

**From:** [Duggan, Scarlet](#)  
**To:** [REDACTED]  
**Cc:** [Foley, Katrina](#); [dave.min@mail.house.gov](#); [james.black@mail.house.gov](#); [assemblymember.dixon@assembly.ca.gov](#); [Salazar, Cindy](#)  
**Subject:** RE: Request for Coastal Commission Coordination & Environmental Review Details — PA25-0072  
**Date:** Thursday, December 11, 2025 2:28:12 PM

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Hi Elizabeth,

We have received your email below. Please note that your email will be provided to the Zoning Administrator as it relates to the 12/18/25 public hearing of PA25-0072.

Thanks,

**Scarlet Duggan, Land Use Manager**  
OC Public Works | Development Services  
601 N. Ross Street, Santa Ana, CA 92701 | (714) 667-1606



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**From:** Elizabeth Wahler [REDACTED]  
**Sent:** Monday, December 8, 2025 11:34 PM  
**To:** Duggan, Scarlet <[scarlet.duggan@ocpw.ocgov.com](mailto:scarlet.duggan@ocpw.ocgov.com)>; Salazar, Cindy <[Cindy.Salazar@ocpw.ocgov.com](mailto:Cindy.Salazar@ocpw.ocgov.com)>  
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**Subject:** Request for Coastal Commission Coordination & Environmental Review Details — PA25-0072

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

Dear Ms. Duggan and Ms. Salazar,

I am a Newport Beach resident and owner in Cameo Highlands—I am reviewing the materials for PA25-0072, and I am trying to understand how the County evaluated this project from a Coastal Act, environmental, and fire-safety standpoint. I am not an attorney, just a concerned resident, but the location of this project raises several important questions for our community.

To help me understand the process, could you please clarify the following:

## 1. Coastal Commission Coordination

Has OC Development Services consulted with the California Coastal Commission South Coast District Office regarding PA25-0072? If so, when and with whom did that coordination

occur, and what issues were discussed (fire risk, ESHA, scenic resources, the CEQA exemption, alternatives, etc.)? If no coordination has occurred, will the County be reaching out to the District Office prior to the hearing?

## **2. Coastal Act Considerations**

Because this is a Coastal Development Permit, can you please identify where the staff report or resolution addresses consistency with the relevant Coastal Act policies, including:

- Section 30240 regarding development in or adjacent to ESHA;
- Section 30251 regarding protection of scenic and visual resources;
- Section 30253 regarding public safety, wildfire hazards, and development on canyon rims;
- Canyon and landform protection; and
- Cumulative impacts of two 40-foot wireless structures in this location.

If these analyses aren't included in the current staff report or resolution, will they be added before the December 18 hearing?

## **3. Appeal Jurisdiction & Noticing**

Has the County determined whether this site lies within the Coastal Commission's appeal jurisdiction? Has the South Coast District Office been notified of this CDP application? What is the County's planned process for Coastal Commission noticing and coordination after a local decision is made?

## **4. CEQA Class 3 Exemption**

I see that the County is relying on a Class 3 CEQA exemption. To better understand this determination, could you please explain:

- How the exemption was deemed appropriate given the project's canyon-rim location in a Very High Fire Hazard Severity Zone;
- How proximity to ESHA and scenic coastal resources was evaluated;
- Whether potential effects under Section 15300.2 (unusual circumstances) were reviewed; and specifically,
- Whether the presence of significant quantities of combustible diesel fuel in a Very High Fire Hazard Severity Zone constitutes an "unusual circumstance" that would prevent use of a categorical exemption, consistent with the California Supreme Court's ruling in *Berkeley Hillside Preservation v. City of Berkeley* (2015).

## **5. OCFA Review and Defensible-Space Feasibility**

The resolution includes several OCFA-related conditions (Fire Master Plan, Precise Fuel Modification Plan, 100-foot vegetation clearance, and fuel-modification maintenance). To better understand OCFA's role, could you please clarify:

- What specific plans or materials OCFA reviewed in connection with PA25-0072;
- Whether OCFA evaluated whether the required 100-foot defensible-space / fuel-

modification zone can be accommodated entirely within the project site, or whether it would extend into private residential parcels in Cameo Highlands;

- Whether OCFA reviewed the proposed diesel generators and on-site fuel storage in light of the site's Very High Fire Hazard Severity Zone designation and canyon-rim location;
- Whether OCFA considered canyon fire behavior, wind patterns, and ember-cast risks for this site; and
- Whether OCFA's current input should be viewed as a final determination, or whether it is preliminary and contingent on future plans (e.g., Fire Master Plan, Precise Fuel Modification Plan, and final fuel-modification easements).

I am trying to understand how OCFA reached its conclusion given the site's topography, wildfire designation, adjacent to a protected watershed, and proximity to private property.

## **6. Alternative Site Analysis**

Has the County requested or reviewed alternative site locations that might reduce fire, coastal, or scenic impacts? If alternatives were provided, can you identify where they appear in the record? If no alternatives were required, could you clarify that determination?

I appreciate your time and your help in understanding how the County has approached environmental review, Coastal Act coordination, and public safety considerations for this project. Given the sensitive location next to Buck Gully and Crystal Cove these details are important for our community.

Please note, I would like these questions to be made available in the public comments for the December 18, 2025 meeting.

Thank you very much,

Elizabeth Wahler

Cameo Highlands Resident

Newport Beach, CA