Appendix A:
Notice of Preparation (NOP) and Comment Letters
A.1 - Notice of Preparation (NOP)
NOTICE OF PREPARATION AND PUBLIC SCOPING MEETING NOTICE FOR A DRAFT ENVIRONMENTAL IMPACT REPORT

TO: Interested Parties

DATE: March 3, 2017

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report and Public Scoping Meeting for The Trails at Santiago Creek Project. City of Orange Applications: Development Plan, General Plan/Zoning Amendment, and a Development Agreement

CEQA LEAD AGENCY: Staff Contact: Robert Garcia, Senior Planner, Planning Division, Community Development Department, City of Orange, 300 East Chapman Avenue, Orange, CA. 92866 Phone (714) 744-7231, FAX (714) 744-7222, rgarcia@cityoforange.org

PROJECT LOCATION:
The project is located within the City of Orange, in north-central Orange County. The site is generally located to the east of State Route 55, to the west of State Route 261, approximately two miles to the north of Chapman Avenue, on the north side of Santiago Canyon Road, between Orange Park Boulevard on the east and Cannon Street on the west, and south of Mabury Avenue. The site designated address is currently 6118 East Santiago Canyon Road (See Exhibit A: Regional Location Map, Exhibit B: Local Topographic Map, and Exhibit C: Local Aerial Map).

PROJECT COMPONENTS:
As part of community outreach, City staff and the Applicant’s representatives have worked together to establish a framework for an appropriate land use entitlement process. To formalize and ensure transparency for the entitlement process, the City and the Applicant have entered into a Pre-Development Agreement (PDA) dated October 11, 2016. This agreement sets the general parameters and provides development alternatives that are intended to guide the processing of various requested land use approvals required for the project.

Consistent with the land use entitlements being sought and PDA and for the purposes of a “worst case” analysis, in meeting the requirements of CEQA, the EIR will evaluate the development of up to 150 single family dwellings on approximately 50 acres of the109-acre site. The remaining 59 acres is proposed as natural greenway and open space. The other project plan alternatives, as described in the PDA, will also be evaluated as alternatives to the proposed project.

A Specific Plan or Development Plan will be prepared to provide a comprehensive evaluation of the land uses proposed for the site and will include land use regulations, infrastructure plans, zoning and development regulations, design guidelines and implementation criteria. The process enables the development of the property and implementation of proposed improvements, both short-term and long-term, while also addressing infrastructure improvements and community services.
The applicant requests City consideration of the following components:

- A General Plan Amendment.
- Zone Change.
- A Parcel Map for lease, sale, and/or finance of the property.
- Major Site Plan Review for the project.
- Design Review Committee consideration for review of project design.
- Park Planning and Development Committee consideration of project trails.
- A Development Agreement offering additional community benefits and vesting rights associated with project approvals for a period of time mutually agreed upon by the City and applicant.
- An EIR for disclosure and assessment of potential project impacts and establishment of mitigation measures and a Mitigation Monitoring and Reporting Program.

**SUMMARY OF PROBABLE ENVIRONMENTAL EFFECTS:**

Implementation of the proposed project may result in significant environmental effects in the following topical environmental issues:

Aesthetics, air quality, biological resources, cultural resources, geology and soils, global climate change, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, mineral resources, population and housing, public services, recreation, transportation and traffic, and utilities and service systems.

These potential environmental effects will be analyzed in the Draft EIR that will be prepared to evaluate the project’s potential impacts on the environment and project alternatives will be analyzed.

**NOP COMMENT PERIOD:**

The City of Orange is commencing with preparation of a Draft EIR for the Trails at Santiago Creek project, and has released this Notice of Preparation (NOP) in conformance with the requirements of CEQA and the City of Orange Local CEQA Guidelines.

The City wants to know your views and your specific concerns related to the potential environmental effects of the project. Information gathered during the NOP comment period will be used to shape and focus future analyses of environmental impacts in the Draft EIR.

If you are a public agency, the City is interested in the views of your agency as to the scope and content of the environmental information germane to your agency’s statutory responsibilities. As a responsible or trustee agency, your agency may need to use the Draft EIR prepared by the City when considering issuance of a permit or other approval for the project.

The City invites you to submit written comments describing your specific environmental concerns, and if representing a public agency, please identify your specific areas of statutory responsibility. Written comments are desired at the earliest possible date, but due to the time limits mandated by State law, your response must be received no later than 30 days after receipt of this notice. **The 30-day NOP public comment period begins on March 3, 2017 and ends on April 3, 2017.** Please
send your written comments to the City staff contact identified above, and please include your name, address, and contact information in your correspondence.

**PUBLIC SCOPING MEETING INFORMATION:**
The City invites you to attend a public scoping meeting to obtain additional information about the project.

A scoping meeting for public agency representatives will be held on March 16, 2017 from 2:00 p.m. to 3:00 p.m. The public agency scoping meeting will be held in Conference Room C of the Community Development Department within Orange City Hall located at 300 East Chapman Avenue in the City of Orange.

A scoping meeting for the public will be held on March 16, 2017 from 7:00 p.m. to 8:30 p.m. at Salem Lutheran Church and School Multipurpose/Gym located at 6500 E. Santiago Canyon Road in the City of Orange.

**DOCUMENT AVAILABILITY:**
The project description, location, and potential environmental effects are described below. Copies of the Initial Study, providing a preliminary analysis of the environmental effects of the project are available for public review at:

- City of Orange City Hall, Community Development Department Planning Counter & City Clerk’s Office (300 East Chapman Avenue, Orange)
- El Modena Library (300 South Hewes Street, Orange)
- Main Library (407 East Chapman Avenue, Orange)
- Taft Branch Library (740 East Taft Avenue, Orange)
- Online at the City of Orange website at: http://www.cityoforange.org/292/Project-NoticesRelated-Environmental-Doc

**PROJECT APPLICANT:** Milan REI X.
Legend

- Project Site

Exhibit B
Local Topographic Map

Source: USGS Orange (1981) 7.5' Quadrangle
A.2 - Notice of Preparation (NOP) Comment Letters
Dear Mr Garcia,

We were told that the city will present 6 plans for the *Trails at Santiago Creek* proposed development. The plans include up to 150 homes. One of the plans includes homes that would be connected to Mabury Ranch.

We oppose plans that connect homes to Mabury Ranch and also oppose any large developments. Currently the 109-acre parcel is only zoned for approximately 2 dozen homes and we hope it stays that way.

We have lived in Mabury Ranch for almost 30 years and in Orange for 45. Our 3 children were born here, grew up here and all 6 of our grandkids were born here and also grew up in Orange.

Our traffic problems are already very bad twice a day, please don't cause them to be even worse with a lot more homes in this area.

Thank you,
Donna & Brian Elliott
1962 N Isle Royale Circle
Orange, CA 92867

Sent from my iPad
Dear Mr. Garcia,

As over 40 year residents of Orange and 11 year residents of Mabury Ranch we are urging you to select the lowest density housing plan possible on Santiago Canyon east of Canon.

If you have ever experienced the traffic congestion along Santiago Canyon each week night between 4 and 7 pm. You would understand why any homes causing additional traffic would cause additional traffic problems.

Our first choice would be no homes but if that is not possible then as few homes as possible would be our reluctant 2nd choice.

We are appalled that the city has allowed the current owners to dump mountains of dirt in a once natural wildlife habitat area. But no amount of complaints have rectified this issue. Please know that we use our voices and our votes to oppose any homes but most especially a large number of residences.

A response would be appreciated.

Sincerely

Robert and Kathleen Brunner
6509 E. Joshua Tree Avenue

Sent from my iPad
PUBLIC COMMENTS TO BE INCLUDED IN PUBLIC RECORD - NOP Trails at Santiago Creek Project EIR

Please print this email and include as an official letter to be included in public record in relation to Trails at Santiago Creek, Río Santiago, Fieldstone and any other development name proposed at the Sully-Miller Property.

Joel Robinson
Mailing address:
PO Box 381
Silverado, CA 92676
Phone:
714-649-9084

My family has resided at 5907 Valley Forge Dr., Orange, CA 92869 for 30 YEARS. Our property is directly across the street (south of Santiago Canyon Rd & west of Jamestown) from the Sully-Miller property.

1) On page 1 in PROJECT BACKGROUND AND HISTORY, it reads "has been utilized for sand and gravel operations from 1919 to the present day." This statement is inaccurate. Please edit with information provided: From roughly 1996 to 2008 there were no sand and gravel operations. The community enjoyed the peaceful open space which served as a wildlife movement corridor for large mammals and birds. Some of the Sully-Miller property had been farmed with wind rows protecting row crops. Remnant coastal sage scrub habitat dotted the property. There was a field of lupines and fiddleneck. Most of the property was at surface level with Santiago Canyon Rd. In 2008, the property owner allowed significant earth movement which disfigured the landscape, removed wildlife habitat, created hills where there were none and increased noise pollution and air pollution.

2) My family moved to 5907 Valley Forge Dr., Orange, CA 92869 with the expectation that the Sully-Miller property would remain open space in perpetuity for the public benefit.

3) Our family prefers permanent open space for the entire property, but recognizes that Alternative E would be an acceptable compromise as long as the developer incorporates the design and environmental requests of the surrounding community, which include maximum accommodation for local wildlife, restoration of the Santiago Creek channel and floodplain, dedicated community farm land and equestrian facility, locally appropriate native plant landscaping, minimal/modest residential housing built with the utmost environmentally sustainable practices and rural/equestrian design aesthetic.

4) Natural open space and farm land are the preferred AESTHETICS for the property. To the dismay of the community, the owner significantly degraded the aesthetics in 2008 to pressure the community into accepting a housing development. We did not appreciate this tactic, considering my father was dying at the time and this exacerbated our severe emotional stress.

5) In the past 30 years, TRAFFIC has increased TO INTOLERABLE LEVELS on Santiago Canyon Rd, so AIR QUALITY and NOISE are currently significant negative impacts to our family. We cannot afford to have any increases in TRAFFIC and NOISE or decreases in AIR QUALITY due to a new development.
Our family has suffered from asthma, anxiety and lack of natural silence due to the impacts of Santiago Canyon Rd and the poor environmental planning and traffic engineering efforts of the City of Orange.

6) Sully-Miller's **BIOLOGICAL RESOURCES** include **COASTAL SAGE SCRUB** and **RIPARIAN HABITAT** featuring **LEAST BELL'S VIREO, COASTAL CACTUS WREN, CA GNATCATCHER, ROADRUNNER, MOUNTAIN LION, MULE DEER, BOBCAT, GRAY FOX, PACIFIC TREEFROG, WESTERN TOAD** and **CA QUAIL**. The Sully-Miller Property is a major wildlife corridor/habitat linkage between the lower and upper Santiago Creek Watershed. Any new development on the property must improve/enhance habitat conditions for the above listed species.

7) Native American **CULTURAL RESOURCES** have been observed along Santiago Creek in the east Orange area. Projectile points, bedrock mortars, middens and other prehistoric evidence have been found in the immediate area. Basalt from the El Modena Open space was used for prehistoric cobbled stones, cooking, molcajetes and other tools.

8) Due to the cumulative impacts of other housing developments and **GLOBAL CLIMATE CHANGE**, mitigation for future housing developments is almost impossible, unless the developments are designed and constructed in a environmentally sustainable manner. Any development project on Sully-Miller must adhere to the **highest standards of environmental sustainability**, including off-grid, natural/organic materials, rain harvest, maximum open space, permeable surfaces, walkable community design, public transit opportunities, etc.

9) Since the site has been used as a historic fill site since before CEQA, there may be hazards and hazardous materials that need to be investigated. Considering, there is an active landfill with emissions that are being burned directly to the west of the Sully-Miller property, any adjacent development will be impacted.

10) The **WATER QUALITY** of Santiago Creek and Handy Creek is already polluted due to runoff issues from existing housing. Any additional housing has the potential to further pollute. Current water pollution must be addressed. **RIPARIAN AND WETLAND RESTORATION** can improve water quality. Handy Creek could receive daylight across the Sully-Miller property. Santiago Creek channel could be improved and expanded to historic flood plain width and channel orientation. I would recommend the manufacture of wetlands/bioswales throughout the Sulley-Miller property to curb, treat and filter runoff, so it does not further degrade the water quality of Santiago Creek before it arrives at the OCWD recharge basins for percolation into our groundwater aquifer.

Thank you!

Sincerely,
Joel Robinson
Director/Head Naturalist
Naturalist For You
www.naturalist-for-you.org
714-649-9084
Usually available on Monday - Friday, 10AM-6PM

Mission: Connecting everyone to local wilderness!

Naturalist For You is a 501(c)(3) public benefit corporation in California, USA, & a charitable body, a SCIO registered in Scotland, with registration number SC045993.
Robert Wagner <bobw@rw-esure.com>
Thursday, March 16, 2017 11:02 AM
Robert Garcia
Trails at Santiago Creek Project
High

I strongly urge that the proposed Zoning variance be rejected. Building up to 150 single family homes on this site will have a negative impact on the entire East Orange community by further adding to the existing gridlock, often total gridlock, on Katella/Villa Park Rd/Santiago Canyon Rd, Cannon, Serrano, and Jamboree. Typically, from 6:30 to 8:30 in the morning and from 4:00 to 7:00 in the afternoon everything comes to a standstill.

Robert Wagner
Nancy Wagner
5637 E. Mountain Ave
Orange, CA 92867
714-537-7036
714-350-3244 Mobile
877-903-6496 Fax
bobw@rw-esure.com
Good Afternoon,

My husband and I are fairly new Mabury Ranch residents who have recently become aware of the planned development on the Sully-Miller property. I have two main concerns with the Trails at Santiago Creek:

First, I use the 261 toll road to get to work in Irvine every day, and the traffic on Santiago Canyon Road and Canon at night is awful. After my 25 minute drive from Irvine, it sometimes takes me another 20-25 minutes just to get down Santiago Canyon, up Canon, and onto Serrano so I can reach my home. I can't imagine how much traffic would increase with an additional 150 homes. I was wondering if the city has any plans to address the traffic issue, which is already terrible and will only get worse with additional housing.

Second, if a plan is put through to develop the property, we vehemently oppose any plans that connect the homes to Mabury Ranch. This will cause an increase in traffic in Mabury and disturb the beauty of the area just behind Mabury Ranch. The plans with the green space in between the Trails and Mabury would better preserve the natural beauty of the landscape and the abundant wildlife in and around Mabury Ranch and Santiago Oaks/Santiago Creek. I consistently see birds, cranes, ducks, squirrels, rabbits, and other wildlife in the green space just adjacent to Mabury Ave. It would be a true shame to destroy such a lovely area and impact wildlife so unnecessarily.

We bought our home in Mabury (at a premium) because of the neighborhood's quiet and natural beauty and the feeling of being "in the country". The planned development, especially one that connects to Mabury Ranch, would not only negatively impact the environment, but also property values, traffic congestion, and potentially, the safety of Mabury residents and their children who will be exposed to additional cars driving through our peaceful neighborhood.

Thank you,

Allyson Ascher
allyson.ascher@sedgwicklaw.com
949.567.7830 direct

Sedgwick LLP
2020 Main Street, Suite 1100
Irvine, CA 92614
949.852.8200 phone | 877.546.3920 fax | www.sedgwicklaw.com
Dear Mr. Garcia,

Please include the following comments in the public record for NOP Trails at Santiago Creek Project EIR.

I have lived at 5907 E. Valley Forge Drive, Orange, CA 92869 for thirty years. The back of my home is directly across the street from the current entrance to the “Sully-Miller” property now proposed for development by the Trails at Santiago Creek Project.

When my family moved to my current address, we were told that Sully Miller would be ending its operations and a park/open space would be taking its place. That statement was one of the reasons why we initially considered purchasing our property.

The operations did cease in about 1996 and we enjoyed the quiet and the wildlife of the area until the property was purchased by the current owner and degraded in an attempt to make it so undesirable that any future development would be preferred.

In addition, the existing traffic is already intolerable. As I sit here typing this at 5:30 p.m., a long line of traffic is idling outside my kitchen window. This traffic already makes the use of my backyard and the opening of windows unsuitable the majority of the time due to air and noise pollution.

Although, my family and I would prefer permanent open space for the entire property, I recognize that Alternative E would be an acceptable compromise as long as the developer incorporates design and environmental requests of the surrounding community.

I ask the following:
1) That the water quality of Santiago Creek and Handy Creek and the areas surrounding it be restored. Runoff needs to be monitored during the construction process and the watershed be returned to its natural state.

2) The lighting of the new development is directed away from the creek.

3) That the open space/park areas be replanted with native plants of this region with good community access.

4) That sustainable building materials be used for the development and that provisions are implemented to sustain yards with limited watering needs and permeable surfaces to retain water.

5) That Santiago Canyon Road be resurfaced with a material and method that better absorbs sound.

6) As I directly observed broken concrete, asphalt, and other materials being dumped to build the current “hills” on the property, that care be taken in identifying hazardous materials on the property and appropriate safe, healthy actions be taken.

Thank you for your consideration.

Sincerely,

Bonnie Robinson

5907 E. Valley Forge Drive

Orange, CA  92869

714-292-2762
Dear Mr. Garcia,

In addition to the comments sent earlier, I would like to remind the people completing the EIR that traffic, air, and noise pollution will also be impacted by the building of the significant number of homes in the Santiago Hills 2 Development. We already have difficulties and we haven't even seen the impact from that proposed development yet.

Thank you.

Bonnie Robinson
714-292-2762
Hello Robert,

The following are my comments on the initial public presentation.

1. Ideally, these should be acre lots. I could support lots as small as half acre lots if used as a negotiating tool. I wouldn’t support lots smaller than that.

2. Nicky Wy at Santiago Canyon should be the main entrance with a traffic signal.

3. There should be maintained trails accessing Nicky Wy, Cannon St, and Santiago Oaks regional park.

4. There should be some public/community park or activity center, with a children’s playground and grass area. No sporting event facilities.

5. The Mara Brand equestrian center should remain, but I would support a low density development of the dirt lot on the west side of the arena.

Alternative E would be my 1st choice, only because it has the least amount of residential acreage, which would equate to fewer homes and thus, less density. Any alternative site plan choice would be dependent on the proposed lot size of the requested rezoning.

Respectfully,

Michael Granek
(714)296-3058

Sent from my iPad
Mr. Garcia,

Although it is difficult to identify the appropriate scope for comment and/or concern for a proposed project that at this time is ill defined, the following is a general listing of areas that should be studied in an EIR particularly for "alternative A".

1. Impact on traffic along Santiago Canyon, Cannon and the intersection of those two
2. Requirement for a traffic signal on Santiago Canyon to ease ingress/egress to and from the proposed development, and, if necessary, the impact on traffic flow with an added signal
3. Affect regarding current policy of both City of Orange and Orange County Fire Authority of running without sirens along Santiago Canyon and Cannon should an additional traffic signal be installed, and the resultant noise impact
4. Additional noise pollution impact
5. Project affect on view-scape
6. Additional air pollution impact
7. Additional light pollution impact
8. Why the City would consider any form of development on the property during drought years which would further burden the existing water supplies
9. The impact of a 50-year flood on the proposed development
10. Impact on the coyote pack that dens on the existing property
11. Protections to Santiago Creek both during and post construction
12. Impact(s) on other wildlife -- nesting kites in spring of 2015 may or may not remain present
13. Impact to Linda Vista Elementary student capacity

Additionally, an economic impact should be developed to address:

1. Project impact to property values in Mabury Ranch, particularly along Mabury Avenue vis-a-vis development of existing property rights (+/-15Ac along Mabury Avenue R-1 8,000) and proposed development of each alternative.

Thanks for your attention to these matters.

Ron and Jane Rothschild
6019 E. Mabury Avenue
Robert Garcia

From: Dan Graupensperger <yonka@pacbell.net>
Sent: Friday, March 17, 2017 5:20 PM
To: Robert Garcia
Subject: Trails at Santiago Creek Scoping Meeting

Robert,

Carol and I attended the meeting last night and had an opportunity to review the different options. First, the staff person who we talked to was very helpful and did a good job of describing the differences and similarities of the options. Second, if we were to choose an option it would be option E. This option seems to be the one most in line with what the surrounding neighborhood wants. Furthermore, it creates the largest open space foot print which is in keeping with the "East End" vibe.

Our 2 cents
Carol and Dan Graupensperger
First thank you for hanging at the meeting. As you certainly know now there are many very serious residence wanting the best for the current community. Fortunately in the end something will be planned that will accommodate the desires and needs of most of the residence.

Looking at the various preliminary suggestion I find that all of them are almost OK but definitely have room for some changes that could make the overall plan better for everyone and also for future residence of this area. How, where and when can my ideas be presented?

Gary Wright

ussalesgw@cs.com
Robert Garcia

From: David Bailey <baileydn@yahoo.com>
Sent: Saturday, March 18, 2017 4:09 PM
To: Robert Garcia
Subject: Sully-Miller Project Scoping Meeting Environmental Concerns

Robert,

I spoke to you following the Sully-Miller Project Scoping Meeting on March 16 at Salem Lutheran Church/School. It sounded like the overwhelming majority of the attendees are very frustrated with this project. I will remind you of our conversation which revolved around the traffic concerns and the fact that traffic is terrible on Santiago Canyon Rd which means that surrounding roads get severely backed up as well.

I live in Mabury Ranch and moved in roughly 13 years ago at that time Serrano was just getting opened to allow traffic to pass through to Anaheim Hills and the housing market was booming. Weir Canyon in Anaheim Hills was on the planning map to connect to Jamboree Rd. That was pulled at some time following the housing bust in 2008. Jamboree and Weir Canyon are much larger roads with fewer access points and designed to handle faster speeds but the removal of this connection has resulted an extreme number of vehicles using Santiago to Cannon to Serrano to get to Anaheim Hills. I have sat in bumper to bumper traffic on Santiago too many evenings starting at the cemetery all the way to Serrano. I believe that is less than 5 miles and it can take me 30 minutes. I could park my car in the middle of Santiago and run home faster. That is a complete failure of traffic planning.

I personally feel if you tackle the traffic issues first and resolve the gridlock of Santiago and Cannon, then and only then will you have any chance adding additional homes and vehicles in that area. That will at least let you move on to the other planning/environmental issues. The property is Zoned “as is” and the developer bought it "as is". I realize change comes but not sure the city will ever get the approval from the residents in the area to change that zoning.

Environmental Concerns in order as I see them – Top three say most of it.
1. Traffic
2. Traffic
3. And Traffic
4. Schools – REAL capacity (not Orange Unified taking cash and not really having facilities to handle the number of potential students from 150 single family homes)
5. Fire department – capabilities
6. Police Services – capabilities
7. Hospital Services – capabilities
8. Flood Zoning for the exposure – Damns up stream are old and have not been maintained like most governmental projects. Do not allow developer to redirect the stream/river or create a concrete overflow. If property is lost from flooding expect the city planners and developer to be dragged into court for gross negligence in developing the property.
9. Don’t change the topography of the property – I have a feeling the developer has intentions of taking the growing mountain of dirt and rock and relocating it to the North side of the stream/river so they can develop the maximum number of R1 8000 homes when the actuality of the property is it can hold at best 20 homes instead of 50.
Thank you,

David Bailey
6642 E. Yosemite Ave
Orange CA 92867
714-457-2927
david.bailey@sbcglobal.net
Dear Rick,

I was at the meeting regarding the developing of the Sully Miller Property. I found I came away more frustrated and a lot of unanswered questions regarding the development.

The following are my concerns:

I have lived here in Mabury Ranch for 10 years and moved to the East Orange area for the reason of open space and to get out of the rat race of traffic congestion. Over the course of the last 10 years the traffic issues along Santiago and Cannon has become a nightmare and almost "gridlock" at peak hours. With this potential development of several hundred more cars added to this issue is not a good plan for our community and absolutely the worst scenario!!!

In addition, the proposed development along Mabury on the north side of the creek would be an absolute detriment to our Mabury Community with the noise, lights, traffic, crime issues ect.... Not a good plan at all for which I am totally against. I live on the comer along Yellowstone which would mean I would have even more cars driving past my house which now is annoying as people cut through our neighborhood going very fast and unsafe.

Lastly, I have huge concern for the wildlife in the creek area and the environmental impact this development will cause upon the fragile area for the habitat. Its so beautiful with all the birds and animals. This would drastically change the landscape and it would forever change this unique piece of land.

I BEG of you to make the RIGHT choice and take into consideration what the City of Orange REALLY needs, NOT more homes and development but MORE open space and natural area. We need trails and more hiking areas. Please go to bat for out community and hear what the community input is to this serious situation.

Thank you for your time and attention.

LETS MAKE ORANGE A BETTER CITY and SET APART FROM OTHER CITIES WHERE ITS A CONCRETE JUNGLE!!

Sincerely,

Kelly Herbeck
6121 E. Shenandoah
Mr. Robert Garcia,

Thank you for having a scoping meeting on March 16, 2017 regarding the Trails at Santiago Creek Development Project. In the meeting, you requested we send you our environmental concerns via email. Below are just a few preliminary concerns I have with the proposed project:

1. Traffic: As you are well aware, the current traffic on Santiago Canyon/Cannon is reaching epic proportions. A few miles can take up to 30 minutes to complete. In our formerly serene neighborhood, the current situation is unbearable. Adding additional homes would only exacerbate the issue. Per the OC Register (5/7/2014) the intersection at Jamboree and Chapman is THE most dangerous and deadly intersection in Orange County. I would hate to think the Orange City Planners are accepting and/or comfortable that their decision on this development may be a fatal one. As I mentioned in the meeting on March 16, another traffic light is not a solution. We need a solution that takes motorist out of this path and onto an alternative route, out of our neighborhoods.

2. Traffic Alternatives: In doing additional research, it appears that Jamboree Road was initially slated to continue through to Weir Canyon. Per Ed Knight, former Community Development Director, this extension was in the OC Master Plan of Arterial Highways and in the City of Orange General Plan (OC Register 8/21/2013). On November 5, 2005, the City approved the East-Orange Planned Community (I believe Santiago II) they also approved to STOP this extension citing they no longer felt this was needed. However, the Santiago II development of approx. 1180 homes is slated to be adjacent to Peters Canyon on Jamboree, and south of Irvine Lake between Jamboree and the Transportation Corridor. This site is to be developed in 2019, again causing additional congestion and health and safety concerns.

2a. Traffic Alternatives: Perhaps Sully-Miller and/or City can also approach the owners of the transportation corridor and propose adding an additional exit (or two) off the Toll Road. Currently Santiago is the last exit prior to the 91 Freeway. Again, the current lack of alternatives is causing additional traffic and congestion.

2b. Traffic Alternatives: Please note, if one of the solutions is to extend Orange Park, Yellowstone, Lassen or Mt McKinley through Mabury Ranch; I will be an activist to gate Mabury Ranch and create a private road. Again, this is not a solution.

3. Existing poor City Planning: I cannot find any data stating that a Jamboree extension was considered when Serrano Heights was developed. This area was developed over several years in the early 90’s and added 1180 homes. The development of Serrano Heights is a major cause of traffic on Santiago, Cannon, and Serrano. Traffic issues and concerns were addressed with the City back in 2005, yet seem to have fallen on deaf ears. The Mabury Ranch HOA sued the City over these issues. All of the predictions have come true. The traffic is a nightmare and numerous accidents occur on Serrano and Cannon on a monthly basis.
4. Flooding: The land in question is in a FEMA designated Flood Plain. At the meeting you seemed surprised by this information, and told us to “write it down”. However, I was able to find this information within minutes by going onto the OCFlood.com website, a city website, www.ocflood.com. This redirected me to a FEMA site and I have attached a copy of the map for your edification. On Feb. 26, 1969, this area flooded and two homes were swept away. Again, I cannot imagine the City Planners would be comfortable if homes and potentially lives were lost due to their poor due diligence on this development.

5. Flora/Fauna: I have not even addressed the numerous plants, animals, and wildlife that live in this area. By disturbing ecological balance of coyotes, rabbits, birds, fish, mountain lions, etc…we potentially have our livestock threatened, our family pets and small children threatened, our home landscaping threatened by these animals. When we develop, we drive them out of their natural habitat. This needs to be reviewed.

6. The existing Methane Field: This acreage is the Villa Park Refuse and Disposal Station Number 22, located on the northeast corner of Santiago Canyon and Cannon. The city of Fullerton settled a legal battle for 2.5 million dollars when residences were built NEAR the McColl landfill. The settlements by builders were also in the millions. We need to learn from our neighbors. As a community, we cannot afford litigation on a development we did not want in the first place.

That leads me to my final concern. Why does this land have to be developed? You asked the room to write down their “environmental” concerns and deliver to you. Let’s go back further, and not develop the land at all. Why does the city continue to get into relationships with developers? Stop! We do not want this land developed. We have serious concerns with the current situation let alone the additional impact of houses, cars, and people on our neighborhoods. Let’s preserve this natural open space for all residents to enjoy and NOT develop.

Sincerely,

Barbie Stevenson
Mabury Ranch Homeowner
Dear Mr. Garcia, I understand that additional development is being considered along Santiago Ave, close to Cannon. Are you even remotely aware of the traffic congestion that occurs in this area? What use to take me 20 minutes to get home from work routinely takes an hour now. It is absolute grid lock in the mornings and afternoon, I am beyond the breaking point based on what has happened to our area in the past several years. I can't let my children ride their bikes to school anymore, it has become increasingly dangerous to school children, especially at Linda Vista. You should be looking at ways to relieve the congestion, not create more. Most of this traffic is people traveling from the Inland Empire to jobs in Irvine. We residents of East Orange are the causality of poor planning and not extending Jamboree, please do not allow it to get any worse and more dangerous. Based on the current situation, any changes that may create additional congestion will generate great activism from the community, myself included, who has never taken a strong position on development in the area before.

Sincerely,
Peter Piferi
6026 E. Teton Ave,
Orange
Mr. Robert Garcia,

My name is Brandon Herbeck, and I am a current resident of Mabury Ranch. Over the last couple of years, there have been talks of developing the property near Santiago/Cannon streets, which deeply concerns me. I worked in Irvine, and the commute to and from my job was long and stressful. At times, the traffic around the Santiago/Cannon area was so backed up that it would take me over an hour just to reach my home. With potential new homes being developed in this area, the traffic would only worsen at peak hours (both in the morning and at night), leading to potentially escalated and unsafe situations.

In addition to the traffic concerns with this development project, I am only concerned about the environmental impact this project will have for the surrounding wildlife. What makes this area great and attractive is the number of trails and open space for city residents to explore (especially during the spring time). With the development of new homes, the beautiful, open landscape would surely be greatly impacted.

Thank you for your time and attention, and listening to the concerns of a local resident.

Regards,
Brandon Herbeck
Robert Garcia

From: Ann and Bob Forbes <abforbes@att.net>
Sent: Tuesday, March 21, 2017 11:32 AM
To: Robert Garcia
Subject: Sully/Miller

We are long time residents of Mabury Ranch. Yes! we know something will be built at the corner of Cannon and Santiago.
All we are asking is please
Look at the traffic problem in the area..currently.
Plan on the smaller side.
Do not open our tract to this new housing.

We do have two questions, what will it cost to widen and maintain the roadways in this area?
Who will lose their property to widen the roads...what will that cost the tax payers.
Thank You

Ann and Bob Forbes
6518 E Yosemite Ave
Orange, 92867
Dear Mr. Garcia,

I have been a resident of Mabury Ranch for 20 years. I have seen the increase in traffic and within the last 5 years it has gotten progressively worse even with the widening of lanes.

I am against any development on the Sully Miller property and the surrounding area. I have attended City Council meetings and meetings regarding the development of the land. I am also opposed to using Mabury ranch and a thoroughfare and will join my neighbors in putting a gate around our neighborhood and closing it off.

Why do we have to develop this land. We need to keep the space open.

Leisha Fauth
Mabury Ranch resident
714.231.7723
Dear Mr. Garcia:

Thanks to the City of Orange and you for holding the NOP meeting at Salem Lutheran Church last week.

I am choosing to respond to the Milan Alternative A first and foremost.

First, the current traffic situation on Santiago Canyon Road is contrary to the "rural atmosphere" that OPA wants to maintain and enjoy. On most business days, the traffic is almost gridlocked in the morning and in the afternoon. More so in the afternoon, as the stopped traffic extends from Anaheim Hills well past Peters Canyon on Jamboree Road.

What is the cause of the dense traffic? It seems that the traffic is caused by drivers from Anaheim Hills and by drivers who are evacuating the 91 freeway coming from Riverside County. The latter are choosing not to pay the tolls on the 241 and the former cannot use the 241/261 without driving through OPA. I have had discussions with the City of Anaheim, Orange County Public Works, the City of Orange and a couple of board members from the Transportation Corridor Authority on the subject of exploring the phenomenon. At this point, I have been unsuccessful in raising the matter to a point of governmental consciousness sufficient to study the dynamics of the traffic patterns. Mark Murphy, a member of the TCA Board and a current Orange councilman, told me that he expects the Santiago Canyon Road traffic to be reduced when the 241 "flyover" to the 91 is completed in a few years. I do not share Councilman's Murphy's optimism.

Secondly, the growing use of GPS navigation systems are diverting drivers through OPA who would not otherwise make the trip. Traffic counts on Orange Park Boulevard are growing during the time slots mentioned above, notably in the evening hours. Navigation systems route the driver on the fastest route regardless of the hazards of the route and the impact on the neighborhood. As you may know, the Boulevard is a destination for equestrians, horse carriages, bicyclists and walkers. This increases the danger of enjoying the OPA lifestyle, something no one wants and few of us will tolerate.

A second point on GPS has to do with the Santiago Hills II property and the proposed 22 home development on Newport Boulevard. These properties bring well over 1000 homes to the area along with an acknowledged gridlock at Chapman Avenue and Prospect Street. Contrary to the traffic analysis done by the Irvine Company, GPS will divert these drivers to the path of least resistance which in most cases will be through OPA on Santiago Canyon Road and Orange Park Boulevard.

Thirdly, without any mitigation of the current traffic situation, the most likely response to the dense traffic will be to widen Santiago Canyon Road to six (6) lanes. A widening of the road is completely unacceptable to most of the OPA community and to me. Widening the road is not addressing the root cause of the traffic density and is not acceptable as part of the development of the property or as a delayed byproduct of this development.

On this alone, I have to reject 150 homes on the Sully Miller property at this time and at any time in the foreseeable future until the traffic situation is under control. My belief is that 150 homes would add 500 or more vehicle trips to the road during congested business days. A lesser amount of homes on the property would add traffic that the road cannot sustain in a manner consistent with OP Association goals. At this point in the process, I dislike all the alternatives suggested.

Of course, along with the traffic congestion comes unwanted traffic signals, pollution and noise. These have been minimized in OPA in good part due to the continuous efforts of the Orange Park Association during the last fifty years.

Fourth, I believe that the portion of the property that lies within the OPA Specific Plan is zoned for one acre minimal parcels. The integrity of the OPA Specific Plan must be maintained. It's not clear from the NOP presentation what densities are proposed in Alternatives A,B,C and D. Any effort to increase the density within OPA will be met with resistance as have similar efforts in the past.

Fifth, zoning changes are not mandatory. They are at the discretion of the council and must be justified and supportive of the OPA lifestyle. Thomas Jefferson originally wrote the words "Life, Liberty and Property" for inclusion to the Declaration of Independence. Benjamin Franklin corrected the phrase, rightfully so, to read "Life, Liberty and the Pursuit of Happiness," implying that property ownership, while valuable, is subordinate to human goals and successes. With this in mind, I have to ask what happiness will be brought and how will my liberties be affected should this project be approved. I can see very little happiness in what I have learned so far. I see my enjoyment of a very unique and special community being reduced greatly. Milan Capital enjoys the freedom to make money from this project, although not guaranteed. What liberties do I gain? It's unclear to me. I would like Milan Capital to offer me an explanation.

Lastly, I see very little difference between alternatives B,C and D. Perhaps there are differences that are not explained on the drawings.

I am available to discuss these thoughts with you at any time.
Yours very truly,

Peter Jacklin
Chair, Orange Park Acres Traffic Committee
Former Director, Orange Park Association
Notice of Preparation of a Draft Environmental Impact Report for the Trails at Santiago Creek Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff’s comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Air Quality Analysis
The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD’s Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD’s website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when...
preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the proposed project and all air pollutant sources related to the proposed project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis”) can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board’s Air Quality and Land Use Handbook: A Community Perspective, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

**Mitigation Measures**

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the proposed project, including:

- Chapter 11 of the SCAQMD CEQA Air Quality Handbook
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD’s Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address:
Permits
In the event that the proposed project requires a permit from SCAQMD, SCAQMD should be listed as a responsible agency for the proposed project. For more information on permits, please visit the SCAQMD webpage at: http://www.aqmd.gov/home/permits. If there are permitting questions, they can be directed to Engineering and Permitting Staff at (909) 396-3385.

Data Sources
SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD’s webpage (http://www.aqmd.gov).

The SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
ORC170307-07
Control Number
Dear Mr. Garcia,

This letter is in response to your notice for a public scoping meeting regarding the EIR for the Trails at Santiago Creek Project.

The Santiago Greenway Alliance is a local non-profit organization dedicated to the restoration of Santiago Creek and implementation of a Bikeway and a system of recreation trails along its bank. Our Mission Statement as given in our Articles of Incorporation is:

1. Construct a multi-purpose trail system along Santiago Creek connecting the Santa Ana River National Recreation Trail in Santa Ana to Santiago Oaks Regional Park in Orange.
2. Create a Greenway (where possible) along the creek by restoring the creek bed and adjacent uplands with native trees and shrubs.
3. Restore the creek’s natural contribution to groundwater recharging by removal of concrete parking lots from the creek bed and replacing non-native plants with soft-stemmed natives.
4. Maintain or improve flood protection goals defined by county officials and the U.S. Army Corps of Engineers.

For more information about our organization and to view the Santiago Creek Vision Plan, please go to http://www.santiagogreenway.org/.

Our goals for the Trails at Santiago Creek project site flow logically from our Mission Statement:

1. Construction of a Class I Bike Path connecting the end of the existing Santiago Creek Bike Path west of Cannon Street to Santiago Oaks Regional Park.
2. Construction of a riding and hiking trail connecting the end of the existing Santiago Creek Bike Path west of Cannon Street to Santiago Oaks Regional Park.
3. Restore and maintain the natural habitat and hydrology of Santiago Creek consistent with flood protection requirements.
4. Restore and maintain the Santiago Creek open space including the entire area between the creek and the northern boundary of the project site. We recommend that this open space be incorporated into Santiago Oaks Regional Park.

Thank you for the opportunity to comment on the proposed project.

John T. Moore
President, Santiago Creek Greenway Alliance

Pamela Galera
Vice President, Santiago Creek Greenway Alliance
March 24, 2017

Sent by Email

In Reply Refer To:
FWS-OR-17B0150-17CPA0112

Mr. Robert Garcia
Senior Planner, Community Development Department
City of Orange
300 East Chapman Avenue
Orange, California 92866

Subject: Notice of Preparation a Draft Environmental Impact Report for The Trails at Santiago Creek Project, City of Orange, Orange County, California

Dear Mr. Garcia,

We have reviewed the above referenced Notice of Preparation (NOP), dated March 3, 2017. The project is located at 6118 East Santiago Canyon Road, in the City of Orange, California. Our primary concern and mandate is the protection of public fish and wildlife resources and their habitats. We have legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. We are also responsible for administering the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.). We offer the following comments in keeping with our agency’s mission “to work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people.”

The project site has an extended history of surface mining and material recycling operations that date from the early 1900’s to the current day. The proposed project would include a residential development of up to 150 single family dwellings on approximately 50 acres of the 109-acre site. The remaining 59 acres would be a designated as a natural greenway and open space.

The project may impact sensitive species and habitats along Santiago Creek. Riparian habitat near the project area is occupied by the federally endangered least Bell’s vireo (Vireo bellii pusillus). In addition, the federally threatened coastal California gnatcatcher (Polioptila californica californica) occurs within coastal sage scrub vegetation onsite. We recommend that impacts to these sensitive habitats and species be assessed in the Draft Environmental Impact Report (DEIR), and avoided to the greatest extent feasible.

The Act prohibits the unpermitted “take” of listed species, including the gnatcatcher [16 U.S.C. 1538(a)(1)(B)]. “Take” means to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct” [16 U.S.C. 1532(19)]. “Harm” means “an
act which actually kills or injures wildlife, including acts causing significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering.”

Exemptions to the prohibitions against take may be obtained through interagency consultation with the Service for projects with Federal involvement pursuant to section 7 of the Act or through the issuance of an incidental take permit under section 10(a)(1)(B) of the Act. If the subject project is to be funded, authorized, or carried out by a Federal agency and may affect a listed species, the Federal agency must consult with the Service, pursuant to section 7(a)(2) of the Act. If a proposed project does not involve a Federal agency but may result in the take of a listed animal species, the project proponent should apply for an incidental take permit, pursuant to section 10(a)(1)(B) of the Act. Once a project proponent determines if the proposed project will have a lead Federal agency, we can provide more detailed information regarding section 7 interagency consultation or the 10(a)(1)(B) permitting process.

We recommend that the development footprint (including fuel modification zones, access roads, and associated infrastructure) avoid impacts to native habitat and sensitive species to the greatest extent feasible. The residential development should be located adjacent to existing roadways and housing, and as far from Santiago Creek and natural habitats as possible. For example, Alternative C could be redesigned to pull the development footprint away from the creek to the north by expanding the footprint to the east near existing homes.

The DEIR should define the terms “Greenway,” “Open Space,” and “Passive Green Area.” We recommend that all avoided areas and habitats be restored with coastal sage scrub and riparian vegetation and conserved, and that any roads, trails, or other human uses be located along the edge of the restored and conserved vegetation to provide the greatest benefit for the sensitive species and habitats that would be impacted by the project.

We appreciate the opportunity to comment on the referenced Notice of Preparation and to participate in the planning process. If you have any questions regarding this letter, please contact Colleen Draguesku of this office at 760-431-9440, extension 241.

Sincerely,

JONATHAN SNYDER
for Karen A. Goebel
Assistant Field Supervisor

cc:
Jennifer Turner, California Department of Fish and Wildlife
March 29, 2017

Robert Garcia
City of Orange
Community Development Department
300 East Chapman Avenue
Orange, CA 92866

SUBJECT: Comments on the Notice of Preparation for a Draft EIR for The Trails at Santiago Creek in the City of Orange

OC Waste & Recycling has the following comments on the Notice of Preparation (NOP) for a Draft EIR for The Trails at Santiago Creek Project:

Hazards/Landfill Gas - Former Villa Park Refuse Disposal Station

- The proposed Project would be located directly east of the 17-acre former Villa Park Refuse Disposal Station. The former Villa Park Refuse Disposal Station is owned by the County of Orange and was operated by the County from 1962-1966. OC Waste & Recycling continues to maintain and monitor the site in order to ensure the public's health and safety. Environmental control and monitoring systems at the site include a landfill gas collection and flaring system, landfill gas monitoring probes, groundwater monitoring wells, and perimeter surface water collection channels. In addition, OC Waste & Recycling maintains the landfill cover to prevent ponding, erosion and differential settlement. State and local agencies that monitor the site include the California Regional Water Quality Control Board - Santa Ana Region (RWQCB), South Coast Air Quality Management District (SCAQMD) and the County of Orange Health Care Agency/Local Enforcement Agency (LEA).

- During the NOP public agency scoping meeting held on March 16, 2017, the figures provided by the City included a conceptual land use plan, which showed a proposed open space area immediately north of Santiago Canyon Road and adjacent to the former Villa Park Refuse Disposal Station. The actual size of the open space area was not available at the time of the scoping meeting. OC Waste & Recycling therefore requests that the City of Orange ensures the conceptual land use plan includes an open space area between the former Villa Park Refuse Disposal Station and any occupied structures.

- The Draft EIR should include a quantitative health risk assessment (HRA) to determine whether it is safe to site potentially sensitive occupied structures directly adjacent to a former refuse disposal station.

- OC Waste & Recycling recommends that for all occupied structures located within 1,000 feet of the former Villa Park Refuse Disposal Station, that these occupied structures be equipped with structural mitigation to prevent landfill gas accumulation underneath and
inside the occupied structures. For all occupied structures located within the 1,000 foot radius, this mitigation would include the following structural mitigation controls for each new structure: (1) a geomembrane between the slab and the subgrade, (2) a permeable layer with venting pipe between the geomembrane, and (3) automatic methane gas sensors with audible alarms in the permeable layer and inside the structures. The Draft EIR should mandate that the project applicant will commit to these structural control features and that this will be a Condition of Approval for the proposed project. In addition, the Mitigation Monitoring and Reporting Program should also mandate that design plans for any occupied structures within 1000 feet of the refuse limit, and structural systems to prevent gas-related hazards, are required to be reviewed and approved by the LEA.

**Water Quality**

- The Draft EIR should indicate how surface water runoff and irrigation water, generated in the western portion of the project site, will be controlled and conveyed in such a way so that there are no significant impacts to the landfill final cover or to the existing groundwater monitoring wells.

**Disclosure Statement – Proximity of New Homes to Former Villa Park Refuse Disposal Station**

- The conceptual land use plan for the project shows future homes located approximately 1,000 feet from the former Villa Park Refuse Disposal Station. OC Waste & Recycling recommends that a verbal disclosure of the proximity of the former Villa Park Refuse Disposal Station be made during the earliest phase of showing homes to prospective buyers. This verbal disclosure would be in addition to the written disclosure provided to the homeowner when purchasing the home. OC Waste & Recycling staff have found that despite the written disclosure statements required by law, new homebuyers often don't realize that a former refuse disposal station is nearby. By verbally informing potential buyers early in the process, the buyers are more apt to read the disclosure statement and make an informed purchase. The Draft EIR should mandate that the project applicant commit to this disclosure as a mitigation measure for the project and that this should also become a Condition of Approval for the proposed project. In addition, the Mitigation Monitoring and Reporting Program should also mandate future disclosure by the homebuilders for the project. Each property deed should also require verbal as well as written disclosure to future buyers or renters of the home's location near the former refuse disposal station.

Sincerely,

[Signature]

Jeff Arrour, Environmental Services Manager

**cc:** Jeff Southern, Deputy Director, Waste Management Operations
March 31, 2017

Robert Garcia
City of Orange Planning Division
300 East Chapman
Orange, CA 92866

Subject: Notice of Preparation and Public Scoping Meeting Notice for a DEIR for The Trails at Santiago Creek

Dear Mr. Garcia:

Thank you for the opportunity to comment on the subject project. The County of Orange offers the following comments on the long version of the Notice of Preparation:

**OC Public Works - Flood Programs on behalf of the Orange County Flood Control District (OCFCFD)**

1. The Trails at Santiago Creek project area covers approximately 109 acres of unimproved land and is proposed to be developed into 150 single family dwellings on 50 acres, and the remaining 59 acres of open space. The Santiago Creek (E08), a privately owned, natural watercourse passes along the project site in the east-west direction. The Orange County Flood Control District’s (OCFCFD) Handy Creek Storm Channel (E08S06) traverses the central portion of the project site and eventually confluences with Santiago Creek. The DEIR should clearly identify all drainage facilities and natural watercourses that will be impacted by the project.

2. For your information, the Handy Creek Storm Channel (E08S06) is a deficient flood control facility and may not be capable of conveying runoff from the 100-year storm event. For this reason, it is recommended that the runoff from the development be drained directly into Santiago Creek and not into Handy Creek Storm Channel.

3. Increases in impermeable areas caused by development when combined with improved local drainage facilities will likely increase the amount of runoff entering local and OCFCFD/Orange County drainage facilities. A discussion of such impacts supported by hydrology and hydraulics analyses, and mitigation measures, including erosion and scour in natural watercourses, should be included in the DEIR.

4. Hydrologic, hydraulic and sediment transport analyses should evaluate and compare quantitatively the runoff volumes, peak flow rate increases, adequacy of existing drainage facilities, and erosion and scour issues to ensure existing conditions are not worsened in the post-project condition. All hydrologic, hydraulic and sediment transport studies must conform to the current guidelines and criteria as specified in the
Orange County Hydrology Manual (OCHM), Addendum No. 1 to the OCHM, and the OCFCD Design Manual.

5. FEMA’s Flood Insurance Rate Maps, Panel No. 158J, shows the project site is within Zone X (shaded) and some areas along Santiago Creek within Zone AE. The City of Orange, as the floodplain administrator for areas within its municipal boundaries, should ensure that all applicable FEMA floodplain regulations and requirements are met.

6. OCFCD does not have property rights on the segment of Santiago Creek within the project area. If any proposed improvements to Santiago Creek are to be turned over to OCFCD for ownership and maintenance, all such improvements must meet OCFCD’s standards. All improvements will need to be designed and constructed to OCFCD’s current design criteria and standards, and the rights-of-way for the facilities will need to be dedicated in a form acceptable to OCFCD. An agreement between the project proponent and OCFCD is necessary to address right-of-way, design details, operation and maintenance, construction inspection, etc.

7. Low flow, dry weather, urban runoff generally promotes vegetative growth. Hydraulic impacts to Handy Creek Channel (E08S06) should be analyzed using the degree of vegetation that can be expected to be present in Handy Creek as well as Santiago Creek. The water surface elevation in Santiago Creek due to the presence of full grown, dense vegetation (Manning’s “n” value = 0.17 per OCFCD Design Manual) may be elevated and therefore may impact Handy Creek. Any adverse impacts to Handy Creek should be appropriately mitigated in consultation with OC Public Works/OC Infrastructure Programs.

8. All work within or adjacent to any OCFCD right-of-way for regional flood control facilities (such as Handy Creek) should be conducted so as not to adversely impact channel’s structural integrity, hydraulic flow conditions, access and maintainability. Furthermore, all work within OCFCD’s right-of-way should be conducted only after an encroachment permit for the proposed work has been obtained from the County. For information regarding the permit application process and other details please refer to the County Property Permit Section link on OC Planning’s website http://ocpublicworks.com/gov/pw/ds/.

**OC Public Works - Project Development - Trails**

1. The project area includes a critical length of a missing portion of the master-planned Santiago Creek Regional Riding and Hiking (dirt) Trail and a missing portion of the master-planned Santiago Creek Regional Class I (paved, off-road) Bikeway. The trail and the bikeway are proposed to extend from the existing parking/staging lot immediately downstream of Cannon Street then east and upstream to the end of the subject development boundary with an eventual connection to County’s Santiago Oaks Regional Park. Trails are described in the County’s Recreation Element of the Orange County General Plan while the bikeway is part of County’s Bikeway Plan and also in OCTA’s Commuter Bikeways Strategic Plan.
2. Riding and Hiking Trails are used by walkers, joggers, runners, mountain bicycle riders and equestrian riders. Class I Bikeways are used mostly by commuter and recreational bicycle riders and pedestrians.

3. Trails surfaces are either compacted native soil or stabilized decomposed granite. Bikeways are commonly paved with asphalt concrete.

4. A minimum trail width is 16 feet (10' of usable trail tread and 3' of a parallel shy-distance). Bikeways have a minimum paved width of 10 feet, and preferably 12 feet. Bikeways also have a 2' parallel shy-distance for a total of 14' to 16'.

5. In its comments on past development proposals for this property the County sought the dedication of an easement for riding and hiking trail purposes and an easement for Class I Bikeway purposes, including but not limited to the design and construction of the trail and the bikeway, any bridge crossings over Santiago Creek and landscaping. The County will request the new project incorporate these same facilities once again.

**OC Parks – Planning and Design**

1. Preliminary review shows that this project has nexus to regional trails and regional bikeways per the recreation and transportation elements of the General Plan. OC Parks will have some specific comments as the development progresses. For now, we would just note that the regional trails and bikeways, built and proposed, from the general plan recreation and transportation elements, should be indicated on all future site plans so that we can see how they are incorporated and addressed within the development.

If you have any questions regarding these comments, please contact Flood Programs, Anna Brzezicki at (714) 647-3989 or Robert McLean at (714) 647-3951, in Project Development-Trails, Jeff Dickman at (714) 647-3937, in OC Parks- Rory Paster at (714) 923-3716, in OC Development Services Linda Smith at (714) 667-8848.

Sincerely,

Laree Alonso, Manager, Planning Division
OC,Public Works Service Area/OC Development Services
300 North Flower Street
Santa Ana, California 92702-4048
Laree.alonso@ocpw.ocgov.com

cc: Anna Brzezicki, OC Flood Programs
    Robert McLean, OC Flood Programs
    Jeff Dickman, OC Project Development – Trails
    Rory Paster, OC Parks – Planning and Design
March 31, 2017

Robert Garcia, Senior Planner
City of Orange
Community Development Department
300 East Chapman Avenue
Orange, CA 92866

Re: Notice of Preparation — DEIR The Trails at Santiago Creek Project

Dear Mr. Garcia:

Irvine Ranch Water District (IRWD) has received and reviewed the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the Rio Santiago Project. IRWD offers the following comments.

IRWD wishes to reiterate the comment provided in its June 12, 2013 comment letter related to the Rio Santiago Project. While this project is not specifically within IRWD jurisdiction, a portion of this project is within the former Carpenter Irrigation District area which was annexed by IRWD. As the successor water district to Carpenter Irrigation District, a thorough review of any IRWD rights over the Rio Santiago/Trails at Santiago Creek Project area should be conducted by the project proponent before a final map is processed. The appropriate actions as to the disposition of any IRWD rights should be coordinated through IRWD’s Planning and Technical Services Division. Please contact IRWD’s Right-Of-Way Agent, Ray Thatcher, at (949) 453-5602 to address this issue. Additionally, prior to development plan submittal and approval, the developer shall coordinate with IRWD’s Planning and Technical Services Division to develop a technical memorandum or Sub-Area Master Plan Addendum for this project. Please contact Eric Akiyoshi, Principal Engineer at (949) 453-5552 to further discuss this requirement.

IRWD appreciates the opportunity to review and comment on the DEIR. If you have any questions or require additional information, please contact the undersigned or Jo Ann Corey, Engineering Technician III at (949) 453-5326.

Sincerely,

Fiona M. Sanchez
Director of Water Resources

Cc: Eric Akiyoshi, IRWD
    Ray Thatcher, IRWD
    Jo Ann Corey, IRWD
City of Anaheim
PLANNING AND BUILDING DEPARTMENT

April 3, 2017

Robert Garcia
Senior Planner
City of Orange
300 E. Chapman Avenue
Orange, CA 92866

by email to: rgarcia@cityoforange.org

Subject: City of Orange Notice of Preparation of a Draft Environmental Impact Report for the Trail at Santiago Creek Project

Dear Mr. Garcia:

Thank you for the opportunity to review and comment on the above-referenced document. City of Anaheim staff offers the following comments:

Public Works Department: Traffic Engineering Division

Please contact Kathy Nguyen, P.E. at (714) 765-4439 or knguyen1@anaheim.net with questions pertaining to this section.

Any City of Anaheim intersections that are analyzed as part of a Traffic Impact Analysis shall be analyzed in accordance with the City of Anaheim Traffic Impact Studies Criteria.

Please forward any subsequent public notices regarding this project to my attention at the address listed at the bottom of the first page of this letter. If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5238 or csounders@anaheim.net.

Sincerely,

Christine Saunders
Associate Planner

Cc: Kathy Nguyen, Public Works Department, Traffic Engineering
Rafael Cobian, Public Works Department, Traffic Engineering
David Kennedy, Public Works Department, Traffic Engineering
Susan Kim, Planning and Building Department, Planning Services
April 3, 2017

Mr. Robert Garcia  
Community Development  
Planning Division  
300 East Chapman Avenue  
Orange, CA 92866  

SUBJECT: Review of Notice of Preparation for EIR for City of Orange Trails at Santiago Creek Project

Dear Mr. Garcia:

The City of Irvine reviewed the above referenced project and has the following comments:

1. Given the potential rezoning of the 50 acres on-site to provide various land use alternatives, the traffic analysis for the EIR should be a comprehensive “Ground to Plan” analysis to identify the potential traffic impacts of each alternative being considered.

2. If impacts are identified on City of Irvine arterials or intersections based on City of Irvine performance criteria, appropriate mitigations should be identified in the findings of the EIR for all of the potentially impacted locations.

Thank you for the opportunity to review and comment on the proposed document. We would appreciate the opportunity to review any further information regarding this project as the planning process proceeds. If you have any questions, please contact me at 949-724-6521 or bjacobs@cityofirvine.org.

Sincerely,

Bill Jacobs, AICP CEP  
Principal Planner

cc: Sun-Sun Murillo, Supervising Transportation Analyst
April 3, 2017

Mr. Robert Garcia  
City of Orange  
300 E. Chapman Avenue  
Orange, CA 92666  
rgarcia@cityoforange.org

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Trails at Santiago Creek Project (SCH# 2017031020)

Dear Mr. Garcia:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Trails at Santiago Creek Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of Orange (City) is a non-participating landowner under the Central/Coastal Orange County NCCP/Habitat Conservation Plan (HCP).

The 109 acre project area is located at 6118 East Santiago Canyon Road within the City, east of State Route 55 and west of State Route 261. The project, which has a history of surface mining and materials recycling, will develop 150 single family homes on 50 acres, leaving the remaining 59 acres as open space. A portion of Santiago Creek, which contains perennial flow, runs through the project area. This riparian area has been documented to support least Bell's vireo (Vireo bellii pusillus), which is listed as endangered under CESA and the federal Endangered Species Act (ESA). Coastal California gnatcatcher (Polioptila californica californica), which is listed as threatened under ESA and is a State Species of Special Concern, is located in the upland portions of the project area.

The Department offers the following comments and recommendations to assist the City in avoiding or minimizing potential project impacts on biological resources.

Specific Comments

1. A project to restore southern willow riparian forest in Santiago Creek is being planned directly downstream from the project area, on the former Chandler Mine property. The Department believes reduction of indirect impacts of the project on Santiago Creek could be achieved through collaboration downstream, to preserve and/or improve continuous riparian habitat between the two properties. We recommend the DEIR analyze the indirect impacts of any project activities on Santiago Creek in light of additional projects in the immediate

Conserving California's Wildlife Since 1870
area and include a discussion as to whether collaboration, avoidance, or mitigation measures are necessary in order to bring indirect impacts to Santiago Creek below a level of significance.

2. Additionally, the Department recommends that the DEIR analyze how changes in land use would be implemented. The analysis should include specific maintenance standards for the conserved open space to avoid, minimize, or mitigate the new potential changes in extent, severity, and duration of adjacent land-use as well as habitat maintenance of the property (e.g., edge effects). Edge effects are defined as undesirable anthropogenic disturbances beyond urban boundaries into potential wildlife habitat and have negative impacts on sensitive biological resources in Southern California. To avoid or minimize project-related edge effects on sensitive habitat, we recommend the project include a biological buffer, protective barriers (e.g., fencing), public notification (signage) of the sensitivity of the area, and a project design that prevents open space fragmentation. We also recommend that all structures are placed far away from the riparian corridor as possible.

3. The Department is also concerned about increased flow to Santiago Creek from urban runoff and stormwater impacts, as increased flow can cause scouring and incising of banks. In order to minimize this impact, the Department recommends that the DEIR analyze the efficacy of Low Impact Development (LID) options to minimize storm water impacts, including:

a. Site layout with regard to sensitive resources, including off-site native habitat,

b. The use of pervious surfaces (crushed aggregate, turf block, unit pavers, pervious concrete and asphalt) as alternatives to impervious surfaces, and

c. Structure roof spouts emptying over pervious surfaces.

If it is anticipated that runoff cannot be dispersed through LIDs, the DEIR should consider directing runoff to facilities designed to detain and treat runoff, such as detention or bioretention basins. Storm water impacts should be explored throughout the project footprint as well as off-site native habitat.

4. Further avoidance of direct impacts to birds, particularly migratory species, can be achieved through incorporation of “bird safe” elements in architectural design. Elements such as glazed windows, well-articulated building facades, and minimal nighttime lighting are encouraged to reduce collisions of migratory birds with buildings. Large flat windows, reflective glass, and transparent corners are strongly discouraged. We recommend that the City follow as many of these guidelines as appropriate when considering structure design, as described in San Francisco’s Standards for Bird Safe Buildings (the document can be found online at: www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird-Safe_Buildings_8-11-11.pdf).

5. The Department considers all fuel modification zones to be part of the project’s impacts, and as such it should be included in the calculation of the project’s impacts to habitats and species. In the DEIR, all fuel modification zones should be assessed as part of the project area and an assessment of biological resources within the fuel modification zones and potential impacts thereto should be analyzed.
General Comments

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.

a. The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.1 Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

b. The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.2

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2 A notification package for a LSA may be obtained by accessing the Department’s web site at www.wildlife.ca.gov/habcon/1600.
2. The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR.

a) The document should contain a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.

b) A range of feasible alternatives should be included to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

**Biological Resources within the Project’s Area of Potential Effect**

4. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The DEIR should include the following information.

a) CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.

b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see http://www.dfg.ca.gov/habcon/plant/). The Department recommends that floristic,
alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008³). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department’s California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.

a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.

b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife

corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.

c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

7. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

8. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

9. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503.5 and 3513 of the California Fish and Game Code prohibit take of all raptors and other migratory nongame birds and section 3503 prohibits take of the nests and eggs of all birds. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest
buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seedling rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

12. The Polyphagous and Kuroshio Shot Hole Borers (SHBs) are invasive ambrosia beetles that introduce fungi and other pathogens into host trees. The adult female (1.8-2.5 mm long) tunnels galleries into the cambium of a wide variety of host trees, where it lays its eggs and propagates the *Fusarium* fungi species for the express purpose of feeding its young. These fungi cause *Fusarium* Dieback disease, which interrupts the transport of water and nutrients in at least 43 reproductive host tree species, with impacts to other host tree species as well. With documented occurrences throughout Southern California, the spread of SHBs could have significant impacts in local ecosystems. Therefore, with regard to SHBs, we recommend the DEIR include the following:

a. a thorough discussion of the direct, indirect, and cumulative impacts that could occur from the potential spread of SHBs as a result of proposed activities in the DEIR;

b. an analysis of the likelihood of the spread of SHBs as a result of the invasive species’ proximity to above referenced activities;

c. figures that depict potentially sensitive or susceptible vegetation communities within the project area, the known occurrences of SHB within the project area (if any), and SHB’s proximity to above referenced activities; and

d. a mitigation measure or measure(s) within the final MND that describe Best Management Practices (BMPs) that bring impacts of the project on the spread of SHB below a level of significance. Examples of such BMPs include:

i. education of on-site workers regarding SHB and its spread;

ii. reporting sign of SHB infestation, including sugary exudate ("weeping") on trunks or branches and SHB entry/exit-holes (about the size of the tip of a ballpoint pen), to the Department and UCR's Eskalen Lab;

iii. equipment disinfection;

iv. pruning infected limbs in infested areas where project activities may occur;

v. avoidance and minimization of transport of potential host tree materials;

vi. chipping potential host materials to less than 1 inch and solarization, prior to delivering to a landfill;
vii. chipping potential host materials to less than 1 inch, and solarization, prior to composting on-site;

viii. solarization of cut logs; and/or

ix. burning of potential host tree materials.

Please refer to UCR's Eskalen lab website for more information regarding SHBs: http://eskalenlab.ucr.edu/pshb.html.

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Jennifer Turner at (858-467-2717) or jennifer.turner@wildlife.ca.gov.

Sincerely,

[Signature]

Gail K. Sevrens
Environmental Program Manager
South Coast Region

cc: Colleen Dragesku (U.S. Fish and Wildlife Service)
    Scott Morgan (State Clearinghouse)
April 3, 2017

Robert Garcia, Senior Planner
Planning Division
Community Development Department
City of Orange
300 East Chapman Avenue
Orange, CA 92866

Dear Mr. Garcia:

Subject: Notice of Preparation of a Draft EIR for The Trails at Santiago Creek Project, SCH #2017031020

The Orange County Water District (OCWD, the District) appreciates the opportunity to review and comment on the Notice Of Preparation (NOP) of a Draft EIR for The Trails at Santiago Creek Project.

OCWD was established by the State of California in 1933 to manage the Orange County Groundwater Basin. Water produced from the basin is the primary water supply for approximately 2.5 million residents in Orange County. OCWD maintains and operates facilities in the cities of Anaheim and Orange to recharge surface water into the groundwater basin. Santa Ana River baseflows and stormflows as well as Santiago Creek flows are a significant source of the water supply used to recharge the basin.

The proposed project involves the development of a “worst case” analysis for the development of up to 150 single family dwellings on approximately 50 acres of the 109-acre-site, with the remaining 59 acres proposed as natural greenway and open space.

The area of the proposed project is generally located upstream of the Santiago Basins, OCWD-owned basins operated for groundwater recharge. Water in Santiago Creek and water diverted from the Santa Ana River to Santiago Basins through OCWD recharge facilities are percolated into the Orange County groundwater basin. Please include an analysis of any potential impacts to the water quality in Santiago Creek and to groundwater quality from the proposed project.
We note that the former Villa Park Landfill (Geotracker # L10009578462) is located near the proposed project site and is under active monitoring by the County of Orange. Please consider the potential impacts to surface water quality and groundwater quality that could occur from the proposed project due to any remaining legacy contamination that may present on this site.

As developments within the proposed project area may increase impermeable surfaces on-site, development of a Water Quality Management Plan (WQMP) may be required to comply with Order No. R8-2009-0030 or future successor permits, otherwise known as the MS4 Permit for Orange County. Section XII.B.5 of the permit sets minimum requirements for structural infiltration BMPs to protect groundwater resources. Section VIII.7 of the Technical Guidance Document Appendices, which were developed by the County of Orange to satisfy MS4 permit terms, states that infiltration activities should be coordinated with OCWD to ensure protection of groundwater quality and recommends that coordination is initiated as early as possible in the process of developing the Preliminary/Conceptual WQMP. The Technical Guidance Document identifies circumstances where infiltration of surface water could pose a risk to groundwater quality and specifies conditions where on-site infiltration may not always be feasible.

If you have any questions regarding these comments, please contact me at 714-378-3275 (gwoodside@ocwd.com).

Thank you for the opportunity to submit these comments.

Sincerely,

Greg Woodside, P.G., C.Hg.
Executive Director of Planning and Natural Resources
April 3, 2017

Robert Garcia, Senior Planner
Community Development Department
City of Orange
300 East Chapman Avenue
Orange, CA  92866

RE:  Comments on “The Trails at Santiago Creek” NCP

Dear Mr. Garcia:

Friends of Harbors, Beaches and Parks (FHBP) is an Orange County nonprofit organization with a stated mission to protect natural lands, waterways and beaches. In addition to our coalition of some 80 conservation and community groups, FHBP has more than 5,000 individual members who support our regional work. We are writing you concerning the City’s Notice of Preparation for the proposed “The Trails at Santiago Creek” project (formerly “Rio Santiago”) in the City of Orange.

The entire project property is a flood plain for Santiago Creek and also sits downstream of two earthen dams. In addition to periodic flooding, the acreage is subject to inundation in the event of a dam failure. The site’s 110 acres depicted on FHBP’s “Green Vision Map” is not simply “hoped for” open space; it is a vital buffer zone allowing the creek to naturally meander and overflow its terraces without threatening life or property. Without that buffer, the creek becomes a liability for whoever has responsibility for it. That’s why FHBP opposes any development that ignores the historic nature of the watershed.

We have the following comments that we believe are pertinent to the proposed project:

1) General Plan: The developer's proposal to amend the City’s General Plan for much of the site from Resource Area (RA) to Residential conflicts with the City's existing plan designations for Open Space in the adopted East Orange General Plan and the Orange Park Acres Specific Plan. Consideration of such a dramatic amendment of the long-standing intentions for the site should involve analysis of various alternatives selected from community meetings and resident suggestions. A single scoping meeting after the developer has submitted a formal application appears to demonstrate minimal interest in any community concerns and a conflict with the spirit of the California Environmental Quality Act (CEQA).

2) Zoning and Designations: The Draft EIR (DEIR) should address the proposed intensification of the site and should be required to show no significant impacts to the adjacent community. As comments from the Scoping Meeting on March 16, 2017 demonstrated, the proposed project's scale, intensity and design is a matter of great concern with members of the adjacent residential community.
3) The Draft EIR should include:

a. No Statements of Overriding Consideration (SOCs). Any project in such a critical location should be designed to avoid SOCs. SOCs are essentially admissions that a developer is unable to avoid significant community impacts from their proposed project.

b. Analysis of Potential Significant Impacts: Among the issues that we suggest should be addressed in the DEIR, the following potential environmental impacts are of great concern:

1. Grading and Construction Impacts
2. Long Term Visual Impacts
3. Light and Glare Impacts
4. Air Quality Impacts
5. Noise Impacts
6. Hydrology and Water Quality Impacts (including dam inundation, urban runoff, and flooding)
7. Traffic Impacts (including intersection capacities, turn pocket stacking and parking)
8. Greenhouse Gas Emissions Impacts
9. Cumulative Impacts (Aesthetics, Air Quality and Traffic)

c. A full analysis of compliance with the Sustainable Communities Strategy should be prepared.

d. All reasonable alternatives should be adequately analyzed.

e. Existing land use plans should be adequately analyzed and complied with.

f. Hazards must be adequately analyzed. This analysis should include both natural hazards due to the site being in a river course with documented extraordinary flooding, and man-made hazards due to the nearby landfill of unknown materials and the recent years of unsupervised fill of unknown materials on the site.

Nearly 100 acres of the site has been designated as permanent open space by four planning documents dating back to the 1970s. FHBP believes that those plans should be adhered to, and that the creek cannot be isolated for preservation while the neighboring land is developed. We suggest that the project proponent scale back the current proposal, even beyond the "Alternative E" that was posted at the Scoping Meeting.
The California Supreme Court's ruling in the Banning Ranch case (*Banning Ranch Conservancy v. City of Newport Beach et al.*) handed down last week emphasizes the importance of EIR adequacy, including the adequate disclosure and analysis of the environmental impacts of all alternatives, to ensure informed public participation and a full understanding of all impacts by government decisionmakers.

We will continue to monitor this project proposal and provide additional comments as appropriate.

Sincerely,

/s/

Gloria Sefton
Vice President
The traffic on Santiago and Cannon is horrendous. We do not need anymore development of homes, condos or senior housing. We need to stop all developers especially those from out of state from developing on any spare land available. All the beauty of Orange County has been taken over by homes, condos, malls, buildings, etc. Please stop this development and open the area from Jamboree to Weir Canyon to eliminate the traffic from Santiago and Cannon. This is a real problem to our communities with noise, congestion, speeding vehicles and our quality of life. Thank you for your time.
Rosemarie Reynolds
Mr. Garcia,

Please hear our plea to reconsider development of Sully Miller. The traffic is horrible and adding more would make it completely unsafe and unbearable. It’s so sad. I lived in Orange Park Acres since 1978 and it was peaceful, tranquil, with a country atmosphere. I’ve seen it change drastically. We moved recently up the hill (Cannon). The traffic coming up the hill is terrible and it starts from the Toll road and precedes along Santiago road. What happened to this community?

Thank you,

Kathy Corrigan
Mike Sole
544 S.Indian Trail
Anaheim, CA 92807
949 275-6903
Top of the morning Mr. Garcia.

Just a brief note from a happy Orange City resident of Mabury Ranch for some 36 years now.

I would greatly appreciate your help in avoiding development on the north side of Santiago Creek.

I, my family, and the neighbors that have mentioned the development options by Milan REI X are

Against option F.

I know your work is often difficult. Rest assured, your interest in hearing the voices of the people of Orange is greatly appreciated.

All the best,
Bob
Robert A. Hoff
Dear Mr. Garcia,

Ms. Barbie Stevenson has previously written to you and outlines the concerns of most of the East Orange residents so well that I have provided the copy for you again below.

In addition, for due diligence I encourage you to take a drive out to Irvine Lake in the late afternoon on a weekday then turn around and drive back past Irvine Park, behind Santiago Community College along Santiago Canyon Rd and turn right on Cannon St. You will quickly see and experience how the road can't handle the traffic it has on it right now. Developing the parcel at Cannon/Santiago Cyn Rd will add an unimaginable amount of delay and traffic to an already impacted area, not even considering what the additional homes by Irvine Park will do.

The congested area is all along the proposed Trails development site which will make entering and exiting that neighborhood in the mornings and in the evenings a nightmare, not to mention the additional delays for cars merely driving (crawling) by. Additional stoplights and turn lanes would be needed which would quickly become a traffic snarl. As it is, the traffic heading East on Villa Park Rd to turn left onto Cannon backs up well past where the turn lane starts which further delays traffic down to the light at Hewes/VP Rd and even down into the reservoir, periodically.

The road system simply can not handle the additional proposed homes. Until a solution to that is done, considering adding in additional homes is foolhardy and detrimental to the long-term social, economic, and environmental vitality of the area.

The environmental concerns and impact to surrounding neighborhoods is very well laid out by Barbie below.

"Mr. Robert Garcia,

Thank you for having a scoping meeting on March 16, 2017 regarding the Trails at Santiago Creek Development Project. In the meeting, you requested we send you our environmental concerns via email. Below are just a few preliminary concerns I have with the proposed project:

1. Traffic: As you are well aware, the current traffic on Santiago Canyon/Cannon is reaching epic proportions. A few miles can take up to 30 minutes to complete. In our formerly serene neighborhood, the current situation is unbearable. Adding additional homes would only exacerbate the issue. Per the OC Register (5/7/2014) the intersection at Jamboree and Chapman is THE most dangerous and deadly intersection in Orange County. I would hate to think the Orange City Planners are accepting and/or comfortable that their decision on this development may be a fatal one. As I mentioned in the meeting on March 16, another traffic light is not a solution. We need a solution that takes motorist out of this path and onto an alternative route, out of our neighborhoods.

2. Traffic Alternatives: In doing additional research, it appears that Jamboree Road was initially slated to continue through to Weir Canyon. Per Ed Knight, former Community Development Director, this extension was in the OC Master Plan of Arterial Highways and in the City of Orange General Plan (OC Register 8/21/2013). On November 5,
2005, the City approved the East-Orange Planned Community (I believe Santiago II) they also approved to STOP this extension citing they no longer felt this was needed. However, the Santiago II development of approx. 1180 homes is slated to be adjacent to Peters Canyon on Jamboree, and south of Irvine Lake between Jamboree and the Transportation Corridor. This site is to be developed in 2019, again causing additional congestion and health and safety concerns.

2a. Traffic Alternatives: Perhaps Sully-Miller and/or City can also approach the owners of the transportation corridor and propose adding an additional exit (or two) off the Toll Road. Currently Santiago is the last exit prior to the 91 Freeway. Again, the current lack of alternatives is causing additional traffic and congestion.

2b. Traffic Alternatives: Please note, if one of the solutions is to extend Orange Park, Yellowstone, Lassen or Mt McKinley through Mabury Ranch. I will be an activist to get Mabury Ranch and create a private road. Again, this is not a solution.

3. Existing poor City Planning: I cannot find any data stating that a Jamboree extension was considered when Serrano Heights was developed. This area was developed over several years in the early 90’s and added 1180 homes. The development of Serrano Heights is a major cause of traffic on Santiago, Cannon, and Serrano. Traffic issues and concerns were addressed with the City back in 2005, yet seem to have fallen on deaf ears. The Mabury Ranch HOA sued the City over these issues. All of the predictions have come true. The traffic is a nightmare and numerous accidents occur on Serrano and Cannon on a monthly basis.

4. Flooding: The land in question is in a FEMA designated Flood Plain. At the meeting you seemed surprised by this information, and told us to “write it down”. However, I was able to find this information within minutes by going onto the OCFlood.com website, a city website, www.ocflood.com. This redirected me to a FEMA site and I have attached a copy of the map for your edification. On Feb. 26, 1969, this area flooded and two homes were swept away. Again, I cannot imagine the City Planners would be comfortable if homes and potentially lives were lost due to their poor due diligence on this development.

5. Flora/Fauna: I have not even addressed the numerous plants, animals, and wildlife that live in this area. By disturbing ecological balance of coyotes, rabbits, birds, fish, mountain lions, etc…we potentially have our livestock threatened, our family pets and small children threatened, our home landscaping threatened by these animals. When we develop, we drive them out of their natural habitat. This needs to be reviewed.

6. The existing Methane Field: This acreage is the Villa Park Refuse and Disposal Station Number 22, located on the northeast corner of Santiago Canyon and Cannon. The city of Fullerton settled a legal battle for 2.5 million dollars when residences were built NEAR the McColl landfill. The settlements by builders were also in the millions. We need to learn from our neighbors. As a community, we cannot afford litigation on a development we did not want in the first place.

That leads me to my final concern. Why does this land have to be developed? You asked the room to write down their "environmental" concerns and deliver to you. Let’s go back further, and not develop the land at all. Why does the city continue to get into relationships with developers? Stop! We do not want this land developed. We have serious concerns with the current situation let alone the additional impact of houses, cars, and people on our neighborhoods. Let’s preserve this natural open space for all residents to enjoy and NOT develop.

Sincerely,

Barbie Stevenson
Mabury Ranch Homeowner"

Thank you for your time and consideration of the legitimate and extensive concerns of existing tax-paying residents of East Orange’s neighborhoods,

Danielle King
Orange resident (off Taft/Cannon)
Dear Mr. Garcia,

I am a home owner in the Maybury Ranch neighborhood, which is adjacent to the property which currently has proposed plans for The Trails at Santiago Creek Project. I am writing to voice my concerns about developing this land.

I am opposed to a residential community of 150 homes to be built directly adjacent to Maybury Ranch, with access to the community from Maybury Ave. The construction of these homes as well as the community itself will impact the peaceful nature of our community. Many people walk, jog and bike along the trail that runs along Maybury Ave., next to the area for the proposed construction or they access the trails that wind through the beautiful hills. This would be forever ruined if a new community of homes is built adjacent to Maybury Ranch. The project would also impact the wildlife in the area, and Santiago Creek, which is another aspect of the peaceful natural surroundings in which we live.

Another concern about developing this land, particularly with a residential community, is the already congested traffic situation in the area. Santiago, Cannon and Serrano are heavily traveled at commute times. I would encourage you and other decision makers on this project to visit the area at peak commute times, to see for yourselves how congested it is. Instead of adding to an already existing problem, I would recommend you spend some time on a solution to the traffic problem.

Other concerns I have are noise and light pollution, the impact on property values of our neighborhood, the methane gas from the former landfill site and flood issues.

One of the reasons Maybury Ranch is so desirable to live in, is for it’s peacefulness and it’s feel of a small community. Any adjacent communities or through streets would ruin this. I know I am not the only resident that has these concerns. I hope you will seriously consider all of the opposition there is to The Trails at Santiago Creek and specifically, the residential community proposed to be built directly adjacent to Maybury Ranch.

Thank you,

Jennifer Pirt
Dear Mr. Garcia… My name is Mark Maize and I was born in Orange 66 years ago and have resided here my entire life. My current residence has been in Orange Park Acres since 1995 and I wanted to take this time to bring to your attention my concerns regarding the proposed Trails at Santiago Creek Project. Please address the following issues in your upcoming Draft EIR:

1) Orange Park Acres has been keep as rural as possible since it’s inception both from a legal planning sense and the desires of the citizens of Orange. Old Town has it’s character, tracts of homes in Orange have theirs, the Eichler tracts are now being recognized to be preserved, business areas have theirs and OPA’s Equestrian life style is the focus at that location. Just like Old Town and all the others, please focus on keeping what OPA was intended to be…Rural/Equestrian estates surrounded by open space.

2) Regardless of what layout the current plan turns into, work within the currently allowed zoning and Specific plans already in place, such as OPA Specific and Orange General Plans.

3) Base any housing study in the report on a maximum of 25, 1 acre residential equestrian home sites.

4) Address the flood plan mitigation adequately regardless of the development content plan.

5) Address the methane gas traveling from the recovery site west of the development into the Trails at Santiago Creek site regardless of the development content plan.

6) Incorporate un-paved equestrian friendly trails throughout, that connect to the existing trail system in Santiago Oaks park and the trail leaving northwest to the Villa Park area.

7) Address the traffic in and out of the development on Santiago Canyon Road.

8) Address the Equestrian crossing which will be needed to access the trail system within the project from the south side of Santiago Canyon Road.

9) Consult with all parties from OPA, formal and otherwise on trail development.

10) Provide development which enhances and promotes the communities already existing equestrian life style such as stables, Arenas, trails, animal facilities, 4H activities, gardening and agriculture.

11) Keep the creek continuous and open with natural banks and landscaping through the middle of the project.

12) Demonstrate how mitigation of all the toxic waste left behind by the mining operation will be mitigated.

13) Focus on MAP “E” citizen plan…. this plan is the most acceptable to date to the community.
Thank you for your attention to these items... Let's do this!!!.... The community at large will support development of the Sully Miller site, but the OPA Equestrian Life style and specific plan guidelines must be supported along the way....

Sincerely,
Mark Maize
Mr. Robert Garcia,

Thank you for having a scoping meeting on March 16, 2017 regarding the Trails at Santiago Creek Development Project. I am writing to express my concerns with the proposed project.

First, the current traffic on Santiago Canyon/Cannon is horrible. The development of Serrano Heights is a major cause of traffic on Santiago, Cannon, and Serrano. A few miles can take up to 30 minutes to complete. In our formerly serene neighborhood, the current situation is unbearable, as people speed through our streets, seeking a way around the traffic back-up on Serrano. Adding additional homes would only exacerbate the issue. We need a solution that takes motorist out of this path and onto an alternative route, out of our neighborhoods.

In addition, the land in question is in a FEMA designated Flood Plain. On Feb. 26, 1969, this area flooded and two homes were swept away. This acreage is also the Villa Park Refuse and Disposal Station Number 22, located on the northeast corner of Santiago Canyon and Cannon. Moreover, numerous plants, animals, and wildlife live in this area. By disturbing ecological balance of coyotes, rabbits, birds, fish, mountain lions, etc...we potentially havoc our livestock threatened, our family pets and small children threatened, our home landscaping threatened by these animals. When we develop, we drive them out of their natural habitat. This needs to be reviewed.

In short, we do not want this land developed. We have serious concerns with the current situation, which would only be exacerbated by the additional impact of houses, cars, and people on our neighborhoods. Let's preserve this natural open space for all residents to enjoy and NOT develop.

Sincerely,

Angela Knarr
Mabury Ranch Homeowner
Robert Garcia

From: joy fletcher <joy.fletcher@att.net>
Sent: Saturday, March 25, 2017 4:22 PM
To: Robert Garcia
Subject: zoning change to increased density and connection to Mabury St.

Garcia,
Community Development Department

Dear Mr. Garcia.

I am extremely opposed to changing current zoning to increased density for MORE homes to be built North of Santiago Creek and especially connecting to Mabury Avenue. This area is special and unique and I spent over a year look area such as this for my children, grandchildren and myself when I am unable to care for myself any longer. The proposed changes would cause even more traffic congestion on Cannon, Serrano and certainly on Santiago, plus Mabury. I am very concerned that if the Zoning were changed, there would be more air pollution, noise and disruption of wildlife in the surrounding area. Santiago Creek also need to be returned to its natural condition and. So many changes have been made already. Not only myself, my family, neighbors who have resided here for a long time, but others, enjoy the serenity, quietness, beauty.

and pleasant atmosphere for hiking and enjoyment in the surrounding area. Please consider this as you make your decision. NO MORE DENSITY.

J. Fletcher
6209 East Mabury
Orange, Ca 92866
Mr. Garcia --- I attended the public scoping meeting on March 16th concerning the proposed Trails at Santiago Creek development in East Orange. Even though I do not support any building on this site (due to concerns over increased traffic and disrupted wildlife habitats), the only choice I found palatable was Option E. This allowed only 25 homes on this site. I sincerely hope this is the alternative that the City Planning Department agrees is feasible.

Sincerely,

Frank Lesinski
Mabury Ranch Homeowner
6618 East Waterton Ave.
Orange, CA.
My name is Paul Andrews, I reside on E. Clark ave with my wife Janet and have for the past 19 years. My wife has been a resident for over 35 years.

Milan Capital, from their website: The company describes itself as focused on the purchase, development and management of multi-family and commercial properties. It looks for undervalued commercial or residential real estate and redevelops it to increase its worth. It does this by converting single tenant buildings to multiple tenants, or reconfiguring multiple building sites to increase usage. It also looks for land entitlement and development opportunities.

Facts. Sully Miller is in a flood plain. Information straight from the website of your employer, the city of Orange, states that, backed by data from the Army Corps of Engineers and FEMA. It is also in an area subject to liquefaction in the event of a major earthquake. Upstream are two earthen dams, one closing in on 100 years old. One dam failure in Los Angeles and the most recent one in northern California should be a warning. Pennsylvania 1889, Teton Dam Idaho 1976, St Francis dam 1928, Swift dam 1964, Spalding pond dam 1963 are great examples of aging earthen dams that failed. Oroville recently was a disaster that squeaked by but not for long. In our need to store more and more water and the natural cycles of drought to deluge Irvine lake dam and villa park dam are just waiting to happen.

February 26, 1969 the Santiago creek flooded. Old Photos show the army corps of engineers helicopters dropping old vehicles into the raging waters to attempt to divert the flow and save some homes. Santiago boulevard used to connect over the creek but now dead ends just past Blue ribbon nursery. Interesting that they never built the bridge again.

Traffic. During rush hours traffic along Santiago canyon is at a standstill. Add the expansion of the Salem school to the list and we have a log jam. A recent traffic light failure and with the magic of a phone App called Waze, traffic was being diverted to the narrow streets of Frank and E. Clark where speeding cars competed with riders on horseback and dog walkers. Rhindall and other streets were no better, Orange Park boulevard was a single line of traffic from Santiago Canyon to Chapman. The recent closing of Ortega Hwy sent hundreds of new commuters scrambling to get to the 91 and over the mountains.

Liability. Interesting how the developer eagerly wants to donate the area surrounding the creek to the parks or county. Why? Let’s go back to the flood plain topic. Once it floods the neighborhood, guess who the finger points to, the taxpayer and the city.

Methane gas. It travels, farther than you think. Let’s have a comprehensive and exhaustive analysis of the area to truly determine how far the gas has traveled underneath the ground. Also the area was used as a dump for oil and batteries during the processing of the soil during the Sully Miller days. Do we really know the environmental issues that lie beneath the ground or just what the developer has told us. During the grading process what did the developer find and how is it polluting the water table underneath. Remember, the creek runs into the settling reservoirs downstream that is our drinking
water. What steps will be taken to ensure that previous dumping of toxic material, once unearthed, will not seep into the creek.

Carcinogens and the previous dump site. After the recent rains not one single plant or blade of grass has grown on the site of the former dump site. If not even a single blade of grass could grow, why would the city permit housing to be built next to it.

In summary, I feel this site is not and cannot be made safe for residential housing. It was zoned open space for a reason and should remain that way.
Robert Garcia

From: Turner, Jennifer@Wildlife <Jennifer.Turner@wildlife.ca.gov>
Sent: Monday, March 27, 2017 9:27 AM
To: Draguesku, Colleen
Cc: jeff johnson (jeff@pacificbioscience.com); Robert Garcia
Subject: RE: OC Reclamation- adjacent development

Please note that I incorrectly provided Robert’s email address; the correct address is now cc’d on this email.

Thanks,

Jennifer Turner
Environmental Scientist
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123
(858)467-2717
Jennifer.Turner@wildlife.ca.gov

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From: Draguesku, Colleen [mailto:colleen_draguesku@fws.gov]
Sent: Thursday, March 23, 2017 9:50 AM
To: Turner, Jennifer@Wildlife
Cc: jeff johnson (jeff@pacificbioscience.com); rgarcia@cityoforange.com
Subject: Re: OC Reclamation- adjacent development

Hi Everyone,

Something to consider:
The "Trails at Santiago Creek" development site is occupied by the federally-listed gnatcatcher and vireo. Therefore, the impacts of the Trails project on these species will need to be mitigated, just like at the Chandler Orange Mine.

If there is "extra" riparian habitat on the Trails site after their mitigation has been assigned, the Trails developer could sell a conservation easement to Chandler for what's left over. Or, we could come up with a similar type of agreement which would allow Chandler to conduct their mitigation at the Trails.

The mitigation for Chandler and the Trails would then be contiguous, which would benefit the vireo and the ecology of the creek. Depending on timing, Chandler and the Trails could even write their HCPs together, which could reduce the overall costs of the permitting for everyone.

Thanks,
Colleen

------------------------------------------
Colleen Draguesku
Fish and Wildlife Biologist
U.S. Fish & Wildlife Service
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
(760) 431-9440 x241
colleen_draguesku@fws.gov

On Wed, Mar 22, 2017 at 3:11 PM, Turner, Jennifer@Wildlife <Jennifer.Turner@wildlife.ca.gov> wrote:

Hi Jeff:

The City of Orange has a project in the NOP stage of review wherein the project area contains the portion of Santiago Creek directly upstream from your parcel. Perhaps there is an opportunity for some collaboration? The document can be found on the City’s website at:

http://www.cityoforange.org/DocumentCenter/Home/View/3228

The project contact is Robert Garcia: (714)744-7222, whom I’ve cc’d on this email.

Cheers,

Jennifer Turner
Environmental Scientist
Prevent the spread of destructive tree pests!

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Dear Mr. Garcia,

This letter is to express concern about the recent meeting I attended concerning the development for the Trails at Santiago Creek Specific Plan. There were many plans presented, however it appeared to have this many plans merely to create confusion. My understanding was consideration was for Plan A or Plan E. Since both of these plans are far from specific, there are many concerns I wish to express.

1. What is the current zoning of this property?
2. Is there a request to change the current zoning?
3. Is there a projected number of houses that would be allowed to be built based on current zoning and based on a change of zoning?
4. How will the current traffic issue be addressed? Currently the evening traffic that I personally experience starts at Orange Park Blvd. and is bumper to bumper to turn right on Cannon and continues bumper to bumper past Serrano. Will a widening of the street be required to alleviate the additional traffic any size development and activity center would bring?
5. Santiago Canyon Road appears to be used more and more as a cut through, putting a signal to allow the future development the opportunity to enter and exit the property would only back traffic up further on that road.

As a resident of Orange, my request would be to work with the input from the residents that currently live in this area, which appears to be Plan E.

Thank you for your time,

Carol Cora
7621 E. Saddlehill Trail
Orange, CA
Dear Mr. Garcia: As a resident of Mabury Ranch im opposed to increased housing density on the Sully Miller property. Especially the building north of Santiago Creek which would connect to Mabury Avenue!! Traffic has increased and this will certainly cause tremendous congestion going over Serrano and Cannon!!! Will we have no empty space left in our hills and beautiful City of Orange!!! What a legacy to leave our children!!!! Rows and rows of houses, no wildlife, nothing but memories of what it did look like!!! Thank you for your consideration in this matter and please confirm receipt of my email!!! Enjoy your weekend!

Ann-Mari Kliss

Sent from my IPhone
Mr. Garcia,

Thank you for your time at the meeting earlier this month at Salem Lutheran School. I found the experience to be very confusing; however, I understand the process must begin somewhere. I also understand that the developer would like to get as many homes as possible on that land. That being said, my concerns are mainly that, again, this developer has purchased a parcel of land that is zoned for another purpose — and they are asking for another zone change. This parcel is under the OPA sphere of influence and that require 1 acre minimums — any change to the zoning should honor the OPA Specific plan and the East Orange General Plan. Another major concern is the traffic — and how it will effect Santiago Canyon Road which is already overloaded with cars and trucks.

I feel strongly about this developer’s plan — and I don’t see where the City or County should have to adjust any zoning to accommodate a bad business decision made by the developer when this land was purchased.

Thank you,

Cindy Davidson
Uniweb, Inc.
President & CEO
800-486-4932

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Dear Mr. Garcia,

I am writing to you regarding the Notice of Preparation of a Draft Environmental Impact Report and Public Scoping Meeting for The Trails at Santiago Creek Project. City of Orange Applications: Development Plan, General Plan/Zoning Amendment, and a Development Agreements dated March 3, 2017.

The alternative plans presented include equestrian use in Alternative A - Milan, Alternative E, Alternative F - Existing City of Orange General Plan and equestrian use may be included in other plans but not referenced in the alternatives presented. Equestrian use brings a number of impacts which need to be addressed.

Equestrian waste, and that of other livestock in the East Orange area, can contaminate the ecologically sensitive Santiago Creek. Equestrian and livestock waste may contain a number of problematic substances which were fed to the animals in the form of supplements, drugs or performance enhancers. The waste products can contaminate the watershed. Seeds from non-native plants can survive digestive tracts of some equines and livestock and go on to seed non-native plants in habitat for native plants. The non-native plants will present competition for resources to the native plants, and may reproduce in sufficient numbers as to pose a threat to native plant habitat. There should be an assessment of Santiago Creek to determine the level of equestrian and livestock waste and related substances contamination. Once that assessment is in place, steps can be taken to determine what needs to be done to protect Santiago Creek from contamination.

Issues regarding equestrian trails should also be addressed. Currently, equestrian trails abut Santiago Canyon Road, which precludes widening the road. There have been several accidents on Santiago Canyon Road caused by horses, which is dangerous and possibly lethal for everyone involved in the accident. Alternative A - Milan shows an equestrian trail located inside the project off Santiago Canyon Road, which is the appropriate place for the trail. Horses and cars are a problematic, at best, mix, and the City and County should look at long term strategies to locate the horse trails away from vehicle traffic.

Thank you for your consideration of these items.

Sincerely,

Reggie Mundekis
Thank you for the opportunity to comment on this project.  
As a 30 year plus resident of Orange (21 in Orange Park Acres) I have witnessed amazing changes, including the loss of open space, closure of neighborhood recreational golf and swimming, horrendous traffic increases from toll road and development in east Orange and Serrano Heights, community battles to preserve a semi-rural way of life etc,etc etc.

I have reviewed the current plans and Alternative Maps for the Sully Miller site and of the options presented, only Alternative E is acceptable, assuming the 25 acres residential would hold to 1 acre minimum properties, thus 25 homes. This option is the only one showing Equestrian Facilities on the south side of Santiago Canyon Rd, an important consideration for us in OPA. Community gardens, as shown on this alternative, are a fantastic addition. Increased trails for hiking, biking and horses as shown is another superior aspect of this alternative over the others presented.

Please do not strap us with a housing development of increased density and traffic. Please preserve the gem of semi rural area we have in east Orange that is enjoyed by so many who live here or visit our parks.
Thank you,
Elise Roberts
Sent from my iPad
We feel Map E is the preferable choice as long as the equestrian area is left alone and no more than 25 homes are allowed.

Bill and Lori Quarton
quartonfineart@yahoo.com  www.quartonart.blogspot.com
Mr. Garcia, after reviewing the proposals for the Sully Miller Site, I find that only Plan E is an acceptable start. Santiago Cannon Road and Cannon/Imperial simply cannot handle any more traffic the other plans bring would bring. They would create a strain on public safety access to emergencies due to the dramatic increase in traffic they would bring as well as an unsafe situation for all commuters who travel the area. It is already bad and a noticeable increase in homes would make the situation horrific. If you have not driven on Santiago Canyon Road westbound from the Toll Roads towards Cannon on a weeknight, I encourage you to do so and experience what I am talking about. It is already unsafe and bumper to bumper.

Thank you for taking my comments into consideration.

Tom Rapport
566 North Turnabout
Orange, CA 92869-2336
951-232-4302
Dear Mr. Garcia,

I would like to contribute my comments in regard to the Trails at Santiago project. I've reviewed all of the proposed maps and the only one I would be in favor of is Map E. It seems the most in line with the Orange Park Acres greater community and the best fit for the site.

An issue of great concern about this project is whether it will fit into the predominant equestrian lifestyle of the community. Will the project accommodate and promote equestrian interests, ownership, and accessibility by horseback? Any project on this site must include multiuser trails not only around the perimeter, but through the interior, as well. The developer should provide a permanent creek trail crossing (bridge preferred) to trails on the Maybury side of the creek, which currently connect to Santiago Oaks Park trails and beyond. The developer should include a horse crossing at signalized street intersections, accessing the project on Santiago Canyon Rd. to provide equestrians safe passage to connecting trails on either side of Santiago Canyon Rd. near the Mara Brandman Arena.

Thank you for your time.

Julie Maurer
7544 E Saddlehill Trl
Orange, CA 92869
(714) 742-1617
I'm happy to learn the owner/developer is interested input from the community for the 109 acre development. I live on East Amapola Ave Ave in OPA. I enjoy the fact that the parcels in the OPA area are 1 + acre plots and allow space for horses and other livestock to share the land.

I reviewed the different maps and found map E to be the one most interesting. It has the residential portion of the space along Santiago Canyon. I assume the driveway(s) to this area will connect to the Santiago. I'm sure the street can handle the additional traffic for these residents.

I would like the see the residential portion be a continuation of the OPA environment. I heard someone at the OPA mention the number of parcels would around 25. I recommend these parcels be large enough to allow horses to be on the properties. Make the environment equestrian friendly.

Maybe a small stable could be incorporated along the NE side of the residential area - the afternoon breezes from the SW would keep the denser populated horse area smelling fresh.

The organic gardens and community activity center area sounds like a very good idea too. 4-H and other community organizations would likely take advantage of the space.

Thanks,
Jerry Bohr
Mr. Robert Garcia,

Thank you for having a scoping meeting on March 16, 2017 regarding the Trails at Santiago Creek Development Project. In the meeting, you requested we send you our environmental concerns via email. Below are just a few preliminary concerns I have with the proposed project:

Traffic - As you are well aware, the current traffic on Santiago Canyon/Cannon has reached extreme levels. A few miles can take up to 30 minutes. In this part of our quiet equestrian neighborhood, the current situation is unbearable. Our neighborhoods are full of commuters cutting through now to avoid the Santiago traffic as they wind there way to the 91 fwy. We have serious concerns with the current situation let alone the additional impact of houses, cars, and people on our neighborhoods. Let’s preserve this natural open space for all residents to enjoy and NOT develop.

The existing Methane Field - This acreage, a previous refuse field, located on the northeast corner of Santiago Canyon and Cannon. Assurances and likely costly studies will need to happen to ensure there is NO contamination before green lighting a development plan. As a community, we cannot afford litigation on a development we did not want in the first place.

Sincerely,

Kate Spain
OPA Resident
Robert Garcia

From: Michael Bonnaud <litlat@mac.com>
Sent: Sunday, April 2, 2017 8:02 AM
To: Robert Garcia
Subject: Sully-Miller Project

Dear Mr. Garcia,

I live a few streets up from the Sully-Miller plant at 7136 E. Grovewood Lane. The current proposal to build residential homes on that site which is tainted with methane gas, not to mentioned the additional traffic it will bring to an already nightmarish drive, is unconscionable!
Just so I am clear, do not allow development of this property. There is absolutely nothing wrong with open space!

Sincerely,

Michael Bonnaud
Dear Mr. Garcia

As a resident of Orange Park Acres for nearly forty years and in considering the map options for the Trails at Santiago project I feel it is of utmost importance for the City to understand that only Map E is truly in the best interest of Orange Park Acres.

Our equestrian lifestyle must be protected and preserved. I would hope that the City would understand the importance and significance of our multi-user trails and take the steps necessary to see that the developer provide expansion of these trails in and around the project and work with the Orange Park Acres Association so that this can be resolved amicably and for the greater good of this equestrian community.

Thank you for your attention in this matter.

Nancy Flathers
20032 E Clark Ave
Orange CA 92869
714-639-2682
Mr. Garcia,

I live in OPA above the flower stand on located on Santiago. I have a clear view of Santiago and witness the gridlock of traffic every weekday. We drive our children to school in the morning and our 2 mile trip can take 20 minutes. It is 7/10 of a mile between Orange Park and Cannon. There are already 3 stop lights in that short distance. That stretch cannot handle more stop lights.

I spoke at the city council meeting several years ago and had pictures of the traffic every morning and evening for 5 straight days. Cars were backed up at all times.

I urge you to witness it for yourself and think about how it negatively effects the quality of life of those sitting in that traffic. Adding more stoplights for the Rancho Santiago project is not the answer.

Roundabouts should be considered and limiting the number of residences built in Rancho Santiago would help.

I ask that you help preserve our country community.

Ken Kribel
OPA
Good morning Richard,
As a home owner in Maybury Ranch I have many concerns about the proposed rezoning and development of the area known as Sully Miller.
Please respect and honor the OPA specific plan, do not increase housing density and preserve the character of our rural area.
As it stands it can take me 20 minutes to go from my house to the intersection of Cannon and Santiago Canyon road in the morning due to traffic and just the opposite trying to get home in the evening.
I believe the developer should they be allowed to build 25 more homes be responsible to do something to ease the traffic issues in this area.
It will be a shame and black eye on the city to allow this developer to change the country feeling of this area for profit. The reason I moved my family here was because of the feeling.
If you are forced by the developer to make changes Map E is the only plan that I could support depending on how many units are proposed. I expect our OPA Specific Plan and other historic planning documents for this site to be honored.
This will still add more traffic in the area that needs to be addressed.
Thank you,
Steve Ducolon
Lund-Iorio Inc
Phone 949-443-4855
Fax 949-443-4856
Cell 714-878-4579
6534 E. Smokey Ave
Orange Ca 92867
Hello, as a resident of the city of Orange, I would like to be on the record as opposing the Sully Miller development E or any other proposed development plans. It is my understanding that the developer purchased the land with the full knowledge that it is zoned as open space and is now and has in the past tried to develop it beyond what it is zoned. I would like to see that space remain as Open Space.

sincerely,

dawn robinette
1719 n shaffer st
Orange, CA 92865
Robert Garcia, Senior Planner,  
Planning Division, Community Development Department,  
City of Orange,  
300 East Chapman Avenue,  
Orange, CA. 92866

Re: Sully Miller NOP

Mr. Garcia,

Many of us walked out of the scoping meeting on March 16th wondering if we will be doing a referendum on the Trails of Santiago Creek project. It was impossible to figure out what the developer is planning.

One person told us there is no project, another one said Alternative A is the plan and a third said we got to pick the plan. The audience was irritated and many felt it was a waste of time. The only thing that stuck was the developer wanted 150 houses in an area where there are no zoning rights. That signals to us we have a fight on our hands.

The Notice of Preparation did not reference a plan and provided no details. I recently read in the paper where Newport Beach tried to hide key information about a big development on the coast and the State Supreme Court ruled against the city. It sounds like we might be going down that rough road.

Two projects have been defeated in the past. Our community is very interested in what happens on Sully Miller. We have fought many battles to protect our neighborhoods. The OPA Specific Plan is critical to maintaining our rural area and we expect it to be followed. Anything short of that will be rejected.

The developer inherited all the problems, obstacles, and liabilities by purchasing this property. None of those should be shifted to the city or taxpayers. This area is in a seismic flood plain that is prone to liquefaction and is right next door to the landfill. Why are we even considering building houses here? A full analysis of all these issues must to completed and available for the public to see.

Moreover, there is no right to build on 96 acres of this property. Please study each plan and verify this. Both the OPA and East Orange Plans designate those 96 acres as parkland. Only 12 acres is buildable and limited to less than 25 houses. Let’s stick to the plans that citizens and the city council agreed to so many years ago.
If the 25 houses are approved we expect the creek to be protected and the habitat areas restored using state of the art ideas and practices. Please provide that analysis.

This development will only add more traffic to a highly congested area that simply cannot be mitigated. Everything that came before and is planned in the future must be analyzed. Traffic in this area is an “F”.

The only plan that would be acceptable is Alternative E with 25 acres of residential and no more than 25 houses. Please keep us updated.

Bob and Katrina Kirkeby
Thank you for the extra work taken to present the ideas in a public meeting recently. It looks like a lot of work and possibly some compromising went in to the various ideas presented. I see that Mr Martin who I believe originally agreed to allow the ridding and exercise area to remain took it out of all proposals except one. That brings the question immediately of what else he might have hiding somewhere in his idea of the final disposition of the "Resource Area" and or "Organic Gardens & Community Activity Center" as noted on one plan. Does the "activity center" mean more cars coming and going on this very busy road?

RE: Plan "E":
1. The areas to the far eastern area has not identification of use so what is going to happen there?
2. The development of homes right against Santiago in not in the best interest of the new home owners. Right now the number of cars and on the weekends, motorcycles can be very noise. Who wants to own a $1 million home with this noise?
3. Assuming the entrance and exit is planned for Santiago that means an additional signal. Right not there are three light from Meads to the bottom of the hill and the back up of cars during travel times keeps cars backed up way up the hill approximately to the cemetery area. That is way over a thousand cars already waiting to get to Hewes and beyond. An additional signal will mean that is will be more difficult for the new home owners to come and go and needed. This is another negative to ownership.

RE: "E" recommendations
1. ref to #1 above- Get specifics now before to much is left as a general unknow agreement that can potentially cause many problems to current local residents and to the new home owners,
2. reg to #2 above- Move the home site development area back about 100 or more yards from Santiago and possibly more to either the western or eastern side of the current home development area. Leave this new space along Santiago open for natural vegetation and also allow the new home owners more privacy from the street autos and noise. This will cut the street noise some and also make the home sites more exclusive looking.
3. ref/#3 above- Have the current land owner give up enough land along Santiago going up the hill to allow a one car exit lane for home owners coming from the east to get out of the slow moving lanes that happen during the heavy driving times.
4. ref the general opening notes. We the home owners and the good people on the planning board know the past history of this owner and his cagy ways. It is imperative to have all details spelled out in detail and recorded about use and no use before any general agreement should be made.

Gary Wright
ussalesgw@cs.com
Hello Mr. Garcia,

I am writing in support of option E of the proposed plans for the Sully Miller site. The currently approved housing for the total site (25 homes) should be the maximum permitted. Consolidating the housing in one site should provide better traffic circulation and less disruption to the surrounding neighborhoods. This should be investigated in your studies.

Thanks you

Randall Hillman
640 E. Palmyra Avenue
Orange, CA 92866
714 639-5596
Hi Mr Garcia,

I am a homeowner in Orange Park Acres. I love my neighborhood and bought in this unique rural equestrian community to be away from the “city” in a place we could raise our children and animals. We are very active in our community and love to volunteer to make OPA the great place that it is. We bought in this area knowing that parks and protected space surrounded us, a place we could ride our horses and have an acre to be in the outdoor life we all enjoy.

Since buying in this area we have been flogged with developers attempting to come in and take over any undeveloped space and then go to extreme lengths to have land designation changed to fit their desires to build more. I am not into politics but I cannot understand how this makes sense when plans have been in place for many years and areas were developed to accommodate the infrastructure. Our last move was from Irvine so we definitely understand “master planning” a solid reason why we moved is that there are too many houses, too much traffic congestion, and overcrowding everywhere you look. At that is from a city that was master planned decades ago. We admired that Orange has been able to continue the legacy of protecting green spaces and not overdeveloping for the sake of a business deal.

I have traveled Santiago Canyon Rd for years taking my kids to school in the Villa Park area. I have seen how this road cannot handle any more traffic than it already has. The toll road made a huge impact on this road and our community when it was opened. There are days when I cannot get out of my street as people cut through Orange Park Blvd to avoid the traffic mess on Santiago Canyon and stack up waiting to turn onto Santiago Canyon. Cannon also backs up during commute time. I simply cannot image placing anything on this corner that brings in more traffic, especially during peak rush hour times.

I am also an equestrian rider. I believe active equestrians must be part of the process for any development in this area. Horses and traffic can co-exist but it must be talked through and well thought out. More traffic on an already busy arterial way where horse and rider already use is asking for disaster. We also draw a fair number of road and trail bicyclist to our area and this too is cause for concern with potentially bringing more traffic.

I know this parcel is an eye sore, I get it. I also believe this is in a flood plain and there is a methane field to boot. Not the most desirable place to build much of anything, let alone houses where humans will live their lives. But I do believe with more idea generation, the community, planners, and the developer can possibly come up with something that might work, BUT this is NOT the solution.

Regards,

Toni Bradley
20112 Hillside Drive, Orange
Dear Sir
I am animately against the development of Sully Miller that is other than the general plan permits!
Only Map E is acceptable plan to me and should be acceptable to the City members as well!
Please keep this map in mind for all future decisions! It is good for Orange Thank you Michelle Gregory

Sent from my iPhone
Dear Mr. Garcia:

I live in Orange Park Acres (20112 Hillside Drive) and have the following comments in response to the NOP for the purported project at the Sully-Miller site.

As a threshold matter, it is difficult to formulate a specific response, since there is no real "project" identified in the NOP. I believe this is a defect in the procedure that should render the NOP a nullity and the applicant should be required to submit a new NOP with the required level of detail.

In any event, to the extent a "project" is identified in the NOP, it has numerous problems.

Maps A-D all propose significant changes to the general plans and OPA specific plan in place on the site, without providing any valid reason for upending decades of wise planning. They propose to dramatically increase the density provided in these plans, as well as shift the locations of development to portions of the site that are not amenable to development. Only Map E appears to respect the historically planned number of acres to be developed (though the actual density is not shown on Map E).

Any development at this site will add stress to an already overstressed traffic load on Santiago Canyon Road. Anyone driving on this section of the road during either morning or afternoon rush hour (and often at other times as well) has suffered seemingly endless wait times through multiple signal-cycles at every intersection from Wanda to Jamboree.

Any development at the site must account for significant impacts to Santiago Creek, including the numerous plant and animal species that inhabit that area, as well as the site overall. The NOP is silent as to these impacts.

The NOP appears (though, as noted, details are scant to nonexistent) to propose residential development adjacent to the former landfill at the Cannon/Santiago Canyon intersection, which is currently a methane vent field.

In summary, the NOP suffers fatal procedural defects, and even the few details provided suffer numerous serious problems. I urge the city to reject the NOP and require a replacement that complies with the law and respects the city, county, and local planning documents.

Thank you.

Don Bradley.
As a resident of Maybury Ranch we are firmly against the development proposed known as the Trails at Santiago Creek.

Our major concerns are the impact the development will have on noise, traffic and wildlife. The traffic in our area now over the last 15 years we have lived there has gotten pretty unbearable. It is dangerous just to drive out of our housing tract onto Serrano at a controlled light. The commute time on Santiago and Cannon is very bad and has doubled our commute time to work over the last 5 years.

Please do not approve this development.

Sent from my iPad
Robert Garcia

From: victoria.coonradt@aol.com
Sent: Monday, April 3, 2017 3:52 PM
To: Robert Garcia
Subject: Sully Miller Site

Mr. Garcia,

I am a resident of the city of Orange living in Orange Park Acres. I have lived in Orange since the early 80's and OPA since 1997. As you know Orange is a city of diversity and residents who care about their city and its future. That is why I am addressing you on this issue and how the decision on how his site will be developed will impact our city. I was in attendance at the scoping meeting at Salem church. I like many other people in attendance was disturbed by the presentation and the lack of information and inability to answer questions regarding this project. I walked away from the meeting with a feeling of de ja vu having been involved in the Ridgeline fiasco. So here we go again. This same developer or investor or whatever you want to call it, is trying to get approval for a project that does not fit our community or abide by guidelines set forth by the OPA specific plan. Plans A through D as presented at the scoping meeting are absolutely unacceptable in my opinion and will create a negative impact on our community on many fronts. They didn't show anything that is compatible with the already established OPA specific plan. The only plan that seems acceptable is Plan E. The citizens of Orange and OPA specifically have worked tirelessly to preserve our city and community and we will continue to do so. Has this applicant not learned anything from past experiences? It's obvious they don't care about how they negatively affect our community or lifestyle. And so they are trying to come into our community and have their way again...unbelievable! You are the project manager and I hope that you have the city of Orange's best interest in mind not that of the applicant. Once again I reiterate, given what has been presented to this point, Plan E is the only viable plan as I see it. Thank you for your time.

Victoria Coonradt

Sent from my iPhone
Dear Mr. Garcia,

I am a Mabury Ranch resident living north of the proposed development on the former Sully-Miller site. I attended the scoping meeting last month hoping to get some details on this proposed development. You asked that we give you feedback on the choices given:

Alternative A - Opposed due to the size of the project, how it would affect the surrounding communities, and also too close to Santiago Creek. Building on the northeast corner (near Mabury Ave and Orange Park Blvd) would also affect the quietness of the dirt trail in our community that leads into the park. Mabury Ranch residents are not the only ones that use this path along Mabury Avenue. It is such a peaceful place to walk and enjoy the views to the south and to the west.

Alternative B - Same reason as above.

Alternative C - It is better choice than the prior two, but there would be too much proposed residential space. This would greatly impact traffic, noise, nature etc. We can hear Santiago Canyon Road traffic and the prior machine noise during the day when they were moving the dirt around on the site. The sound just travels up the hill.

Alternative D - Same as above, but too close to the homes on the east side.

Alternative E - Same as above, though better with less housing, but not interested in the Organic Gardens & Community Activity Center. This would only create more traffic and noise.

Alternative F - Opposed. Too, too close to Mabury Ranch and it would affect our community greatly.

Thank you,
Suzanne Kiel
5918 E Teton Ave
SuzanneLKiel@aol.com
Seems inevitable that the gravel pit and landfill land will be developed. But as a Mabury Ranch property owner, I do have concerns as they pertain to my investment and enjoyment of what I think is presently a very quiet and neighborhood.

Why is it that no specific project has been offered? Is the developer proposing single family homes or high rise buildings? Also, alternative F is not something I can support. Mabury Ave is a quiet residential street. F would turn it into a noisy, high traffic road to service the occupants of the way-to-many homes proposed. That would decrease the value of my home, and seriously degrade the environment. If the City of Orange determines that a development plan should move forward I would favor the plan that would pose the least amount of damage to the environment and offers the most potential for public benefit. That would be Plan E. But this plan offers very little in specifics and before I could endorse it many details would have to be defined.

Thank you for your attention.

Peter J. Masuck
6415 E Mabury Ave
Dear Mr. Garcia,

Thank you for the public meeting that you hosted and the opportunity to comment on this proposed project.

Map E represents the only acceptable proposal for this property. As you are aware the developer purchased this property with the existing zoning restrictions in place. The land has been used up, polluted, and its natural resources have been exploited. To consider any rezoning in favor of development is more than generous on the part of CPA and the City of Orange.

Best Regards,

Susan and James Philipp
Orange, CA
Robert Garcia

From: Carla French <tfrench@sbcglobal.net>
Sent: Monday, April 3, 2017 9:14 PM
To: Robert Garcia
Subject: RE: The request for comments regarding the NOP for the Trails at Santiago Creek project

Tom and Carla French
5905 E. Mabury Ave
Orange, Ca. 92867

April 3, 2017

Mr. Robert Garcia, Senior Planner
Planning Division, Community Development Department City of Orange
300 E. Chapman Ave.
Orange, CA 92866

RE: The request for comments regarding the NOP for the Trails at Santiago Creek project

After reviewing the information offered regarding this project we find the NOP (Notice of Project) to be lacking in the fact that no project has been offered. We found this was an opportunity to voice our opinion about six proposed project areas. However, not one proposal specified an identifiable project. Looking at the maps we were unable to determine if the applicant was proposing single family homes, high rise buildings or other types of use for the property.

That said, any development in this area will greatly and forever change this property. Currently, there are no lights and now there is very little activity on this property. There is an abundance of wildlife and vegetation that supports the wildlife. This property is in a flood plain zone that adjoins a methane gas field. The city denied it's use for a dog park, and yet they are considering placing houses in this area! Really? Development of any of the proposed plans will have negative and unmitigable consequences to this property and the surrounding communities.

Voter rejected the developer's previous plans for the property, despite his threatening letter to residents detailing his plans to make the site more active and with larger piles of dirt. Yet, none of the plans offered any idea as to the density the applicant is considering. This makes it very difficult to ask succinct and probing questions as to the environmental consequences of developing on any part of this property. It is essential that nearby residents, including Villa Park, and the City of Orange are provided a complete and comprehensive Environmental Impact Report, as required by the CEQA laws of the State of California. And that we are provided with detailed information as to the specific site plans.

As residents of Mabury Ranch, we are vehemently opposed to alternative F, the existing City of Orange General Plan. I have been opposed to this plan since the City of Orange changed this several years back. Here are a few of the reasons why I oppose this plan, and any development North of Santiago Creek:

1. Traffic associated with homes North of Santiago Creek would flow onto Mabury Ave. and Mt. McKinley Ave., streets that are already overburdened with pass through traffic caused by drivers trying to avoid the tremendous traffic issues on Serrano Ave. and Cannon St.. Currently vehicles exiting Mabury Ranch at peak driving times have to wait through three or more cycles of the traffic light at McKinley at Serrano. And this is with only 3 or 4 cars in que.
2. Traffic on Serrano, Cannon, Taft and Santiago Canyon Rd. is already at gridlock levels. Traveling at peak times is challenging at best. Tempers flare and there is constant honking as cars try to cut in line and find any advantage they can.
to get ahead of this traffic nightmare. The noise alone from honking, tire squeals and even some of the language I have heard from angry and frustrated drivers needs to be studied.

3. There have been numerous accidents at the intersection of Cannon & Serrano, and recently there was an overturned vehicle on Mabury Avenue.

4. Additional traffic in this area would pose an evacuation disaster should a wildfire or other event require a mass evacuation of Mabury Ranch. There is only one exit route from this area and that is through Serrano Ave. and Cannon St. If an evacuation occurred at a peak time lives would be in serious jeopardy. Evacuation is already seriously challenged by traffic and route limitations.

5. To build North of Santiago Creek would require the pads to be elevated so the building pads would be above the current street level. This would impact the views from the public multi-use trails, and those of Mabury Ranch in general has of the surrounding hillsides and ridgelines. This would completely eliminate the ridgeline views, even if single story homes were to be built. We understand there are regulations protecting ridgeline views.

6. There is currently a lack of storm water drainage along Mabury Ave. Even in light rains water extends several feet into the roadway. Adding any more runoff from elevated lots would only exacerbate this problem. This is a serious flood hazard and must be considered.

7. Rain and irrigation runoff drains into Santiago Creek. Adding additional pollutants from driveways and landscape fertilization and herbicides would add to the significant water quality issues in Santiago Creek, and inevitably into the ground water basins that provide much of the drinking water to East Orange.

8. Light pollution from the homes and street lights would have a tremendous impact in an area that is currently void of any such light. The ability to view the stars and other such nighttime displays would be compromised.

9. The impact to wildlife. Currently the area is inhabited by an incredible variety of animal life. From owls, frogs, coyotes, snakes, bobcat, deer and mountain lions it is home to all of them. This area is a rich resource and a migration corridor to surrounding natural areas. Any development would compromise this natural asset.

10. The impact to Santiago Creek from this, and previous operations on this property must be addressed. Santiago Creek is a tremendous resource for biodiversity, as well as, the enjoyment of the community. The area needs to be studied as to how best to restore the creek to a natural condition. This can provide habitat for wildlife and a place to escape the urban pressures we all face.

Our concerns regarding development in the areas South of Santiago Creek are as follows:

1. Any traffic generated from even the smallest project will have a big impact as the area is already in gridlock. Just adding one traffic signal would cause a disruption to traffic flow. In the morning as cars flow on to East bound Santiago Canyon Rd. a stoplight could impede the flow from Southbound Cannon. This would have a ripple effect: up Cannon effecting Taft, Serrano, Mt. McKinley, Yellowstone and Orange Park Blvd.

The flow of traffic in the afternoon peak period would also be impeded. A traffic signal, even without the additional cars would be slowed. The backup, already miles long, would be even greater as fewer cars could pass through the area in the same amount of time. Add to this the traffic from the planned developments to the East, this gridlock situation will be even further exacerbated. It can take over a half an hour to travel from Jamboree Road to turn onto Cannon and then turn onto Serrano to turn in to Mabury Ranch at Mt. McKinley. We would invite members of the planning commission to make this drive during peak times to see how greatly impacted our community already is by traffic.

2. The noise impact of the added traffic and stoplight would dramatically increase. Breaking and acceleration noises would be added to any area that does not currently experience it. The practice of the emergency service vehicles would change. Currently sirens are silenced when emergency vehicles are not approaching traffic or traffic signals. The added traffic and the addition of at least one traffic signal would change this practice. This noise impacts the entire area, Orange Park Acres, Mabury Ranch, The Reserve, The Colony, parts of Villa Park as well as Serrano Heights.

3. We feel any development of this site poses environmental challenges that are unmitigable. It should remain permanent open space after being returned to its natural condition. This includes Santiago Creek, whose course has been altered from its natural flow and degraded by misuse and abuse of this natural resource. This would comply with the Orange Park Acres Specific Plan, as well as, the Santiago Greenbelt Plan.

4. Finally, we have long been concerned about the health risks to our community since the gravel quarry closed and the site has been used to crush concrete. This was never the intended use for this property. And the current owner has
abused his trust by the residents. We view his proposals and their lack of specificity with great skepticism. We believe that the City of Orange should view his proposals with skepticism, as well.

The proposed Ridgeline Development ended at the Supreme Court, because this developer wanted to change the General Plan. Please do not allow this developer to change the General Plan to this site either.

We are opposed to any development of these sites.

Sincerely,

Tom and Carla French

Sent from my Pad
Robert Garcia,

I vehemently oppose building more homes on the acreage south of Maybury Avenue and north of Santiago Canyon Road. Serrano and Santiago Canyon Road are already over congested with traffic as it is. This also affects Cannon as well. There are times of the day when the traffic is backed all the way down Santiago to where people are trying to make the left at Cannon. Adding more homes will increase the traffic congestion, noise, and pollution to our lovely neighborhood.

I spent over a year searching for a home to purchase where my grandchildren could grow up. I was looking for an area that was safe, quiet and peaceful. I found that in Mabury Ranch. I enjoyed sitting on my front porch watching my grandchildren play ball and bike ride safely on their street. I also enjoy all of the walking trails and nature that surrounds this peaceful place. I am saddened to think that this unique neighborhood will be changed.

Joy Fletcher

Mabury Ranch homeowner

6209 East Bryce Ave.

Orange, 92867

(714) 538-3107

Acknowledgement of this would be appreciated
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN
ENVIRONMENTAL IMPACT REPORT

PLANING DIVISION RECEIVED
MAR 2 & 2017
CITY OF ORANGE

SCOPING MEETING
THURSDAY, MARCH 16, 2017

NAME / AFFILIATION: Barbara Nillman
MAILING ADDRESS: 4317 E. Fairhaven Ave, Orange, CA 92869

EMAIL:

Dear Mr. Garcia,

I have lived in Orange for 55 years. I have also followed the Sully Miller project proposals over the years. It's always amazes me what developers think they can get away with.

Since the early 1970's this property was slated to be open space and part of the Santiago Creek Greenbelt. The proposal of 150 homes for this site is totally inappropriate.

I do not support Map A and request that the city not allow the developer to break the rules that were set 45 years ago.

Any existing zoning to build houses should be limited to not more than 15 acres. There is absolutely no right to increase building area to 50 acres.

Keep it at 15 acres, let's stick to the plans.

At the scoping meeting only map E looked like it could be acceptable.
I agree with map E. that I saw at the Scoping meeting.

Please make sure that a connective Equestrian trail is in the proposal.

Please honor the OPA specific Plan.

Please make proper design and building within the zoning code a priority.

Thank you.
Dear Mr. Garcia,

The Sulby Miller property has been riddled with all kinds of issues. The community has rejected project after project. Those of us that have lived in Orange remember the 1968 floods. We also expect past planning agreements to be honored.

Sulby Miller, south of the creek is not zoned for residential housing. Map A is merely a revised version of Rio Santiago project. They switched out the senior housing for 150 single-family houses. This will never fly. I ask you to study the other failed projects and make the finding that this is DOA.
Robert Garcia, Senior Planner
Planning Division, Community Development Department
City of Orange
300 E Chapman Avenue
Orange, CA 92866
rgarcia@cityoforange.org

Mr. Garcia

I am LeRoy Pendray, living in Broadmoor Homes, and I have been a resident of OPA for 9 years. I truly enjoy being here and hopeful that the community will remain rural.

Thanks for having the scoping meeting last week at Salem. We were presented with several plans. You asked that we, the residents, give the City of Orange our feedback of the proposals. I am listing my thoughts in the order I feel is critical for your offices to consider.

Open space is critical in the overall Orange county populated area. I believe the project must consider this above all else. I believe plan E is the best suited for our area, which considers our rural lifestyle.

The Creek and the flood area is critical and must be reviewed by proper authorities.

The Specific Plan of OPA must be adhered to. One acre parcels.

Traffic is currently a disaster during the normal travel to and from work. Santiago Road, Chapman Ave, Cannon, and now Orange Park Boulevard created an unbearable situation. The project as submitted by the developer would put an additional 150+ homes resulting in approximately 300 cars, and 600 people, with just one street to enter and leave the project.

The project is yet to be identified thus the community does not know how the developer can possibly put 150 homes on 50 acres of land.

There were no provisions for Trails, nor equestrian facilities shown on any of the proposals.

The project is still located near an active methane field.

Thank you for your considerations.

LeRoy Pendray

3/27/17
Robert Garcia, Senior Planner
Planning Division, Community Development Department
City of Orange
300 E Chapman Avenue
Orange, CA 92866

Mr. Garcia

I am Frances Bauer, currently living in Broadmoor Homes, and I have been a resident of OPA for 47 years. I enjoy being here and hopefully the community will remain rural.

1. The Specific Plan of OPA must be adhered to, and that represents" One acre parcels".
2. Open space is critical in the overall Orange county populated area. I believe the project must consider this above all else. I believe plan E is the best suited for our area, which considers our rural lifestyle.
3. The Creek and the flood area is critical and must be reviewed by proper authorities.
4. Traffic during the normal commute hours, 7-9am / 3-6pm,is overwhelming on Santiago Road, Chapman Ave, Cannon, and now Orange Park Boulevard. It is now creating an unacceptable situation. The project as submitted by the developer would put an additional 150+ homes resulting in approximately 600 people and 300 cars using the same congested streets. The plan calls for just one street to enter and leave the project.
5. The project is yet to be identified thus the community does not know how the developer can possibly put 150 homes on 50 acres of Land.
6. There were no provisions for Trails, nor equestrian facilities shown on any of the proposals.
7. The project is still located near an active methane field.

Thank you for your considerations.

Frances Bauer
NOP letter

Following are comments for consideration in preparing the EIR for the scantily defined project at the current Sully-Miller site.

1. While a zoning change may well be justified by the depletion of earth resources removal, most of the site is already covered by one or more specific plans which specify allowable uses and number of housing units allowed. I believe the overall density of homes and limits on them should be honored by any new zoning.

2. When a previous development was proposed for this site, I recall much discussion of the hazards of flooding from potential failure of the Villa Park Dam. I believe concerns about this were one reason the plan was defeated. Flood hazard should be a significant area of study for this plan.

3. During that same earlier discussion, stability of the soil was another topic of concern. Much of the land either is siltation from the old creek or is fill from quarrying operation. These concerns must be addressed before allowing building of homes and infrastructure on the site.

4. This site is adjacent to or in the midst of a large community and regional trails system. Any project should support and enhance this trails system. First, the regional trail following the Santiago Creek course should be constructed. Next, adequate trails on the perimeter and through the planned community should be included. Any homes constructed in the project should have easy access to the wonderful trail system of Orange County.

5. This project is also adjacent to one of the most vibrant equestrian areas of the county. Any project should be rated by its support for, or inclusion of, equestrian facilities either on individual properties or in a central stable.

6. I believe we need more definition or terms such as “passive green area”. What activities would be allowed on this area? Would an equestrian arena be one of allowed uses?
April 2, 2017

Dear Robert,

We would like to thank you for hosting the March 16th public scoping meeting regarding the proposed development, the Trails at Santiago Creek.

As you know, Mabury Ranch borders the Northernmost portion of the former Sully-Miller site. That means many of our homeowners will be directly impacted by any development on this property. One aspect we support is that none of the maps A thru D include building north of Santiago Creek. While we understand current zoning allows building in this area, we also know that proximity to the creek would be troublesome and costly. We favor moving this area zoned for homes to another area of the site, closer to Santiago Canyon Road, where it would be more feasible for a builder to build.

The Mabury Ranch Homeowners Association opposes the applicant’s maps “A, B, C & D” that would change the existing zoning to accommodate up to 150 homes. We support the applicant’s map “E” (only 25 homes, south of the creek.)

Here are some of the reasons why we oppose more development:

1) Traffic – Access to Serrano and Cannon is already restricted during rush hour
   - Currently our homeowners sit through multiple light signal cycles because traffic backs up along Serrano. Increased traffic coming from Santiago Canyon Road will mean longer wait times at the 3 Serrano entrances to our community. The upcoming 1,200-home Irvine Company development will compound this problem.

2) The Santiago Creek – flood mitigation and habitat preservation
   - We want to know how what steps will be taken to mitigate the dangers caused by potential flooding of Santiago Creek. We also want to know how the applicant plans to restore the creek to its natural state, free of debris so that natural habitats are preserved.

3) Access to Santiago Oaks Regional Park – Trail connectivity & parking
   - Some hikers that access Santiago Oaks Regional Park leave their cars along Mabury Avenue. If the plan calls for the trails to connect at Cannon, we are concerned about the impact of added parked cars along Mabury Ave.

4) Views – The impact of raising elevations
   - We understand that building on this site will require raising the elevation which will negatively impact our homeowners’ views of the surrounding hillsides and ridgelines. Allowing 2-story homes to be built on this site will compound this problem.

We look forward to seeing the EIR and continuing working with the City and applicant’s representative to come up with a plan we can all support.

Thank you,

Dick Hollinger, President
Mabury Ranch Homeowners Association
To: Robert Garcia, Senior Planner, City of Orange  
From: Martha Wetzel, Orange resident  
Re: Comments on NOP for Milan’s Sully Miller Development Plans  
Date: April 3. 2017

Thank you for the opportunity to comment on the latest NOP for the Sully Miller site plans presented by the Milan Corp.

Since this parcel is intimately associated with Orange Park Acres, it is imperative that it “fits” with the current zoning and uses in and around its perimeter. The OPA Specific and East Orange Specific Plans must be followed to preserve the integrity of this area. I feel that the applicant’s plan to put up to 150 homes on 50 acres is not in keeping with the established residential density. At this point we have no details on specific designs or inclusions (or exclusions): hence it is most important that the city consider the surrounding uses, traffic patterns and ambiance while studying this project.

Every effort should be made to mitigate the effect of even more traffic on Santiago Canyon Road which is already a nightmare at Cannon most of the day, in all directions. Having only one entrance into the development will produce more waits, presumably at a traffic signal, which will increase auto emissions and interfere with traffic flow. It will force traffic onto OPA Boulevard, which is a RURAL street within an established equestrian area and increase the likelihood of accidents for trail users. OPA was established as an equestrian community and it must remain a safe, well-planned area with as little vehicular traffic as possible, ideally local in nature.

I also believe that multiuse (nonpaved) trails must be developed within and at the perimeter of this project to connect with existing City, OPA and County of Orange trails. We have the best trail system in the area and every developer nearby should be required to make trail connections and design the trails in accordance with the standards in the area. A major selling point for this development should be its proximity to Regional Parks and local and regional trails. I see very little in this regard in Exhibit A, Milan’s map.

I believe asbestos and silica are ingredients in concrete and I would like to see a discussion of how removal of tons of concrete and other debris will be mitigated in any development of this site. Simply listing a response to this request as “deemed negative declaration” would be absolutely unacceptable.

Thank you again for the opportunity to comment on this project.

Martha Wetzel  714-289-8205  7217 E La Cumbre Drive Orange, CA 92869
April 3, 2017

Robert Garcia, Senior Planner  
Planning Division, Community Development Department  
City of Orange  
300 E. Chapman Ave.  
Orange, Ca. 92866

RE: NOP Sully Miller Property Project

Dear Mr. Garcia,

I am responding with my comments and concerns regarding the proposed project. Concept maps A, B, C, and D presented are lacking and do not meet neighborhood compatibility.

- Lot Size  
- Equestrian Overlay - Animal Keeping  
- Traffic  
- Flood  
- Public Safety
1. Does not comply with the Orange Park Acres Specific Plan of 1 Acre minimum.

2. Does not comply with the recorded Equestrian Overlay for animal keeping. The Orange Park Acres Equestrian Community has a 20+mile multi use trail system connecting to regional parks for the purpose of hiking, biking and horseback riding. The proposed project does not entice Orange homeownership for those recreational users.

3. The current traffic on Santiago Canyon road has been increasing. Currently, the traffic traveling to and from Imperial/Cannon to Jamboree/241/261 is backed up every day along the Sully Miller property. More cars are cutting through residential streets to avoid the traffic delays.

4. The Planning Commission voted unanimously to not ratify the Rio Santiago EIR high density project presented by this same developer. There were 8 major issues in the EIR. The City Council upheld and approved the Planning Commission’s decision. This proposed project may not be the magnitude of housing, but still suggests 150 homes. Which resident of those 150 homes will be sent on an unscheduled trip to the ocean? Also, the City Council rescinded their vote on The Fieldstone project with 187 homes as a result of strong community opposition.

5. Public safety for the proposed number of residents increases, fire, police and other services.
Map E has opportunity to be compatible in the area. I would suggest considering an equestrian center to add recreational use. Those who live in the Equestrian Overlay area, may not have large enough lots for animal keeping, but would consider boarding a horse in a facility with immediate access to this vast multi use trail system. Resulting in additional revenues to the City of Orange from the Equestrian Center and existing local businesses, feed stores, farrier and veterinarian services while shopping Orange! Plus, adding to the City of Orange’s diverse ability to live, work and play in Orange.

Thank you for your consideration.

Sincerely,

Laura Thomas
35 year Resident
Realtor
Past President of Orange Park Association
April 3, 2017

Robert Garcia  
Senior Planner  
Planning Department  
City of Orange  
300 East Chapman Avenue  
Orange, CA 92866

Re: Liaison Committee (Orange Park Acres, Mabury Ranch and The Reserve)  
response to the NOP for The Trails at Santiago Creek proposal

Dear Robert,

As representatives of the Liaison Committee appointed by the Orange City Council please accept our general comments to the Notice of Preparation. We represent Mabury Ranch, Orange Park Acres and The Reserve. Each of our communities has sent separate letters with specific concerns about this project. This letter is not meant to be comprehensive but rather an overview of our unified perspective as we move forward with this process.

The Liaison Committee has been working together to find consensus for an acceptable project for the Sully Miller site. As you know this is the third time in 18 years that a project has been proposed for the Sully Miller site. Both Fieldstone (2003) and Rio Santiago (2014) were rejected for good reasons.

Our committee members have been engaged in the planning process of Sully Miller over the years. We have institutional knowledge of this site and understand the restrictions, limitations, community expectations and what they will tolerate on this site.

As a committee, we have provided input on what would be acceptable based on constraints of the site, past proposals, planning law and the various plans that govern this site. The constraints, restrictions and challenges of this property are enormous.

Some of the issues that must be independently analyzed include the various plans on the site, allowed density, the creek, habitat restoration, flooding issues, methane on the adjacent landfill, liquefaction, lighting, flood issues relating to the dam inundation zone, view shed, traffic, safety and circulation issues. There are many more issues.
We respect the developer’s property rights to develop in the area that is designated residential but also expect the historic planning documents for the site to be honored. Past proposals have allowed for 13 to 25 houses on the acreage north of the creek and six homes on the seven-acre arena site south of Santiago Canyon Road that are both currently zoned residential (Map F Existing City of Orange General Plan).

We understand having contiguous open space north of the creek could be a cost saver for the developer and as such believe siting those development rights closer to the highway and away from the flood zone is logical. We appreciate Orange Park Acres’ willingness to entertain moving those rights to their planning area provided that the elements of the OPA Specific Plan are adhered to. We also understand that moving the six homes from the 7-acre site and leaving the horse arena is a benefit to OPA.

At the March 16th scoping meeting the audience was asked to identify the alternative they favored. Although it lacked any specifics, without a doubt Map E is a plan that our committee could support provided that the density proposed complies with the OPA Specific Plan.

We are pleased to share our knowledge and to have the opportunity to serve our community. Our top priorities will continue to be traffic and circulation, safety, trails, protecting Santiago Creek, restoring the habitat, density, respecting historic plans including the OPA Plan and preserving the character of the rural area. Our committee will continue to work in good faith in order to find a plan that hopefully we will be able to support.

Thank you,
City of Orange Sully Miller Liaison Committee

Orange Park Acres
Tom Davidson
Theresa Sears

Mabury Ranch
Nick Lall
Stephanie Lesinski

The Reserve
Addison Adams
Dan Martin
Tom Davidson  
6122 E. Santiago Canyon Road  
Orange, CA 92869  

Mr. Robert Garcia, Senior Planner  
Planning Division, Community Development Department  
City of Orange  
300 E. Chapman Ave.  
Orange, CA 92866  

April 3, 2017  

RE: NOP comments for The Trails at Santiago Creek Project  

Dear Mr. Garcia  

Please find my comments below addressing the issues I have with The Trails at Santiago Creek project (project).  
1- Map “E” is the only map that could be acceptable.  
2- Map “A” with 150 Homes is too many homes for this site.  
3- Map “A” would generate too many car trips to an already overcrowded road NO MATTER which direction the car trips were taken.  
4- There are existing documents that have been adopted by the city and the county that call for this to be open space, namely the OPA Specific Plan and the Santiago Greenbelt Plan.  
5- Map “A” and 150 homes would be completely out of character with the surrounding neighborhoods.  
6- This developer purchased this land with NO contingencies knowing full well, if they had done their due diligence, that most of the “buildable” land was in the Orange Park Acres Sphere of Influence and that calls for 1 acre minimum size lots.  
7- All building must be done with a large buffer zone between Santiago Creek, Santiago Canyon Road and the homes so that trails can be incorporated into the project.  
8- Trails must connect to the perimeter on the north, south, east and west sides of this project as well as along the Santiago Creek.  
9- OPA must be consulted on all trail matters.  

Finally, this project site represents one of the last large pieces of land in the City of Orange. There are few, if any, areas in Orange where a creek, like Santiago Creek, with so much potential for habitat, education, and passive open space is open for development. Our government, a government by the people and for the people, should realize an opportunity exists to satisfy so many needs on so many levels- as follows:  
- OCWD could use parts of this property for ground water replenishment.  
- OC Public Works could use the creek as protection from the two upstream dams and for dam inundation.  
- OC Parks could use this land for an extension of Santiago Oaks Park.
-The City of Orange could have one of the best inland ecological preserves for plant and animal habit and incorporate that with local schools and universities as an educational opportunity.
- The county landfill site could be used for parking and insure that methane gas infiltration does not harm residents (which could potentially happen if new homes were built nearby).

If these government agencies and schools were to form an alliance and come together using their collective abilities, a project could be developed that would satisfy the developer and ensure one of the most beautiful stretches of land in Orange is preserved for all the generations that are to follow us.

Thank you for your time. May we hope and work hard toward seeing a project that we ALL can be proud of.

Sincerely,

[Signature]

Tom Davidson
RE: The request for comments regarding the NOP for the Trails at Santiago Creek project

After reviewing the information offered regarding this project I find the NOP to be lacking in the fact that no project has been offered. All that I found was an opportunity to voice my opinion about six proposed project areas. Not one specified an identifiable project. Looking at the maps I could not tell if the applicant was proposing single family homes or high rise buildings.

That said, any development in this area will greatly and forever change this property. Currently there are no lights and very little activity on this property. There is an abundance of wildlife and vegetation that supports the wildlife. Therefore any development of any of the proposed plans will have negative and unmitigable consequences to this property and the surrounding communities. Currently I have a peaceful enjoyment of my property and that is threatened by any and all of the proposed development areas.

As a member of the working group comprised of Orange Park Acres, The Reserve, Mabury Ranch and representatives of the property owner I do understand that the applicants stated intentions are to build single family homes on one of the proposed planning areas. But none of the plans offers any idea as to the density the applicant is considering. This makes it very difficult to ask succinct and probing questions as to the environmental consequences of developing on any part of this property. I feel very much compromised in what I am being asked of, to provide the questions I need answered to feel the
City of Orange is being provided a complete and comprehensive Environmental Impact Report as required by the CEQA laws of the State of California.

In an effort to provide you with my concerns with the limitations stated previously I offer the following comments.

As a resident of Mabury Ranch I am vehemently opposed to alternative F, the existing City of Orange General Plan. I have been opposed to this plan since the City of Orange changed this several years back. Here are a few of the reasons why I oppose this plan and any development North of Santiago Creek.

1. Traffic associated with homes North of Santiago Creek would flow onto Mabury Ave. and Mt. McKinley Ave., streets that are already overburdened with pass through traffic caused by drivers trying to avoid the tremendous traffic issues on Serrano Ave. and Cannon St.. Currently vehicles exiting Mabury Ranch at peak driving times have to wait through three or more cycles of the traffic light at McKinley at Serrano. And this is with only 3 or 4 cars in que.

2. Traffic on Serrano, Cannon, Taft and Santiago Canyon Rd. is already at gridlock levels. Traveling at peak times is challenging at best. Tempers flare and there is constant honking as cars try to cut in line and find any advantage they can to get ahead of this traffic nightmare. The noise alone from honking, tire squeals and even some of the language I have heard from angry and frustrated drivers needs to be studied.

3. Additional traffic in this area would pose an evacuation disaster should a wildfire or other event require a mass evacuation of Mabury Ranch. There is only one exit route from this area and that is through Serrano Ave. and Cannon St.. If an evacuation occurred at a peak time lives would be in serious jeopardy. Evacuation is already seriously challenged by traffic and route limitations.

4. To build North of Santiago Creek would require the pads to be elevated so the building pads would be above the current street level. This would impact the views from the public multi-use trails and that Mabury Ranch in general has of the surrounding hillsides and ridgelines. This would completely eliminate the ridgeline views, even if single story homes were to be built. I understand there are regulations protecting ridgeline views.

5. There is currently a lack of storm water drainage along Mabury Ave. Even in light rains water extends several feet into the roadway. Adding any more runoff from elevated lots would only exacerbate this problem. The hardscape and basically concreting over open space adds a tremendous amount of runoff from its current state. This is a serious flooding hazard and must be considered.

6. Rain and irrigation runoff drains into Santiago creek. Adding additional pollutants from driveways and landscape fertilization and herbicides would add to the significant water quality issues in Santiago creek and inevitably into the ground water basins that provide much of the drinking water to East Orange.
7. Light pollution from the homes and street lights would have a tremendous impact in an area that is currently void of any such light. The ability to view the stars and other such nighttime displays would be compromised.

8. The impact to wildlife. Currently the area is inhabited by an incredible variety of animal life. From owls, frogs, coyotes, snakes, bobcat, deer and mountain lions it is home to all of them. This area is a rich resource and a migration corridor to surrounding natural areas. Any development would compromise this natural asset.

9. The impact to Santiago Creek from this and previous operations on this property must be addressed. Santiago Creek is a tremendous resource for biodiversity as well as the enjoyment of the community. The area needs to be studied as to how best to restore the creek to a natural condition. This can provide habitat for wildlife and a place to escape the urban pressures we all face.

Many of these issues pertain to any of the plans offered so I won't repeat them as I address the other alternatives. But in addition to the issues above, building on the areas South of Santiago Creek is challenging at best.

Any traffic generated from even the smallest project will have a big impact as the area is already in gridlock. Just adding one traffic signal would cause a disruption to traffic flow. In the morning as cars flow on to East bound Santiago Canyon Rd. a stoplight could impede the flow from Southbound Cannon. This would have a ripple effect up Cannon effecting Taft, Serrano, Mt. McKinley, Yellowstone and Orange Park Blvd.

The flow of traffic in the afternoon peak period would also be impeded. A traffic signal, even without the additional cars would be slowed. The backup, already miles long, would be even greater as fewer cars could pass through the area in the same amount of time. Add to this the traffic from the planned developments to the East, this gridlock situation will be even further exacerbated.

The noise impact of the added traffic and stoplight would dramatically increase. Breaking and acceleration noises would be added to any area that does not currently experience it. The practice of the emergency service vehicles would change. Currently sirens are silenced when emergency vehicles are not approaching traffic or traffic signals. The added traffic and the addition of at least one traffic signal would change this practice. This noise impacts the entire area, Orange Park Acres, Mabury Ranch, The Reserve, The Colony, parts of Villa Park as well as Serrano Heights.

I feel any development of this site poses environmental challenges that are unmitigable. It should remain permanent open space after being returned to its natural condition. This includes Santiago Creek whose course has been altered from its natural flow and degraded by misuse and abuse of this natural resource. This would comply with the Orange Park Acres Specific Plan as well as the Santiago Greenbelt Plan.
If the City of Orange determines that a development plan should move forward I would look to the plan that would pose the least amount of damage to the environment and offers the most potential for public benefit. That would be Plan E. But this plan offers very little in specifics and before I could endorse it many details would have to be defined. As a member of the Working Group and the Liaison Committee I will work hard to assist the applicant in defining these details. I want to ensure that it is a project that I and future generations can live with.
April 3, 2017

Robert Garcia
Senior Planner
City of Orange
300 East Chapman Avenue
Orange, CA 92866

Re: Sully Miller site - Notice of Preparation for a Draft Environmental Impact Report for Trails at Santiago Creek proposal

Dear Mr. Garcia,

I have been involved in the Sully Miller site since 1999 when Fieldstone filed their Notice of Preparation (NOP) and again in 2009 when the Rio Santiago NOP was filed. I have actively participated in the entire process for both proposals and have a good understanding why each project was rejected. I have also been involved in my community and have a great appreciation for the City of Orange, Orange Park Acres, its unique character and the reason it has thrived for 90 years.

There is an opportunity to finally resolve what can and cannot be built on the Sully Miller site. Most developers have minimized and misunderstood the constraints of this property and instead focused solely on getting entitlements just to turn a huge profit. They have often relied on Statements of Overriding Considerations to get approvals, which are sweetheart deals for the developers, and impacts that are unmitigatable for the community to later deal with.

The Sully Miller Company achieved the highest and best use of this property years ago through their sand and gravel operation. It is now time to recognize the constraints and plan from that point of view with the creek as the starting point. A small portion of the site does allow for houses with the balance of the property designated as open space. The community has an expectation that their plans, which have served them well, will be respected.
I appreciate the opportunity to comment on the Notice of Preparation ("NOP") for the Draft Environmental Impact Report ("DEIR") for the Trails at Santiago Creek proposal. It should be noted that it is impossible to understand the true scope of the proposal without an Initial Study or a defined project.

Regardless, I would like to submit general comments. Please include this letter in the official record of proceedings for the project and include me in any future notifications related to the Trails at Santiago Creek proposal.

PROJECT DESCRIPTION

The very limited NOP leaves numerous questions concerning key aspects of the project. The NOP refers to a Major Site Plan (MSP) Review. No MSP has been provided. The NOP refers to a Design Review Committee (DRC) consideration. No plan has been provided for the DRC to review.

A MSP needs to address the conceptual design of Santiago Creek, its alignment, width, depth, proposed vegetation, bottom configuration, etc. to address flood control considerations, aesthetic considerations, trail design, how it interacts with water quality management (WQMP) design, and freeboard protection. What will be the creek edge treatment? Will it be natural?

If the "worst case" plan of 150 homes on 50 acres is to be studied, as part of the CEQA scoping analysis a conceptual plan must be available. When will it be provided? A plan is needed to see how that would integrate into the surrounding area and community. Are these single-family homes? Will they be single story? Will they be clustered or sitting on 5,000 sf lots? What is the relationship to the street and the creek? How would the circulation work and where is the ingress and egress point(s)? What are the proposed new peak hour trips? The character of the proposed project and interaction with the creek element and surrounding neighborhood must be described.

Without a clear description of the project it is impossible to know the probable environmental effects. More details are needed to adequately address key issues. I would suggest that the NOP be amended and re-circulated when a project is selected.
AESTHETICS

Alternative A suggests a 150-unit housing tract. Would this housing project require an exception (variance) to the policies and regulations in the General Plan, Planning Code, Uniform Building Code, Orange Park Acres Specific Plan, and East Orange General Plan? Would the exceptions cause a fundamental conflict with policies and regulations in the General Plan, Planning Code, Uniform Building Code, Orange Park Acres Specific Plan or East Orange General Plan addressing the provision of adequate light related to appropriate uses? Will this project require streetlights, outdoor security lights or other lighting that will affect the natural rural ambience? Impacts of light and glare on wildlife in the area must be analyzed. A thorough analysis to the visual and aesthetic impacts must be completed. This should include use of photomontages or visual simulations to illustrate the change in character of the project site before and after project implementation.

AIR QUALITY

Would the project result in a substantial increase in diesel emissions? What would be the impacts of the mass grading to surrounding neighborhoods? Would the long-term emissions associated with the vehicle trips and energy consumption created by this project result in the production of excessive air pollutants? What is the AB 32 (Global Warming Act) compliance plan? A qualified, independent expert should prepare a detailed analysis of potentially significant air quality impacts.

ALTERNATIVES

This property is currently zoned resource/sand and gravel with 12.6 acres zoned R-1-8. An extensive range of alternative plans for this property must be considered. This would include but not be limited to (1) "no-build" alternative; (2) building only on residentially zoned land as once intended in 1993 and leaving the rest as open space; (3) Alternatives B, C, and D are relatively the same and should be analyzed as such; (4) Alternative E that would allow for 25 homes on 25 acres with the balance open space or agricultural; and (5) a "mitigated alternative" that addresses all potentially significant impacts and is based on composite constraints map of the site. This could be done by an independent "urban design team".
AGRICULTURAL RESOURCES

Portions of this site have been used for agricultural production in the past. It is a logical location for growing due to its proximity to a water source. An analysis should be made as to whether reintroducing food production might serve as a good use and important resource especially as we watch the major changes and shifts in our world. Food is a high priority.

BIOLOGICAL RESOURCES

In 2008, the applicant destroyed several acres of trees and habitat on this project site. This destruction may have interfered with native resident or migratory fish or wildlife species. These actions have reduced confidence that the developer will honestly comply with Federal and State environmental regulations. In addition the City of Orange, County of Orange and various agencies have signed on to the Habitat Conservation Plan and Natural Community Conservation Plan. Would this habitat destruction be in violation of the HCP/NCCP regional conservation agreements? Would the project protect biological resources, including the wetland and riparian habitats? There are several threatened or endangered species, gnatcatcher, the Least Bell's Vireo and the Southwest Pond Turtles on this site. Would there be substantial degradation to their riparian and aquatic habitat through discharging a substantial amount of pollutants into a creek; significantly modifying the natural flow of the water; depositing substantial amounts of new material into a creek or causing substantial bank erosion or instability; or adversely impacting the riparian corridor by significantly altering vegetation or wildlife habitat; changing of the land forms; impacts because of grading? Independent biologists and hydrologists should analyze impacts to water quality, development and site alterations on species, all subject to peer review. All agency approvals and permits, U.S. Fish and Wildlife Service, Department of Fish and Game and the U.S. Army Corp of Engineers, must be obtained prior to any local approvals.

What is the plan for the restoration of the original topography and vegetation? The creek has been diverted and should be restored to its natural route. How will this be achieved?
CULTURAL RESOURCES

Delineate the plan that would be used in the event site grading would uncover human remains, artifacts or paleontological resources. How would they be protected?

CUMULATIVE ANALYSIS

The DEIR must analyze the cumulative impacts of this project and other related past, present and probable future projects. Cumulative impacts for ALL environmental factors must be included. The DEIR must also analyze the noise impacts on species and the loss of anticipated open space in the area.

GEOLOGY AND SOILS

Would the project result in substantial soil erosion or the loss of topsoil, creating substantial risk to the creek? This project is located in a dam inundation zone. Would the unstable soil conditions cause further liquefaction, landslides and/or soils problems that could be a risk to life or property? Identify the fill areas and the areas where silt has been dumped. What is the remediation plan? Define the plan for this site that will legally comply with the Surface Mining and Reclamation Act (SMARA) and all associated regulations.

HAZARDS AND HAZARDOUS MATERIALS

The project is located adjacent to the former Villa Park Landfill. Site excavation could result in the releasing of methane and other hazardous gases. In addition this site may contain hazardous materials that could create serious problems for the environment and the public. This property is also located in a dam inundation zone 1.25 miles from the Villa Park Dam, an earthen dam. A thorough analysis must be completed delineating the potential impacts; dam failure and potential liability the City may have due to inundation and landfill gases.

HYDROLOGY AND WATER QUALITY

Would the project create or contribute substantial runoff, which would be an additional source of polluted runoff? Would the project substantially alter the
existing drainage pattern of the site or area, including through the alteration of the course, or increasing the rate or amount of flow of the creek in a manner that would result in substantial erosion, siltation, or flooding, either on or off-site? Would the project have a negative impact on underground water quality? All issues relating to flood hazards and dam inundation must be analyzed.

LAND USE/PLANNING

This project must not conflict with three long standing land use plans all adopted by the City of Orange: the Orange Park Acres Specific Plan, Santa Ana River/Santiago Creek Greenbelt Plan and the East Orange General Plan. Committees representing homeowners, major landowners, developers, and City and County governments carefully conceived all of these plans. Both the OPA and the East Orange Plans designate nearly 96 acres as open space. How does this project propose to honor each of these plans?

How have the conflicts between prior planning documents and actual acreage for existing open space and the R-1 zoned area north of the creek been resolved?

Would the 150 units require a zone change? How is a 150 residential housing tract justified in a designated open space area? How could you justify amending the general plan and zoning maps to accommodate this housing tract? How would you justify amending each of the other plans to accommodate this tract? What is the long-term habitat land management plan for the natural open space area?

NOISE

This project will result in short-term and permanent increase in ambient noise levels. Short term because of the construction, long term due to the 150-unit housing tract and increased traffic. Noise impacts on species must be analyzed; a noise study should be prepared to examine all the potential noise impacts. The applicant should retain experts to peer review all technical reports submitted for the DEIR.

RECREATION

A 150-unit housing tract will increase the use of regional parks in the area. A detailed analysis of the impacts to the environment must be included.
TRANSPORTATION/CIRCULATION

A traffic analysis must include the evaluation of the impacts of the construction phase including the cumulative projects in the area and an analysis of the permanent proposed project. This would include resident, visitor, services, recreational users, emergency and any others that might frequent this development. In addition facilities supporting alternative transportation must be considered: bus turnouts, bike trails and racks, horse crossings, staging areas, hitching posts, bus parking, RV parking, overflow parking, emergency ground vehicle access and an emergency helicopter landing the event of a road closure or emergency. Air traffic patterns would need to be considered and any related safety risks. Cumulative impacts of existing traffic must be analyzed. A backup plan must be designed in the event that Santiago Canyon Road is not accessible due to historical closures because of fires, power outages and fatal accidents in the area.

UTILITIES AND SERVICE SYSTEMS

Would the project violate applicable federal, state and local statutes and regulations relating to energy and water/sewer service system standards? Would the project result in a determination by the energy and or water/sewer provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the providers' existing commitments and require or result in construction of new energy and/or water/sewer facilities or expansion of existing facilities, construction of which could cause significant environmental effects? What Urban Water Management Plan does this project rely on and is it adequate? What are the impacts of wastewater and storm water?

CONCLUDING COMMENTS

Changing the zoning of Sully Miller is a serious matter. Developers thus far have driven the discussion and generally ignored informed residents. They have missed the opportunity to turn this site into a positive but the first step to success is to recognize the limitations of this site, dial back greed and listen to the community.
Any project must be consistent with the city-adopted OPA Specific Plan and the East Orange General Plan calling for Open Space or Recreational/Open Space zoning. Of the alternatives provided the only plan that comes close to this criteria is Map E – 25 homes on 25 acres with a contiguous greenway north of the creek. Map A with 150 homes on 50 acres is going in the wrong direction and unachievable.

The City of Orange states that the goal is to “better define its image and position within the region, maintain and reinforce existing neighborhood values, address local and regional environmental issues, and provide a better quality of life for the citizens of Orange.” Let us hope past lessons will be learned and history will not repeat itself.

I appreciate the opportunity to comment on this NOP. I welcome any questions and stand ready to help turn this into a positive.

Sincerely,

Theresa Sears
April 3, 2017

Robert Garcia, Senior Planner
City of Orange
300 East Chapman Avenue
Orange, California 92866
rgarcia@cityoforange.org

Re: Notice of Preparation of a Draft Environmental Impact Report for The Trails at Santiago Creek Project

Dear Mr. Garcia:

We represent Orange Park Association ("OPA") in connection with The Trails at Santiago Creek Project ("project"). Like all concerned members of the public, OPA expects to rely heavily on the environmental document required by the California Environmental Quality Act ("CEQA") for an honest and thorough assessment of the environmental impacts of the proposed project. To this end, we submit the following comments on the City’s Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the proposed project.

I. Introduction

Planning for the project site is of the utmost importance as it represents one of the last pieces of large undeveloped land in the City. The community has long considered the site a priority for open space protection because it includes access points to Santiago Creek and existing and planned trails associated with the Orange Park Acres trail network and the County regional trail system. The site is also important ecologically as it contains riparian habitats and wetlands, habitat for numerous sensitive wildlife species, and its proximity to Santiago Oaks Regional Park.

Over the years, the project site has been the subject of various controversial development proposals. In each instance, the proposals called for too much development with insufficient regard to the community’s rich historic heritage, its open space and
recreational needs, and the site’s ecological values. OPA has actively participated in the City’s processing of each of the prior development applications and has consistently articulated its well-founded concerns that development on the site must be environmentally sensitive and must preserve the character of the surrounding community.

OPA appreciates the recent efforts the applicant has made to coordinate with the community to better understand its priorities for development of the site. As part of this community outreach, the City and the applicant have entered into a Pre-Development Agreement that, according to the NOP, provides project development alternatives that are intended to guide the processing of the various land use approvals required for the project. Based on our review of these development alternatives, the City appears to be at the “pre-planning” phase of project development, i.e., the project has not yet been designed.

We question the value of releasing an NOP prior to the applicant identifying a specific project. Regardless, the comments that follow are based on the scant information that has been provided and are based on the environmental checklist form contained in the CEQA Guidelines, Appendix G.

II. The NOP Lacks Necessary Information Regarding the Project and its Probable Environmental Impacts.

The purpose of an NOP is to “solicit guidance from members of the public agencies as to the scope and content of the environmental information to be included in the EIR.” CEQA Guidelines § 15375; see also CEQA Guidelines § 15082. In order to effectively solicit such guidance, the NOP must provide adequate and reliable information regarding the nature of the Project and its probable environmental impacts. Unfortunately, the City’s NOP does not meet the minimum standard for adequacy in this regard. We respectfully request that the City revise and recirculate its NOP in order to remedy this serious problem.

A. Project Description and Setting Information

One of CEQA’s fundamental requirements is that an EIR contain an accurate and complete project description. See County of Inyo v. City of Los Angeles, 71 Cal.App.3d 185 (1977); see also CEQA Guidelines § 15124. A clear and comprehensive project description is the sine qua non for meaningful public review. Without it, the public cannot be assured that the environmental impacts of the entire project have been considered in the EIR.
It stands to reason therefore, that to be adequate, an NOP must describe the proposed project in sufficient detail to enable agencies and the public to prepare a meaningful response to the NOP. CEQA Guidelines § 15082(a)(1)(A) & (B). Unfortunately, the City’s NOP fails to meet this basic standard. In fact, although the NOP requests that the public provide its views and specific concerns about the environmental effects of “the project,” neither the City nor the applicant have set forth a specific development plan. Instead, the NOP includes a series of figures each of which show an alternative land use schematic for the site. The only written description in the NOP of the “project components” is a statement that the EIR will conduct a “worst case” analysis which would be the development of 150 homes on 50 acres of the 109-acre site with the remaining 59 acres preserved in natural greenways and open space (hereinafter “Alternative A”). NOP at 5. It is unclear from this vague statement what specifically the applicant contemplates for the site, or if the applicant even has a broad vision for the site.

What is clear, however, is that at this point, there is no project for the public to comment on. If it is the City’s intent to seek the public’s input as to which project alternative should be selected for further detailed planning, it is our client’s opinion that an alternative that would develop 150 homes on the project site should not be advanced as such a proposal suffers from similar problems that plagued the prior land use proposals for the site. The development of 150 homes on 50 acres is simply too intensive of development for this rural residential community and is not in keeping with the Orange Park Acres Plan.

Instead, the City should continue to coordinate with the applicant and the community to design a project based on Alternative E: the proposal calling for 25 acres to be developed with residential uses, another 60 acres devoted to the Santiago Creek Greenway, and a 24-acre organic garden and community activity center. A project based on Alternative E would allow for a sizeable section of the site to be developed with residential uses while also fulfilling the community’s vision and objectives for the project site.

B. Environmental Impact Analysis

To be adequate, an NOP must provide sufficient information describing the probable environmental effects of the project, in order to enable the public to make a meaningful response to the NOP. CEQA Guidelines § 15082(a)(1)(C). The City’s approach of publishing the NOP before a project has been selected contributes to the document’s troubling lack of detail. The document simply asserts that the project may result in environmental impacts but it does not provide any specificity as to the nature of these impacts. If the EIR suffers from the same lack of detail and focus, it will be legally inadequate under CEQA.
1. **Land Use and Planning**

   The EIR’s analysis of land use and planning impacts must be carefully conducted. As discussed above, the City is presented with a unique opportunity to develop one of the last remaining pieces of undeveloped land in eastern Orange. Assuming the applicant proceeds with Alternative A, such extensive development would irreparably alter the historical heritage of Orange Park Acres. Consequently, the DEIR must thoroughly analyze the project’s impact on the community’s unique ambience. If these impacts are determined to be significant, the DEIR must identify feasible mitigation measures and or alternatives to the project. Such measures should include modifying land use designations to ensure compatibility with the surrounding community and the dedication of permanent open space lands in the area to offset the impacts of proposed development.

   Of critical importance, the DEIR must evaluate the Project’s consistency with local plans, including the City of Orange General Plan, Orange Park Acres Plan, the East Orange General Plan, and the Santa Ana River, Santiago Creek Greenbelt Plan, and the Santa Ana River/Santiago Creek Greenbelt Implementation Plan. Alternative A’s intensive residential development would likely be inconsistent with the spirit and intent of those plans. Such conflicts with governing land use plans are significant environmental impacts under CEQA. See *The Pocket Protectors v. City of Sacramento* (2005) 124 Cal.App.4th 903, 928.

2. **Biological Resources**

   The DEIR must assess whether the project would adversely impact special-status species and their habitat, including Santiago Creek’s riparian habitat. In addition, the DEIR must assess whether the proposed Project would conflict with federal, state and local regulations and policies intended to protect biological resources.

   A full analysis of the project-specific and cumulative effects on biological resources impacts will be essential to development of effective mitigation measures to ensure that biological resources’ impacts will be fully offset. This detailed analysis must be prepared by a qualified, independent biologist. The biological resources study must be based on surveys and detailed field studies that are completed at appropriate times of the year for each species potentially in the project vicinity.

3. **Water Resources and Hydrology**

   The proposed project site is located within a dam inundation zone and is subject to liquefaction. These are serious site development constraints which must be carefully studied. The DEIR must also determine whether development of the proposed project
would result in the violation of any water quality standards, deplete groundwater supplies or interfere with groundwater recharge, alter existing drainage patterns, result in substantial new amounts of polluted runoff, or increase the risk of flooding including the potential for a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Significant impacts to the hydrologic regime and water quality could result from the proposed project because, depending on which alternative is selected, development may require extensive grading. Water quality and water resources impacts must be evaluated from both construction activities and the project’s operation with special attention given to the adjacent property, a former landfill, which vents methane.

4. Air Quality and Climate Change Impacts

The DEIR must contain a thorough analysis of project-specific and cumulative impacts to air quality. Particular attention should be paid to construction-related increases in air emissions including the emissions that would result from moving the mounds of dirt on the site, some of which may be contaminated.

The DEIR must also address the project’s impact on climate change. This analysis is particularly important because existing conditions are such that we have already exceeded the capacity of the atmosphere to absorb additional greenhouse gas (“GHG”) emissions without risking catastrophic and irreversible consequences. Therefore, even seemingly small additions of GHG emissions into the atmosphere must be considered cumulatively considerable. See Communities for a Better Environment v. Cal. Resources Agency (2002) 103 Cal.App.4th 98, 120 (“[T]he greater the existing environmental problems are, the lower the threshold for treating a project’s contribution to cumulative impacts as significant.”); see also Center for Biological Diversity v. National Highway Traffic Safety Administration (9th Cir. 2007) 508 F.3d 508, 550 (“[W]e cannot afford to ignore even modest contributions to global warming.”). To this end, the DEIR must specifically analyze how the project would comply with AB 32, the Global Warming Solutions Act of 2006, which requires the State of California to reduce GHG emissions to 1990 levels no later than 2020. In addition, the DEIR must analyze the project’s consistency with Executive Order (“EO”) S-3-05 which calls for reducing GHG emissions to 80% below 1990 levels by 2050, and EO B-30-15, signed by the Governor in 2015, which establishes an interim target to reduce GHG emissions by 40 percent below 1990 levels by 2030.

5. Transportation and Circulation

The DEIR must thoroughly analyze the project’s transportation and circulation impacts. The project, and especially Alternative A, has the potential to result in a
substantial increase in traffic and could, therefore, overwhelm the local street and intersection network. Moreover, any substantive increase in traffic could pose a risk to pedestrians, bicyclists and equestrians who routinely rely on the area’s roadways and trails.

6. Visual Resources

The DEIR must analyze the impacts of the proposed project on aesthetics including scenic vistas, scenic resources (including trees), the juxtaposition of the proposed development with the surrounding low density community, and the potential for an increase in light or glare to the surrounding vicinity. This analysis must include clear graphics showing pre- and post-project visual conditions using appropriate techniques, i.e., photo-simulations.

7. Cultural Resources

The DEIR must survey for cultural resources on the site. CEQA regulations must be followed to ensure the protection of cultural resources.

8. Cumulative Impacts

An EIR must discuss the cumulative impacts of a project when the incremental effects of the project are considerable when viewed in connection with the effects of other past, current, and probable future projects. CEQA Guidelines §§ 15130(a), 15065(c). Projects currently under environmental review clearly qualify as reasonably probable future projects to be considered in a cumulative impacts analysis. See San Franciscans for Reasonable Growth v. City & County of San Francisco, 151 Cal.App.3d 61, 74 n.13 (1984). In addition, projects anticipated beyond the near future should be analyzed for their cumulative effect if they are reasonably foreseeable. See Bozung v. Local Agency Formation Comm’n, 13 Cal.3d 263, 284 (1975).

C. Project Alternatives

CEQA emphasizes that an EIR must analyze a range of reasonable alternatives to the project. The alternatives must feasibly attain most of the basic project objectives while avoiding or substantially lessening the project’s environmental impacts. See Public Resources Code § 21100(b)(4); see also CEQA Guidelines § 15126.6(a). The CEQA Guidelines state that the selection and discussion of alternatives should foster informed decision-making and informed public participation. (See CEQA Guidelines § 15126(d)(5).
Given the significance of the project site, the City should identify and evaluate several alternatives to the proposed project. It appears the City and the applicant may have already initiated this process based on the schematic figures in the NOP. It will be critical, however, for the EIR to fully flesh out the details of each land use alternative so that the public and decision-makers are fully informed of each alternative’s benefits and environmental impacts.

III. Conclusion

We appreciate the opportunity to provide these comments. Given that the City and the applicant have not identified a project, and because the NOP does not provide adequate information regarding the nature of the project and its probable environmental impacts, we respectfully request that the City revise and recirculate its NOP. Alternatively, if the City intends to proceed with the preparation of the DEIR without republishing the NOP, please keep this office informed of all notices, hearings, staff reports, briefings, meetings, and other events related to the proposed project. In addition, please notify us of the release of the DEIR.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

[Signature]

Laurel L. Impett, AICP, Urban Planner

cc: Donald Bradley, President, Orange Park Association
A.3 - Scoping Meeting Sign-In Sheets
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TRAILS AT SANTIAGO CREEK SPECIFIC PLAN
ENVIRONMENTAL IMPACT REPORT
SCOPING MEETING
THURSDAY, MARCH 16, 2017
COMMENT CARD

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TRAILS AT SANTIAGO CREEK SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

SCOPING MEETING

THURSDAY, MARCH 16, 2017

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TRAILS AT SANTIAGO CREEK SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

SCOPING MEETING

THURSDAY, MARCH 16, 2017

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TRAILS AT SANTIAGO CREEK SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

SCOPING MEETING

THURSDAY, MARCH 16, 2017

COMMENT CARD

NAME / AFFILIATION: Deborah Tous

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# of homes

Traffic

Flood Zone?

Open Space is important

Trail Access

Abiding by the current OPA access lots

Retaining the OPA environment.
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

SCOPING MEETING

THURSDAY, MARCH 16, 2017

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NAME / AFFILIATION: Carol Cora

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Impact

Traffic

Zoning - Lot Size

Keeping with General Plan
Traffic during 4-6 pm on Santiago Canyon Bl is bumper to bumper. People wanting to go around toll road to save money or avoid the freeway have now decided to use Santiago Cyn Bl. It is crazy. Do I see homes on the 40 acres.
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN

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COMMENT CARD

NAME / AFFILIATION: Kelly Herbeck
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Traffic
Environment
Noise
Crime
No building along Mabury
Not 150 homes not zoned
A - D all allow for more housing acreage than E which makes it a preferable choice. Fewer houses = fewer cars. There is already way too much traffic on Santiago Canyon in the morning & evening. Adding even one more house will make this problem even worse.

E includes a beautiful garden & community center space as well as the equestrian center which is vital to this OPA community. Both would enhance the space for new residents as well as current neighbors. They provide some measure of offset in return for the additional development & traffic.

The greenway/open space is a nice aspect of each of the A-E options.
I am representing our MRAA President, Dick Hollinger, who could not be here tonight. We support trails, a passive greenbelt and organic garden.

We have concerns about the eucalyptus restoration and flood mitigation.

We do not support the applicant’s plan “A.” We are concerned about the increased traffic on Santiago Canyon and Canvas Rd. The approved Ivan Co. development will bring. Any plan that allows more than developing the already zoned acres will have a negative effect on traffic. We request the applicant withdraw the plan “E” that calls for homes north of the creek. We support plan “E.”

We also don’t feel this was a great way to solicit comments from residents — by allowing the applicant to submit 6 plans.

Residents were confused and frustrated. Thank you.
Alternative E is the only acceptable plan.

Major concerns with other alternatives include:

- Traffic and flood protection

- Must be consistent with 2018 Specific Plan & East Orange Specific Plan
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN
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SCOPING MEETING
THURSDAY, MARCH 16, 2017

COMMENT CARD

NAME / AFFILIATION: Craig Olson / Salem Lutheran Church
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EMAIL: craig.olson @ att.net

Alt A: Traffic / ingress / egress for residents
- Soil stability / flood risk at NE residential area

Alt C: Traffic / ingress / egress for residents
No buffer from landfill area (methane)
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN
ENVIRONMENTAL IMPACT REPORT
SCOPING MEETING
THURSDAY, MARCH 16, 2017

COMMENT CARD

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I prefer design E.

We are most concerned about the condition of the g. creek and the development of the multi-purpose trail system. We hope that the creek will be restored.

Design E is most appropriate because it matches the Build Authority based on the current zoning of some of the properties.

We are very concerned about homes located too close to the creek - for the safety of the homes and the healthy Meghan.

Pamela Galera
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN
ENVIRONMENTAL IMPACT REPORT
SCOPING MEETING
THURSDAY, MARCH 16, 2017
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Alternative A: Too many homes, too great an impact on existing traffic. No provision for equestrian

B

B Same as above

C Same as above

D Better than A-C. Greenway buffer between homes + methane site.
Residences closer to other existing residences. Still too many homes.

E Preferred alternative (or all open space)
Small residential footprint more appropriate for rural nature of community +
less impact on already terrible traffic. Also, community engagement - organic garden
& community center.
Includes more green space for creek/watershed.
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN
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Alternative A: 1. Deficient in trails. Need trail @ intersection of residential and passive green area. and between project and old landfill. Council @ NB comes to existing trail system and trail along Santiago.
2. Residential area concentrated in area of highest flood concern

Alternative B: Residential too close to city emissions from landfill

Alternative C: Residential area seems small. 2. Adjacent to I-5. South of Santiago is good. We need formal inclusion of the land.

Question on "passive green area": what activities would be allowed? Would the equestrian area be a permitted activity?

What remediation is required for residential construction on top of old recycling operation? Ashes? Building toxins?
NAME / AFFILIATION: JACK STEMPER
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What is the maximum traffic capacity of Santiago Cyn Road? Is that maximum currently exceeded?

How does it impact the flood plains? What remedies will be made?

Consider the impact on Villa Park High School, Corona Villa Middle School, and Linda Vista Elementary. These schools are already overcrowded.

Consider impact on Taft, the main thoroughfare to VPHS and CV middle schools.
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

SCOPING MEETING

THURSDAY, MARCH 16, 2017

COMMENT CARD

NAME / AFFILIATION:

MAILING ADDRESS:

EMAIL:

Hollis Fitz 2712 E. Santiago Canyon Rd Support Plan E.
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

SCOPING MEETING

THURSDAY, MARCH 16, 2017

COMMENT CARD

NAME / AFFILIATION: John Moore ISCGA

MAILING ADDRESS: 2707 Kellingworth Ave Orange 92869

EMAIL: johnmoore2889@sbcglobal.net

- As much open space as possible
- Open space should connect with open space to the east
- Open space should become part of Santiago Oaks Park
- Keep creek as natural as possible
- Connect Santiago Creek Bike Path to Santiago Oaks Regional Park
- Include Equestrian & Hiking Trails
- Include地点: original location of the creek in environmental studies
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN
ENVIROMENTAL IMPACT REPORT
SCOPING MEETING
THURSDAY, MARCH 16, 2017
COMMENT CARD

NAME / AFFILIATION:

MAILING ADDRESS:

EMAIL: Bob Kirkby G AOL.com

1 ACRE HOUSES

STICK TO SPECIFIC PLAN
GO TO SANTIAGO BLVD AT
8:00 AM AND TELL ME MORE
TRAIL IS A GOR OEP
18 ACRES DEVELOPMENT

MAP E
TRAILS AT SANTIAGO CREEK SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

SCOPING MEETING

THURSDAY, MARCH 16, 2017

COMMENT CARD

NAME / AFFILIATION: Sharon Mule'

MAILING ADDRESS: 1401 E Saddlehill Trail Orange CA 92869

EMAIL: Swmule@aol.com

It is imperative that the developer agree that proper design and building within the zoning code and specific plan must take precedence over profit. Plan E would be closest to an acceptable option.