. (It's amazing to peek in on the each day they are here!) They need the local trees and open areas to survive. The proposed development will hurt the local wildlife that live on these larger lots.

I know the North Tustin community is fighting an uphill battle against the developers. I'm guessing they live in large homes with a lot of land, the thing they are trying to hurt here. We would love to save the Racquet Club, but at the very least we need to save the lot sizes if new homes are built. At least then more people can enjoy what makes North Tustin great.

Thank you for your time and consideration in this matter.

Kami Refa

Canning, Kevin

From: Kathryn Lind <kathrynlind@gmail.com>
Sent: Wednesday, June 29, 2022 4:10 PM
To: Canning, Kevin
Subject: Opposition to proposed Redevelopment of Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mail to: Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
P.O. Box 4048
Santa Ana, California 92702-4048

Dear Mr. Canning,

The developer's plan is clearly designed to make him money at the expense of the North Tustin community that has existed prosperously for seventy five plus years. Let's support the people that have invested in the neighborhood for the benefit of all of us, not for the enrichment of one developer at the expense of the people that have made this community what it is.

The impending threat of losing the Tustin Hills Racquet Club (THRC) not only impinges on the lives of hundreds, but proposes critical revision of the community we've grown to know and love over the past eighteen years. When originally looking for a home to settle down and start a family in, the quaint atmosphere and charming neighborhood of North Tustin enthralled my husband and I despite looking in all areas of Orange County.

Please do not allow this developer to destroy our neighborhood by constructing high density units in place of this community treasure and beautiful green landscape. Not only will these high density units destroy the look and feel of our beloved neighborhood with ½ acre lots, but our narrow streets and the one way in and out of the neighborhood will not be able to handle the increased traffic to the proposed units.

Our three children were born and raised in this neighborhood. Over the years, we have benefited substantially from the activities the Racquet Club has to offer, including the pool and snack bar that my children raved about as camp goers during tennis camps. Fundraisers, birthdays, and the National Charity League meetings take place at this local spot, making the hundreds that visit this pristine location realize how crucial the Racquet Club is to the people that treasure it. We specifically chose to purchase our home at 2032 Racquet Hill for its convenient location just steps away from the THRC.

Do not rob kids of fond memories that can shape the rest of their lives by ripping away this source of fun and laughter.

Do not ruin the careers of future tennis players that practice at and rely on this establishment.

Do not continue to pollute our world with the unnecessary traffic and machinery that would be required to demolish the THRC.

Please protect the community of North Tustin that hundreds of families have come to cherish by denying this destructive notion to commence.

Sincerely,

Kathryn Lind

Canning, Kevin

From: Kirsten Antonius <kantonius@gmail.com>
Sent: Wednesday, June 29, 2022 2:51 PM
To: Canning, Kevin
Subject: THRC

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning-

I grew up on Highview, the street above the Tustin Hills Racquet Club. When I was young, we would sit on our porch and admire the helicopters landing at El Toro Marine base among the sounds of the tennis balls being hit at the club down below. It was all music to my ears and a reminder of the idyllic childhood I want to provide for my own children.

I now live with my own children in the Racquet Hill Community adjacent to the club. My kids play tennis there daily and my husband is a HUGE Pickleball player, playing there weekly with his colleagues and friends. The Loss of this club would devastate our family, not to mention the huge impact it would have on the surrounding neighbors.

The THRC site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are located on residentially zoned land. This is a big distinction. The County of Orange itself sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. THRC (only zoned parkland) represents a minuscule 0.24 acres/1,000 residents ratio – a far cry from the County's own standards!

Traffic generated by the proposed high-density development will have a significantly negative impact on traffic and pedestrian safety on our neighborhood streets. Many of our neighborhood streets are narrow, windy, have no sidewalks and minimal, if any, streetlights. § Residents living on or near "feeder" streets for commuters traveling from the freeways into the foothills (i.e. La Colina, Browning, Ranchwood, SE Skyline, Red Hill) will be greatly impacted by increased commuter traffic. § Given the number of walkers, bikers, children playing, etc., more traffic will certainly create safety issues on our already busy streets.

The roadway/access infrastructure of this community was designed in the 1960s for very lowdensity housing. The infrastructure was never designed to accommodate high-density housing as evidenced by the narrow streets, lack of sidewalks and lack of secondary access in/out of Red Hill Ridge. The Report does not address the physical limitations of the existing infrastructure and the fact that it will NEVER HAVE SECONDARY ACCESS. Furthermore, the access point is a very narrow driveway, Simon Ranch Road, the only access point in/out of Red Hill Ridge, is narrow and winding with no sidewalks for pedestrian evacuation. This was always intended to be a very low-density community and adding high-density housing and another 100 residents/vehicles with no secondary access is highly questionable for the life safety of residents and should be property examined.

Finally, The community is inhabited by many more species, namely bobcats, raccoons, coyotes, owls, hawks, falcons, migratory birds (swallows and parrots), rabbits, mice, gophers, snakes, and beehives. The proposed development will surely disrupt, displace, and potentially destroy this wildlife.

Thank you,
Kirsten Antonius
11572 Vista Mar
Santa Ana, CA 92705

Dear Mr. Canning,

I oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

Fire Danger

Red Hill Ridge is already an unsafe community with regards to fire danger. The location of the neighborhood is less than a mile from a Very High Fire Hazard Severity Zone, putting residents at risk every time a wildfire burns in the area. Additionally, there is only one access point at Simon Ranch Road, which could easily and quickly become compromised in an evacuation situation due to jumping embers, car accidents as residents rush to leave, emergency vehicle parking, etc. There are no sidewalks or streetlights to aid residents in their exit in the event that the road access becomes compromised. The community was not designed to allow for the safe evacuation of its existing residents in the event of a wildfire, let alone to account for the dramatic increase in resident volume that this Proposed Development would cause.

Regardless of your beliefs about the changing climate of our planet, it is an indisputable fact that wildfire occurrences have been increasing in past years. People across California have experienced the effects of these changes over the past several years, and one would be hard-pressed to find a Californian who hasn't been directly impacted by wildfire or who doesn't know a close friend or family member who hasn't been directly impacted. The geographic region of Red Hill Ridge is no exception, so all of the dangers outlined above are even more pressing as fire risk increases.

The EIR fails to consider the existing risks or the fact that increased resident volume will further exacerbate these risks. There will be significantly increased congestion at the single access road during an evacuation and reduced space for emergency vehicles to enter the area and/or park in the area. To call this proposed development irresponsible would be an understatement.

Traffic Danger

I grew up in Red Hill Ridge and have known from a very young age that the roads in the neighborhood are unsafe. I learned to ride a bike on Liane Lane, but did not venture off my parents' street on that bike until much later because the intersection at Liane Lane/Simon Ranch Road/Pavillion Drive/Valhalla Drive is so dangerous. My brother and I were not allowed to walk to school at Red Hill Elementary (only about a mile from our home) because of the dangers of that same intersection and the lack of sidewalks in the neighborhood. When I learned to drive, I was warned constantly of the driving dangers in our neighborhood. The winding and hilly nature of the road planning means that there are many blind turns and intersections. Just a few weeks ago, I witnessed a car accident on the corner mentioned above (Simon Ranch/Valhalla intersection). The driver was unfamiliar with the area and crashed into someone's front yard. Fortunately no one was seriously injured in this particular accident, but had there been another car driving up Pavillion and/or pedestrians present at the time (which would have been much more likely if there were an additional ~100 residents in the area), there could have easily been serious injury and/or death(s).

Increasing the number of residents in this community would lead to significantly increased vehicular traffic. The proposed development suggests limited garage and driveway parking for new residents, so there would also be an influx in cars parked on the street. Increased traffic and cars parked on the street would be not only disruptive and irritating to the existing residents, but more importantly these increases would heighten the danger of the already unsafe roads. This means putting more people at increased risk of harm. It is not in the best interest of any residents, new or existing, to put more cars on these roads.

Additionally, the EIR indicates that this new housing development will be geared towards older adults. I personally work in the senior housing and care industry and have a degree from the University of California, Berkeley in Cognitive Sciences with a focus in aging neuroscience. There are countless changes that occur in the brains and bodies of humans as we age. For many seniors, some of these changes impact driving abilities. Aging can cause declines in eyesight, hearing, and vestibular perception. These changes are all related to decreased reaction time, which is essential for driving abilities. I absolutely do not wish to stereotype older adults as bad drivers, but decades of neuroscientific and physiological research clearly indicate that most older people simply don't have the same precision of mobility, reactionary abilities, and vision focus that they had when they were younger. Putting more cars on already dangerous roads is risky, but it's all the more risky when those additional drivers are older.

Emergency Access

As described above in relation to fire danger, Red Hill Ridge is already in a compromised situation with regards to emergency access. In regards to fire danger, my focus was primarily about residents getting out of the community. However, there is an additional and significant concern about emergency vehicles getting *in* to the community (whether in a fire situation or otherwise).

There are multiple compromised individuals on my street (Liane Lane) who will be put at increased personal risk if this development takes place. Some examples:

- Audrey, an older woman, has been a neighbor of my family for my entire life. She has a full-time caregiver and uses a walker for mobility assistance. She is unable to walk without support. She would not be able to exit the neighborhood on foot, and if she had an emergency at home, vehicles would need to easily access her house. This could be impeded by increased congestion of vehicles (driving and/or parked on the street).
- Jim, a neighbor, was in a serious biking accident several years ago that left him unable to walk. He has extremely limited mobility and cognitive function. He is unable to walk on his own. He would not be able to exit the neighborhood on foot, and if he had an emergency at home (which happens often due to his fragile medical state), vehicles would need to easily access his house. This could be impeded by increased congestion of vehicles (driving and/or parked on the street).
- Matt, a young man down the street who grew up with my younger brother, uses a wheelchair. He drives a pickup truck with a custom lift that allows him to drive with his wheelchair in the truck bed. He would not be able to exit the neighborhood on foot.

This is just a handful of individuals on only one street in the neighborhood. If any residents of Red Hill Ridge or new residents of the proposed development were to be in a critical emergency situation and they could not receive necessary medical care because of an increased volume of

vehicular traffic and/or parked cars on already narrow and difficult to navigate roads, would the developers of this new housing plan be willing to take responsibility for lives lost? This is not addressed in the EIR.

Wildlife Disturbance

Red Hill Ridge is home to many long-time residents, human and otherwise. We have the privilege of sharing this neighborhood with beautiful and rare owls, along with wild parrots, coyotes, bobcats, etc. If the mature trees in which the owls reside are removed, their entire ecosystem will be altered and their species could suffer. Any change in a natural environment can disturb the animals who live there, and this housing development is no exception. Not only would open space and mature plants and trees be removed, but there would be ongoing loud noises, construction vehicles, etc. during the building phase along with increased human presence and new homes after the building is complete. All these changes could dramatically impact the survival of our non-human neighbors.

Senior Housing and Affordable Housing Plans

If the proposed development is intended to serve older adults and/or lower-income individuals, the EIR does nothing to actually address the needs of these populations. A project that was designed to serve the elderly should include accessible public transportation for the many seniors who do not drive, easy access to medical facilities, additional parking for caregivers, recreational and community spaces for social activities, nearby stores accessible by foot and/or public transportation, and additional support resources to facilitate the increasing needs of the elderly (ie bathrooms with roll-in showers and grab bars, fall-safe flooring materials, etc.). None of these features are outlined in the EIR. If the development is intended to be “affordable”, there is no indication of how a lower-income community will be served. Again, there is a lack of functional access to public transportation and additional support services that should accompany the physical buildings of an affordable housing plan.

Community Experience and Recreational Space

The Tustin Racquet Club is an integral part of the North Tustin community. While I don't believe that playing tennis is an essential part of life, I do think most Americans can agree that communities without central gathering spaces are not really “communities” at all. There have been countless weddings, bar and bat mitzvahs, birthday parties, community meetings, graduation celebrations, and more at the Racquet Club. Taking away this gathering space in the interest of one developer's profit is disrespectful to the North Tustin community. The Club is also a major recreational space in the region. Aside from the obvious tennis opportunities for Club members and non-members alike, the Club is home to the only community pool in the area. I personally learned to swim in this pool and I know countless other families have relied on this space to teach their children to swim. If the Racquet Club is removed, existing and new residents will not have that same type of space to gather, exercise, learn to swim, and enjoy their neighborhood community.

For the above reasons, I request that this unsafe and irresponsible building development proposal be denied. Not only would this development plan destroy one of the only remaining

community recreational spaces in North Tustin and change the landscape of an existing community, but it would put current and proposed residents in harm's way. The financial gain that an individual developer would enjoy is not worth the numerous risks and dangers that would be imposed upon existing and new residents of the community.

Sincerely,
Lauren Dahl

2152 Liane Lane
Santa Ana, CA 92705

Canning, Kevin

From: Lisa Refa <lisa.a.refa@gmail.com>
Sent: Wednesday, June 29, 2022 3:02 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development Draft EIR

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dr Mr. Canning,

This email is in regards to the EIR for the development in the location of the Tustin Hills Racquet Club. (PLANNING APPLICATION NO. PA 18-0034 (Proposed Redevelopment of Tustin Hills Racquet Club))

As a resident of North Tustin, I am opposed to the developers' proposed plans for the land. The plans are drawn to bring in the most profit for the developer without caring about the negative impact to the surrounding community.

My husband and I moved to North Tustin from a development similar to what is being proposed. We were drawn to North Tustin because it is not commercial and is a quiet and safe community to raise our daughter. Building higher density housing in this area not only impacts home values for single families (at the gain of profit for a developer), it impacts the community and the animals that live here in so many ways.

- The Tustin Hills Racquet Club is recreational space used by the community. My daughter is learning how to swim there.

- The roads around the Racquet Club were not designed for this type of housing. There are no sidewalks. Talking walks will be more dangerous with the increase in traffic. And, from someone who lives by a school, I have witnessed first hand how people speed down residential streets in the morning. I can only imagine how this will worsen with the overcrowding.

- My husband and I worked hard to save and buy a house in this community because of the houses with land. Not everyone wants that, but this is what people in this community need. And once that is allowed to change, the whole area changes. North Tustin loses its appeal. I don't know where else to go, other than further outside of Orange County, to get what we have here.

- North Tustin is the first community where we have lived in Orange County where we not only talk to our neighbors, we look out for each other, we are friends. There is an actual sense of community here. And the higher density housing will change that. Having lived in that type of community, we found that people don't talk to each other. It's not the same sense of community as it is here.

- There are plenty of areas in Orange County with communities with higher density housing and we keep seeing more of these being built. So there are options for the people that are looking for housing like this. But houses with land and privacy are getting more and more rare. We should preserve these lot sizes and communities.

- Impact to local children and schools. Our local school already has high student to teacher ratios. Are the current schools supposed to handle the influx of children that will come with this development?

- We have owls that live on our property for a portion of the year. (It's amazing to peek in on the each day they are here!) They need the local trees and open areas to survive. The proposed development will hurt the local wildlife that live on these larger lots.

I know the North Tustin community is fighting an uphill battle against the developers. I'm guessing they live in large homes with a lot of land, the thing they are trying to hurt here. We would love to save the Racquet Club, but at the very least we need to save the lot sizes if new homes are built. At least then more people can enjoy what makes North Tustin great.

Thank you for your time and consideration in this matter.

Lisa Refa

Canning, Kevin

From: Lois Lee <lois102201@icloud.com>
Sent: Wednesday, June 29, 2022 4:39 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Please SAVE the Raquet Club!!!

Dear Mr. Canning,

I **vehemently** oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

We discovered our incredible neighborhood (we live on Salt Air Drive) over 10 years ago and we were fortunate enough to move into our home in late 2017. It is one of the most beautiful and quiet neighborhoods in Orange County and our young family, including three young kids, love it here. Even without this potential condominium development, our traffic is quite busy. We have no sidewalks and minimal street lights. We walk with our kids around our neighborhood every day. With 100 new residents and the traffic it would create, I fear for the safety of not only our kids but all the families that walk in our neighborhood. There is no way the EIR traffic study adequately addresses this concern of everyone that lives in this area.

I've already been through two fire evacuations and building a high density housing in our neighborhood will cause a serious threat to our safety. If you lived in our neighborhood, you would also absolutely reject this proposal based on safety alone. On some mornings when folks are leaving the racquet club at the same time, I wait several minutes trying to make a left turn from Salt Air Drive to Simon Ranch Road. If the Santa Ana winds were kicking up and we had a fire evacuation, there would be no way our residents would all be able to get to safety in time.

Our kids are signed up for tennis camp later this summer. The EIR fails to consider the loss of the incredible recreational facility we have for not only our community but for folks that love playing tennis and now pickleball. Local schools also practice tennis here. This site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.

I think one of the most egregious violations is the recorded Covenant that runs with the Land between the residents of Tract 3883 and the developer because it is an issue with the neighboring HOA beneficiaries and was not part of the review process. The recorded land-use Covenant was executed to preserve its use into perpetuity for the express benefit of residents and not the Racquet Club owner or future developer. Accordingly, the use of this property belongs to the residents, not the Racquet Club owner or developer. Both the owner and Seller and Developer (Buyer) acquired the land with knowledge of this restrictive Covenant solely benefiting the community, which is reflective in the price paid by the Developer. That promise should be honored without the need for court intervention.

This project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Thank you so much in advance for listening to all of our comments on this very, very important topic for our community. We really, really appreciate it.

Sincerely,
Lois Lee

Canning, Kevin

From: LORI LEWIS CHEW <lorichew98@gmail.com>
Sent: Wednesday, June 29, 2022 2:50 PM
To: Canning, Kevin
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning-

I am a 20-year North Tustin resident living in the foothills near the Tustin Hills Racquet Club. I also lived at the corner of La Colina Drive and Browning Avenue for 15 years and am uniquely qualified to comment on commuter traffic. Our La Colina home sits along the primary commuter route for residents in the Project's neighborhood traveling to and from the 5 freeway (via Browning Ave. / La Colina Dr. / Tustin Ranch Rd.)

From personal experience - when we first moved into our home on La Colina, we were distressed with the number of vehicles that ran the existing stop signs at the 4-way stop. Initially, we would run outside to capture a license plate to report to the CHP but eventually gave up as, to our dismay, it was a regular occurrence. We had a small child and dogs at the time, and the amount of traffic and the lack of respect for the speed limit and stop signs became increasingly alarming. **On two separate occasions**, motorists turning north onto Browning at excessive speeds did not stop at the stop sign nor saw the existing drainage ditches and lost control. In both cases, the vehicles drove up our curb, across the middle of our driveway, demolished the mailbox immediately adjacent to our driveway and kept going. Had our young daughter been playing basketball on our driveway as she often did, it would have been a tragic ending for our family. We subsequently moved from that location over traffic safety concerns.

The addition of nearly 90 to 100 more permanent drivers proposed by the new development will only make traffic accidents more routine and will most certainly lead to dangerous, if not tragic, situations. It is also why the traffic analysis conducted in the EIR is so crucial to many of us residents. We all know how bad the traffic is now, and given the nature of the foothill streets – many without sidewalks or lighting – are deeply concerned about this safety issue.

In many places, the EIR appears to show a partiality towards a pre-determined outcome in favor of the Applicant. The most obvious example is the Traffic Analysis whereby the methodology used in the new EIR traffic study was **intentionally changed to the Applicant's benefit** from the prior MND traffic study. More on that below. Wildfire is another area where conclusions are drawn based on very rudimentary analyses. Overall, the EIR as it stands now raises serious credibility issues.

Case in point - Traffic. The methodology used in the EIR to determine daily traffic for the proposed residential development was **intentionally changed** from the methodology used in the MND traffic analysis, for no substantiated reason other than to reduce the traffic estimate for the proposed use. This is questionable at best given **nothing about the proposed development has changed in the last 20 months** and raises the obvious question "why the change in methodology?" unless you are intending to influence the outcome.

Throughout the entire EIR, the proposed Project is described as "single-family" residential. In fact, it is described as such in **eight different EIR sections**, no doubt, to convince the reader the project is a compatible

use within the community. In fact, nowhere in the EIR, not even on the Vesting Tentative Tract Map, is the Project described as “multi-family.” This is an important fact as it relates to the “new” EIR traffic analysis (see below).

In the prior MND traffic analysis, a “single-family home” trip generator factor was applied to **all 37** homes in the proposed development to derive a **349 daily trip count**. This factor was changed in the new EIR analysis whereby the “single-family” trip factor was applied to **only 3** (detached) homes and a **22% lower “multi-family” trip factor was applied to the remaining 34 (attached) homes, thereby reducing the projected daily traffic count**. No support was provided as to why this trip generator method should be altered from one analysis to the next. This new methodology is **wholly inconsistent** with the Project “single-family” description throughout the EIR and artificially generates a lower traffic count of 277 daily trips (72 fewer daily counts from the MND analysis).

Further understanding of events that have taken place between the time of the two traffic analyses shed light on the possible motivation behind the methodology change. The EIR now relies on an actual traffic count for the existing use which generated, coincidentally, a **349 daily traffic count**. This actual ‘existing use’ count produced a traffic number **equal to the traffic count projected for the proposed use in the MND**. **This inconvenient outcome nullifies the prior conclusion that the proposed use will have a reduced impact on the community. This likely explains why a new methodology, producing a lesser proposed use traffic count, was employed.**

Conversely, if the proposed Project consists primarily of “multi-family” dwellings, than that should be consistently described throughout the EIR and fully investigated relative to its impact and compatibility within the community. It is unreasonable to apply one standard where it benefits the Applicant but not consistently across the board.

The obvious conclusion is that there was a **pre-determined outcome needed in which the proposed Project had to generate a ‘reduced impact’ vs. the existing use. In order to accomplish this outcome, a different methodology (resulting in a new, lower traffic estimate) was employed in the EIR analysis. North Tustin residents deserve nothing less than an objective and thoughtful traffic analysis, not one that is partial towards a pre-determined outcome. As such, the traffic conclusions presented in this EIR cannot be reasonably approved under any circumstances without further investigation and objective study.**

Secondly, the EIR’s wildfire analysis was anemic in assessing actual fire danger for this community, again fostering the concern that a “no impact” outcome was pre-determined in this effort. The report’s “no impact” justification hangs on the fact that the site sits within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone – a seemingly safe distance. Perhaps on paper, but not when Santa Ana winds blow fire embers for miles down our dry canyons.

The report also ignores the physical design limitations of this neighborhood and the impact that would have with the addition of high-density housing. Red Hill Ridge was designed in the 1960’s for very-low density housing. It is fashioned in a cul-se-sac type layout with only one way in and out (Simon Ranch Road). It was never intended to accommodate high-density residential and certainly not one located at the furthest most point from the neighborhood’s single access point. The streets are very narrow and twisting with many blind curves. There are no sidewalks and only minimal, if any, street lighting. Fire trucks cannot turn around at the ends of these cul-de-sacs (must back out), making evacuation more challenging for existing residents. Red Hill Ridge will **never** have secondary access, which should render this location completely inappropriate for high-density housing. High density housing, as proposed, is more suitably located in areas with superior access

with multiple ingress/egress points. It is not suitable for a remote hillside flag lot situated at the furthest most point of an existing neighborhood having a single access point.

Each year, our community receives multiple fire evacuation notices for fires occurring within the vicinity. Again, due to the high Santa Ana winds, we are subject to fire risk from fires that originate near the 91 Freeway and migrate down the canyons to our backyards. Fire embers can travel a great distance, and to think that $\frac{3}{4}$ mile is safe enough to justify the tripling of density in this access-challenged neighborhood is highly irresponsible. Again, **North Tustin residents deserve an objective and vastly more thorough investigation of real fire life/safety issues and full consideration of the physical limitations of the original design of this community.**

Thirdly, it's unconscionable that the County would allow the destruction of the community's ONLY recreationally zoned parcel to allow an ill-planned housing project that does nothing to meet affordable housing needs, provides no proven community benefit, and only serves the monetary interests of a land developer and his investor. The County's parkland guideline of 2.5 acres/1,000 residents seemingly only matters if it doesn't impede an outside developer's whims. Ironically, this developer must pay an "in-lieu" parkland fee while destroying actual parkland. Explain that logic.

The County's argument that the existing use does not benefit the community being a private club does not hold up (and reveals an ignorance of the history and use of this facility). This site has served the greater community for over 60 years and continues to thrive as a recreational amenity to all of North Tustin and beyond. **Over 80% of tennis clinic participants are non-members.** Additionally, many non-members participate in swimming lessons, and local schools use the facility for tennis practice and fundraising events.

Regardless of those facts, this **site's recreation / open space zoning IS an asset to the community**, and it is the **LAST REMAINING zoned parcel of its kind in our community.** It's highly objectionable that the County would willfully allow its destruction for, simply put - the wrong project in the wrong location.

Lastly, for supporters of landowners' rights such as myself, those using that argument to support this Project are woefully uninformed of the Restrictive Land-use Covenant recorded on this site that runs in perpetuity. This legal right runs to the SOLE BENEFIT of residents of Red Hill Ridge (not the County nor the club landowner). Legally, the USE of this site BELONGS TO THESE RESIDENTS – NOT THE LANDOWNER. The landowner/developer bought the site with this knowledge and paid a price commensurate with this land-use restriction. The fact that he is taking a gamble on a legislative "loophole" does not change the fact that the USE of this site is restricted, and the rights of these beneficiaries should be upheld. It is incomprehensible that the County would disregard a recorded legal agreement, ignoring the rights of their constituents and potentially placing themselves in the middle of an unfortunate (and completely unnecessary) legal battle.

Like the overwhelming majority of North Tustin residents, I implore you to deny this development request and responsibly stand for the safety, rights and well-being of the existing residents and your constituents.

Sincerely,
Lori Chew

June 29, 2022

Mr. Kevin Canning
Contract Planner
OC Public Works
Development Services/Planning
Kevin.Canning@ocpw.ocgov.com

RE: Ranch Hills Planned Development Draft EIR

Dear Mr. Canning,

I'm a resident in the neighborhood of the Ranch Hills Planned Development ("Development"). I'm gravely concerned regarding the proposed Development and its significant impact to numerous issues, including but not limited to traffic-related safety and fire evacuation.

The Development proposes the use of the existing single access/egress driveway which is narrow and laden with view obstructions due to width, position and topography of the driveway. There are blind-spots in every direction at the access/egress location for both drivers and pedestrians. The approval of this project as proposed would be exasperate the safety conditions in the area.

Furthermore, the EIR traffic study is not a reasonable estimation of true long-term conditions. Data collected during the pandemic is not a representation of the expected long-term ambient conditions. Vehicle counts for the future Development should be evaluated for various hours of the day, including commuter hours when traffic loading is expected to be at peak and compared to the same blocks of time for counts related to the current use of the Racquet Club. This type of rigorous analysis will show a significant increase in traffic at various choke-points in key intersections such as the one at Simon Ranch and Browning.

The issue of traffic also applies to wildfire evacuation concerns. As a long-time resident of this area, we have experienced occasions when the risk of fires revealed real and significant evacuation threats to the approximately 100 homes with the single escape intersection at Simon Ranch and Browning. The proposed Development of 37 new residences potentially increases the wildfire evacuation risks by almost 40%. This is not comparable to the evacuation risk posed by users of the Racquet Club, since at any one time the Racket Club may not be widely frequented, and those that may be at the Racquet Club may already be residents in the neighborhood.

It is difficult to understand why these project plans were advanced without appropriate access/egress configurations in addition to employing a secondary outlet on Racquet

Hill. Appropriate investment and greater rigor in the planning, together with fair considerations for true mitigation of impacts to the community could have resulted in a project that would have met the objectives of the EIR and garnered broad community support. However, clearly EIR Objective #3 has not been met, although the data and conclusions of the EIR appear to have been shaped otherwise.

We are hopeful that this project is reconsidered in ways that it accommodates the concerns of the neighbors and residents.

Regards,

Max Reyhani, PE
2231 Liane Lane
Santa Ana, CA 92705
mreyhani@terrapg.com

Canning, Kevin

From: Meg Hennessey <meghennessey@gmail.com>
Sent: Wednesday, June 29, 2022 5:01 PM
To: Canning, Kevin
Cc: kirkwatilo@gmail.com
Subject: Oppostio Comments Draft EIR for PA180034 / VTTM 18119 – Ranch Hills Planned Development
Attachments: Illustrations 2 By Ruthie and Billy Garfield - Playing at the Tustin Hills Racquet Club.pdf; Illustrations By Ruthie and Billy Garfield - Playing at the Tustin Hills Racquet Club.pdf

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Mr. Canning - My family - in particular my kids - are strongly opposed to the development. We walk to the club (or scooter) and play 3-4 days a week.

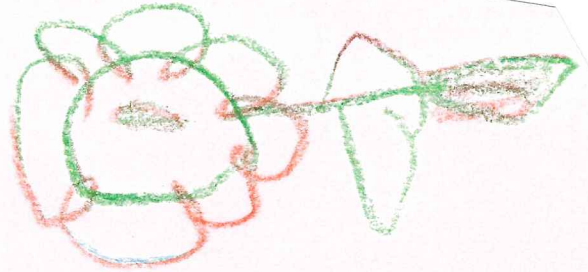
We utilize the tennis camps and clinics and have fallen in love with this community.

The building of condos would severely diminish our quality of life, and that of my kids - as well as their safety with all the of the traffic and people. The very reason we moved to this particular community in Orange County will be taken from us.

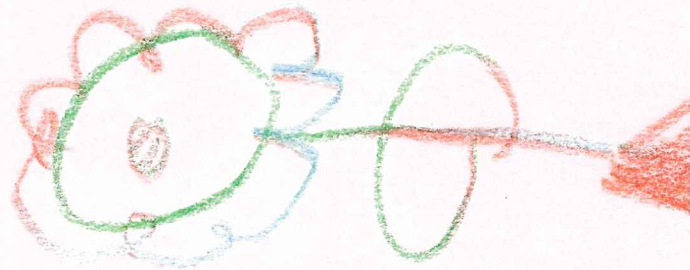
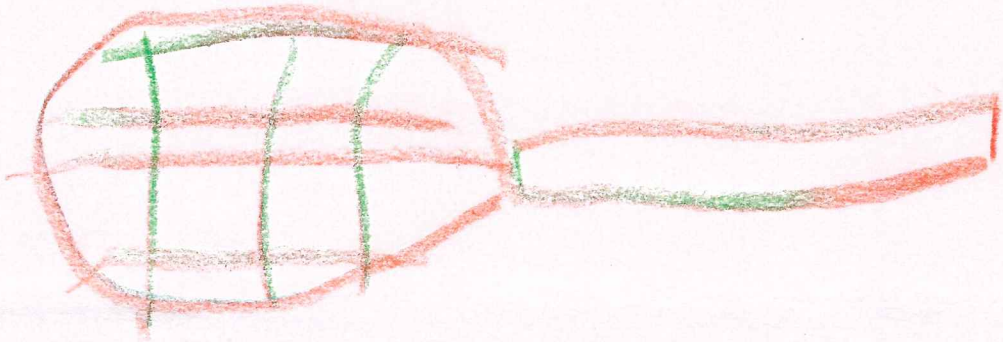
My kids would be heartbroken. They ask every day on our walks if the man is going to close down our tennis club. They've drawn the attached photo to express their sentiments.

Thank you very much for your consideration,

Meg Hennessey
Beverly Glen Drive



RUTHIE
BILLY



Canning, Kevin

From: Michael Evans <helloboing@gmail.com>
Sent: Wednesday, June 29, 2022 4:57 PM
To: Canning, Kevin
Subject: PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Kevin,

I am a neighbor writing about concerns with the proposed Ranch Hills development that would replace the current racquet club that has been there for many years.

I attended a meeting several years ago with Mr. Zender where he discussed proposals for the racquet club property. Mr. Zender has not lived up to his promises to the community at that meeting.

1. We were promised there would be additional focus groups to help develop a project that the neighborhood would appreciate. I signed up and have received no information about such focus groups.
2. We were told that the project would require rezoning to support any housing. The presentation described potential uses for the property with its current agricultural zoning. I'd be fine if Mr. Zender had proposed any projects consistent with that zoning. Now, instead of trying to get the property rezoned, they're citing some legal loophole that will allow them to cram a high-density development in a neighborhood where there is nothing consistent with that land use. I, and many others, live in the North Tustin area due to its zoning. We expect that projects will be consistent with that zoning. This project is not consistent with any nearby zoning and shows a lack of concern for the community. We expect government to uphold the zoning that is in place and not cave in to a developer who is trying to make a bunch of money at the expense of our community.
3. I'm concerned about increased traffic from this project. There are inconsistent traffic studies for this proposed development. I live near the intersection of La Colina and Ranchwood. I take frequent walks. I have been nearly run over in the crosswalk while crossing La Colina several times. The drivers don't pay attention. The Highway Patrol doesn't care. I'm not kidding. I've been almost 3/4 of the way through the crosswalk and cars just run through the top sign and have almost hit me..and I was in the crosswalk long before the car approached the intersection. Now we're going to add more traffic on La Colina through this proposed development. Also, I would imagine most of the racquet club visitors approach up Browning...either from La Colina or Irvine Blvd. If we have residents, they are likely going to learn the ways through many of our windy roads in North Tustin and will increase traffic there. Several residents already have "Slow Down" signs posted. I can imagine people cutting through Redberry/Eveningside/Ranchwood to get out to Tustin Ranch Road in an effort to avoid the traffic backup that occurs on La Colina/Browning. That will further decrease safety on the residential streets. We already have a commuter school...Tustin Memorial Academy...that generates a lot of traffic. The schools serving these new homes will also increase traffic on the winding roads in the hills...racquet club people aren't going to the schools. How many school trips a day will that be? All those trips are going to be on Skyline, SE Skyline, and Foothill.
4. Mr. Zender implied that the existing walking paths, such as the path through the property to Racquet Hill, would be maintained in his proposed development. Instead the walking path I blocked off on one end and a gate is put up on the other. This reduces the recreational aspects of the current property. Even though it's private property, it's still somewhat semi-public in its current use. We're going to lose that forever if this project is built. Many people in North Tustin take walks...sometimes very long walks through the community. Eliminating that existing walking path will send people walking down the much more hazardous Skyline Dr. Even though the racquet club is a paid facility, it still provides

additional recreational opportunities to the community. I have attended several events at the facility over the years. We may also face additional traffic due to community members who use the club having to go elsewhere for some of their outdoor recreation. We also have very few parks in the community and the developer is doing nothing to contribute to any kind of park needed space.

This project makes absolutely no positive contribution to the community.

Thanks for listening,

Michael Evans
2112 Shelterwood Rd.
Santa Ana, CA 92705

Canning, Kevin

From: Pat Johnson <pat.johnson714@gmail.com>
Sent: Wednesday, June 29, 2022 3:55 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Ranch Hills Planned Development

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. I oppose the proposed zoning changes at the Tustin Hills Racquet Club (“THRC”) property which have been in place since 1958 when THRC was built.

In reading the required reports for the requested zoning changes, I could not find expected benefits to Orange County in the form of revenue or the expected effect on the surrounding properties from a financial perspective. **I did not see a compelling plan** as to the effect of putting 37 units (plus associated parking and roads) on 5.88 acres. For instance, what is the expected revenue (home value) to the County of Orange in property taxes and how does this revenue offset with the road, sewer and electrical repairs this project will have over the construction life of the project?

The report did not seem to address the expected inconveniences to surrounding homeowners in the length of time of the project or extent of disruption during construction. There was discussion in the report about lot lines, hours of activity, traffic patterns, parking etc. What was **not in the report** is the candid discussion of estimated people on site during construction, where workers will park their vehicles, what the noise levels will be during construction times, what will noise levels be after construction for 37 units on 5.88 acres and how do these compare to the existing property noise levels.

I am not trying to “save the racquet club” but I am against rezoning property because of the sale of an existing zoned property without **complete transparency** of how this rezoning/development will benefit the community financially in the long term as well as outweigh the expected inconveniences.

*Pat Johnson
1545 Wyndham Court Rd.
Santa Ana, CA 92705*

Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
601 N. Ross St.
Santa Ana, CA 92701

Dear Mr. Canning,

We are writing to express our strong opposition to the proposed zoning change and development of the Tustin Hills Racquet Club property as outlined in the Ranch Hills Planned Development. We have been residents of the unique community of North Tustin for 45 years. This community is a very special oasis within Orange County and is valued by residents for its semi-rural character and low-density residential zoning. Approving a much higher density development in the heart of our foothill community is universally opposed by local residents. Approving this zoning change and development against the wishes of North Tustin's homeowners and residents would constitute a major overreach by the Planning Commission and will be vigorously opposed by all available legal means.

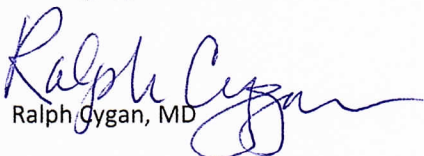
Although North Tustin has many desirable features one thing the area lacks is adequate park and recreational space. The total acreage dedicated recreational use in North Tustin is already well below County zoning guidelines. Rezoning of the Racquet Club property would remove one of our largest recreational land parcels, further eroding the limited recreational space available to residents.

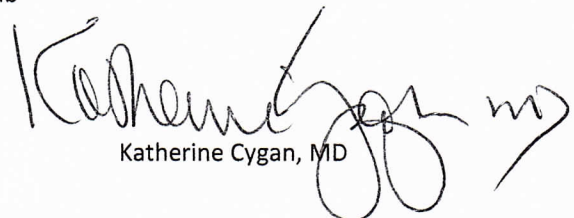
In addition, replacement of the tennis and pickleball facilities of Tustin Hills Racquet Club by high density homes would constitute not only a huge loss for our community but also for the surrounding cities. The Racquet Club's facilities, including the pool, are open to the general public who are able to participate in the Club's very active youth, high school, and adult programs. The pool and the swimming lessons program provide families who would otherwise not have access to a pool to learn swimming in a safe environment. The overwhelming majority of participants in the club's lessons and programs are not, in fact, club members whose monthly dues help subsidize the club's operation for so many others to enjoy.

The have Loss of the club would rob current and future generations of this beautiful and well-maintained tennis, pickleball , and swimming facilities as well as the expertise of the highly professional teaching and coaching staff. In part driven by the pandemic, use of the Racquet Club has never been greater as an increasing number of locals have rediscovered the joys and health benefits of outdoor tennis and pickleball. There is no other local facility that has the capacity to duplicate these activities or absorb the number of locals who would be deprived of this unique and treasured community resource.

We respectfully request that this short-sighted and ill-conceived project be denied. The profit motive of a handful of outside developers should not be allowed to change our zoning, take away our recreational space, and rob us of one of our greatest community resources – Tustin Hills Racquet Club

Thank you,


Ralph Cygan, MD


Katherine Cygan, MD

1401 Lansdowne Lane
Santa Ana, CA 92705

Canning, Kevin

From: shawn beck <shawnb690@gmail.com>
Sent: Wednesday, June 29, 2022 5:57 PM
To: Canning, Kevin
Subject: Tennis club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Kevin Canning
Contract Planner
County of Orange Public Works
Development Services/Planning
601 N. Ross St.
Santa Ana, CA 92701

Dear Mr. Canning,

We are writing to express our strong opposition to the proposed zoning change and development of the Tustin Hills Racquet Club property as outlined in the Ranch Hills Planned Development.

We have been residents of the unique community of North Tustin for 6 years. This community is a very special oasis within Orange County and is valued by residents for its semi-rural character and low-density residential zoning. Approving a much higher density development in the heart of our foothill community is universally opposed by local residents. Approving this zoning change and development against the wishes of North Tustin's homeowners and residents would constitute a major overreach by the Planning Commission and will be vigorously opposed by all available legal means.

Although North Tustin has many desirable features one thing the area lacks is adequate park and recreational space. The total acreage dedicated recreational use in North Tustin is already well below County zoning guidelines. Rezoning of the Racquet Club property would remove one of our largest recreational land parcels, further eroding the limited recreational space available to residents.

In addition, replacement of the tennis and pickleball facilities of Tustin Hills Racquet Club by high density homes would constitute not only a huge loss for our community but also for the surrounding cities. The Racquet Club's facilities, including the pool, are open

to the general public who are able to participate in the Club's very active youth, high school, and adult programs. The pool and the swimming lessons program provide families who would otherwise not have access to a pool to learn swimming in a safe environment. The overwhelming majority of participants in the club's lessons and programs are not, in fact, club members whose monthly dues help subsidize the club's operation for so many others to enjoy.

The have Loss of the club would rob current and future generations of this beautiful and well-maintained tennis, pickleball, and swimming facilities as well as the expertise of the highly professional teaching and coaching staff. In part driven by the pandemic, use of the Racquet Club has never been greater as an increasing number of locals have rediscovered the joys and health benefits of outdoor tennis and pickleball. There is no other local facility that has the capacity to duplicate these activities or absorb the number of locals who would be deprived of this unique and treasured community resource.

We respectfully request that this short-sighted and ill-conceived project be denied. The profit motive of a handful of outside developers should not be allowed to change our zoning, take away our recreational space, and rob us of one of our greatest community resources – Tustin Hills Racquet Club

Thank you,

Shawn beck M.D

Resident on salt air drive

Canning, Kevin

From: Troy Williams <socalprop@gmail.com>
Sent: Wednesday, June 29, 2022 4:38 PM
To: Canning, Kevin
Cc: KirkWatilo@gmail.com
Subject: Draft Environmental Impact Report for Re-development of Tustin Hills Racquet Club

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr. Canning,

I am responding to the Draft EIR for the PA180034 / VTTM 18119 – RANCH HILLS PLANNED DEVELOPMENT. Please be advised I am opposed to **ANY** zoning changes at the Tustin Hills Racquet Club (“THRC”) property. The current zoning has been in place since the THRC was built in 1958 and changing the zoning would be an injustice to the North Tustin community. In fact, the property is financially viable as a Tennis Club and supported its former owner's family for several decades as his only means of income.

My children, my wife, and I have lived near the Racquet Club for close to two decades with our home across from the access walkway to THRC. We purchased our home on Racquet Hill because of the large lot size and proximity to the THRC so that our family can enjoy the amenities that it provides. Our family is a member of the THRC and enjoys all the benefits that it offers both to its members and the local community. In fact, THRC has been extremely busy lately with most patrons coming from the North Tustin Area. Losing the THRC would eliminate an integral open air community recreation area, which is sparse in the North Tustin community of which the Draft EIR fails to consider. The THRC is the only open space recreational facility in the area that provides for a myriad of recreational uses which increases the overall physical and mental wellbeing of the community. The proposed development will eliminate this important recreational center, which includes uses such as tennis, pickleball, swimming, lawn activities, exercise gym and banquet facilities for events. Although the club is private, it is still accessible with different types of tennis memberships, summer pool memberships, kids’ camps, swimming lessons and social events which do not require membership. Moreover, membership at the club is open to any member of the public who would like to join and with the addition of PickleBall it has been extremely busy lately which is nice. Re-zoning the THRC parcel would add additional burden to the sparse remaining open air recreational locations in the Tustin community (none of which come close to what the THRC offers), which will detrimentally impact our community!!

The developer, Ranch Hills Partners, & principals are not citizens of North Tustin and do not have a vested interest in our community except to make a profit. In fact, a friend of mine who knows and spoke with the main principal directly told him that it was only a real estate deal to him. That is sad that a man with his wealth and power can destroy a vital asset to a community just for profit especially when he is already making a profit running it as a tennis club. In addition, the developer’s project of high-density housing of 37 condominium units on small 5,000 sq. ft. lots is inconsistent with the contiguous surrounding residential houses, which consist of half acre lots (minimum).

Additionally, the development will impact emergency management including Orange County Sheriff and Orange County Fire. It will eliminate an area that can be utilized by first responders as a staging area and/or relief center in time of emergency. It will also increase congestion when evacuation of the area is necessary, such as was required during the wildfires a few years ago that reached Peter’s Canyon. The entry point to the THRC is narrow with no sidewalks and the proposed development does not provide a secondary access. Community members, particularly in the Simon Ranch Road area, would potentially be trapped should a fire threaten that area as the pedestrian access currently in place from THRC to Racquet Hill would be closed based upon the development plans.

I strongly disagree that the impact of the development to wildlife would be “less than significant” as stated in the Draft EIR. Although the THRC property is currently “developed,” it was built over 60 years ago and has remained substantially the same ever since. THRC provides a habitat for wildlife, including coyotes, hawks, owls, bats and even wild parrots which nest in its trees and use the THRC as hunting grounds and as a wildlife corridor. As someone who plays tennis at the club, I have personally witnessed all of the aforementioned wildlife there which is not being taken into account. Just as THRC and its adjacent walking path is used by people, it is also used by wildlife to access the surrounding areas. This access and habitats will be eliminated by the new development resulting in a *significant* impact on local wildlife.

I strongly oppose the proposed development to the THRC. Re-zoning and removal of the THRC into high-density housing would change the face of North Tustin. North Tustin and the surrounding community have relied on the current zoning when purchasing their homes here and the current proposed changes are inconsistent with the Orange County General Plan. Rezoning and redevelopment of the THRC will increase commuter traffic perpetuating safety issues. The high-density plan would clog life-saving evacuation routes and strain local emergency services. Rezoning and redevelopment of the THRC will destroy a valuable community asset that provides open space recreation and requiring community members to drive outside of North Tustin for the services currently provided by the THRC. Rezoning and redevelopment of the THRC will push out the wildlife in this area. The THRC is an important community asset that has been in use for over 60 years and cannot be replaced once it is lost.

In summary, it is my opinion that this Newport Beach family is trying to further profit through redevelopment of a community asset which is already financially successful as a tennis club without rezoning. This can be a "win-win" for the owners as well as the local community with the land remaining a Tennis Club!

Please oppose this development.

Sincerely,

Troy L. Williams

Canning, Kevin

From: spyderham@aol.com
Sent: Wednesday, June 29, 2022 4:27 PM
To: Canning, Kevin; kirkwatilo@gmail.com
Subject: PA180034 / VTTM 18119 – OPPOSE RANCH HILLS PLANNED DEVELOPMENT

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Dear Mr Canning,

Because of safety concerns, I am in opposition to the Ranch Hills planned development. An increase of around 100 residents in this area could result in major problems for everyone in the case of an emergency evacuation.

Santa Ana wind dangers are a grave concern every year and this needs to be taken in consideration for all of our residents.

Please consider that this area was not designed for high density housing condominiums. Simon Ranch Road is insufficient if we need to evacuate so many residents in an emergency situation.

There are also no sidewalks and very few streetlights in this area. An increase in traffic will be dangerous when we exercise and walk our pets.

Please do not proceed with this planned development and seriously consider all of the concerns and safety of our community.

Sincerely,
Victor Lee

Canning, Kevin

From: Beth Moore <bhmoore@ymail.com>
Sent: Thursday, June 30, 2022 11:06 AM
To: Canning, Kevin
Subject: SAVE THE RACQUET CLUB - Deny Beauchamp development, please.

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

To Whom it may concern:

I am a 20-year resident of the North Tustin area, and have benefitted from the Racquet Clubs facilities many years prior to moving to this area. I am writing to voice my opposition and strong concerns related to the proposed residential build designated to replace our current Tustin Hills Racquet Club.

My Concerns are as follows:

- 1) We are already being asked by our County and our State to conserve water. How can we sustain and conserve water with a large increase in population in our community? It will only add to our drought and cause water prices to sky rocket.
- 2) The added traffic in this area would increase pollution and noise levels, in what is now a quiet, semi-rural setting. With only one road in or out of this property the added cars will make the streets more dangerous for us all to go on walks.
- 3) And, speaking of one road in or out... I'd like to know how our Public Safety, such as Fire, Ambulance & Police, can feasibly serve this area effectively. We have had many fires in the time we have resided here, and have had to evacuate numerous times. How can a large concentration of residents, and albeit elderly, exit via one road effectively and efficiently? Do we have enough Emergency personnel to handle the increase in residents in this area, given any emergency situation? And, the number of people that would have to evacuate at one time would cause a traffic jam risking everyone's safety. Even the residents of this new establishment would suffer greatly. I don't know how this is okay with existing Fire Codes; but, it is certainly not okay that you jeopardize the safety of everyone who resides in North Tustin.
- 4) The Racquet Club is not a "Member Only" Club. It serves both members and non-members, alike, by providing Tennis Clinics for adults and Tennis Camps for kids. Kids from the local High Schools come here for instruction. They have hosted, and partnered with the Assistance League of Tustin, to provide Tennis Camps for our Special Needs kids in the community. I personally witnessed their joy when our kids from the Tustin Community played Tennis with them. The club provides swim lessons to kids both near and far. Many years ago, my friend and I paid for a Summer Swim Club Membership so we could meet up and allow our toddlers to swim and play. The Racquet Club hosts many events from fundraisers, weddings, graduation and even church services, to name a few. We attended many school fundraisers there. The Racquet Club is quite literally, the Hub & nucleus of our Community.

5) As you can see, this is a vital resource not only for the residents who live here but also for those from our Tustin-Orange County Communities. The Racquet Club is already an iconic & historical landmark within our North Tustin Community, dating back to a training camp for Olympic Swimmers, some 80 years ago. The Tustin Hills Racquet Club could be an even bigger asset than it already is, given the vision.

6) Also, most of the residents here in North Tustin have their life savings based on their homes. We rely on the maintenance of property values, and know that if this project goes forward, we will all suffer from a loss in our homes' value. This is avoidable. I urge you, to please stop this "planned community" from going forward with their plans.

We want to preserve the countryside, rural setting that drew us here, in the beginning. It is why my husband and I moved here so many years back. We are still raising our kids here and hope to retire here in this community we've come to love. This is a family, kids playing in the street, riding their bikes kind of neighborhood. Please don't take that away from us by eliminating a place where our families can gather and grow.

I oppose this project coming and feel it will be bad for all involved, other than the *financial interests* of Tracy and David Beauchamp.

Thank you for your consideration.

Sincerely,

Beth Moore
Resident of North Tustin

Dear Mr. Canning – I vehemently oppose the proposed high-density condominium development known as Ranch Hills Planned Development (PA180034 / VTTM 18119) for the following reasons:

Our home is at 12321 Browning, and we do not want so many more residents and cars on our street. It is dangerous at times now and will be a magnitude greater during development and after 100's of new residents reside in the new development.

- 1. Traffic and Circulation** – traffic generated by the high-density project will create significant adverse effects as our neighborhood streets are very narrow, have no sidewalks, and minimal streetlighting. Many residents enjoy walking (and biking) in our foothill community with their pets and children, and all pedestrian activity occurs on these narrow, windy streets. Traffic from approximately 100 new residents will create a safety hazard for existing residents, and the EIR did not adequately address this grave concern.
- 2. Fire Safety** – Red Hill Ridge was designed in the 1960s/70s for very low-density homes and was never intended to accommodate high-density housing (evidenced by the narrow streets, no sidewalks, limited lighting, and single access point). Furthermore, the single ingress/egress at Simon Ranch Road is insufficient to safely accommodate the evacuation needs for an increased density project at this remote hillside location situated within $\frac{3}{4}$ mile of a Very High Fire Hazard Severity Zone. The EIR does not consider the limitations of the existing infrastructure and the serious impact on residents' safety in an emergency.
- 3. Recreation / Open Space** – the EIR fails to consider the loss of this recreational open space on the community (contending it is private property). However, club employees and members estimate that 80-90% of the Club's clinic tennis players are non-members. Local schools use the facility for tennis practice and fundraisers as well. The County also fails to consider that the site is the last remaining parcel in North Tustin zoned for Recreation/Open Space. All other parks in the area are situated on residentially zoned land. The County of Orange sets a "zoned" parkland guideline of 2.5 acres/1,000 residents. The Tustin Hills Racquet Club site (the only site zoned for parkland) represents a minuscule 0.24 acres/1,000 residents ratio. This zoning is an invaluable asset and should be preserved for the well-being of the community.
- 4. Recorded Land Use Covenant** - Residents are the beneficiaries of a binding land-use covenant that preserves the existing use and zoning. That promise should be honored without the need for court intervention.
- 5. Affordable Housing** - the project does nothing to improve affordable housing stock and, therefore, should not be entitled to any density bonuses or development regulation concessions.

We respectfully request that this ill-conceived and ill-planned project that solely benefits an outside developer/investor at the expense of the community be denied. We request the County preserve our sole recreational facility for current and future families and PROTECT residents' safety above the monetary gain of a few.

Sincerely, 

Richard Hagmann and Lili Hagmann
12321 Browning Ave. rvhagman@yahoo.com