



P.O. BOX 9668
SOUTH LAGUNA, CA
92652-7639
southlaguna.org

RECEIVED
South Coast Region

AUG 19 2016

CALIFORNIA
COASTAL COMMISSION

August 10, 2016

California Coastal Commission
South Coast District Office
200 Oceangate, 10th Floor, Suite 1000
Long Beach, CA 90802
Attn: Ms. Amber Dobson, Analyst, and Commissioners
Re: Newport Beach Banning Ranch (opposition to permit)
Permit Application No. 5-15-2097

Dear Ms. Dobson and Commissioners,

Since 1946, the South Laguna Civic Association has been the authoritative voice for citizens living in this area of Laguna Beach. The 200-plus members of our civic organization have been energetically involved in coastal matters since our founding. In that regard we have been highly supportive of the Coastal Commission, which has helped us gain public access to Table Rock Beach and other local beaches and facilitated our obtaining of amenities, view corridors, and public access to the surf and sand at the Montage resort. So for more than half a century SLCA has relied on the Commission to enforce the California Coastal Act for the benefit of the public and the environment. We now urge the Commission to not permit the current development plan for the 401-acre Banning Ranch property.

Among numerous reasons for opposing this project, we will stress three. First, the development as conceived is too extensive. Whether building 1375 homes as originally intended, or 895 homes as currently envisioned, the plan of Aera Energy LLC and its investment partners will result in far too much development for the largest remaining parcel of open space in coastal Orange County. Add the proposed 75-room resort hotel, a 20-bed hostel, 75,000 square feet of commercial space, a 4-lane 50 mph roadway (Bluff Road) traversing Banning Ranch property plus arterial highways, continued oil drilling in designated parts of the property, a sports park comprising 6 tennis courts, soccer fields, baseball fields, a skateboard park, 2 parking lots with spaces for more than 125 vehicles, and one readily sees that the resulting complex bulges into a small city. Aside from the extent of the project's footprint, the resulting traffic congestion and air pollution by themselves would clearly signify over-development.

Second, the proposed project would intrude into an Environmentally Sensitive Habitat Area, protected under the California Coastal Act: (ESHA)--section 30240: "(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas." A 1999 California Supreme Court decision, *Bolsa Chica*



P.O. BOX 9668
SOUTH LAGUNA, CA
92652-7639
southlaguna.org

Land Trust et al. v. California Coastal Commission, underscored the ESHA prohibition, adding that such intrusions could not be mitigated. Most clearly the proposed project would encroach into ESHA at the southeast corner of Banning Ranch where the Sunset Ridge Park Banning Ranch entrance road would be built. Endangered California Gnatcatchers have made their home there, according to numerous surveys dating back to 1992. Potential intrusions into ESHA would occur elsewhere on the site as well.

Third, a viable alternative to development exists: After Aera and its associates clean up the pollution left in the wake of 70 years of oil drilling, the Banning Ranch Conservancy is committed to raising money to buy the property and transforming it into a public nature preserve. The nature preserve would feature seasonal pools, an estuary, and an Interpretive Center/Museum. The instrument for such a purchase would be Proposition M funds, which include up to \$240 million for habitat acquisition. The Conservancy has already submitted an application for a portion of those funds. A potential obstacle presents itself here: Access to Measure M funds would require the consent of Aera and its partners. Still, the possibility of obtaining such consent cannot and should not be ruled out at this point.

In sum, permitting this project would pack too much development into the Banning Ranch property, intrude into ESHA, and is unnecessary given that an alternative, ecologically sound, public-centered option is available. Consequently, the SLCA Board of Directors strongly recommends that the Coastal Commission reject the development plan, thereby giving the nature park alternative a chance to succeed. On this 40th anniversary of passage of the landmark California Coastal Act there could be no better way to honor both the letter and spirit of a law that aimed to preserve what remains of California's vanishing coast.

Thank you for giving serious consideration to our concerns and recommendations.

Sincerely,

A handwritten signature in black ink that reads "Thomas Osborne".

Thomas J. Osborne, Ph.D.
Director
South Laguna Civic Association

A handwritten signature in black ink that reads "Greg O'Loughlin".

Greg O'Loughlin
President
South Laguna Civic Association



August 18, 2016

Ms. Amber Dobson, Coastal Program Analyst
California Coastal Commission
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Re: Newport Banning Ranch Project – Application 5-13-032

Dear Coastal Commissioner Chair Kinsey, Commissioner and Staff,

Enclosed you will find two letters submitted to the Coastal Commission from Newport Crest Homeowners Association, dated September 11, 2015 and February 16, 2016.

The letters are a response to the planned Newport Banning Ranch development. As stated in the letters, the Association is strongly opposed to the placement of buildings next to the perimeter of Newport Crest, as well as the extremely close proximity to Newport Crest of the extension of 15th Street.

The Association is adding their objection to the plan submitted by the Banning Ranch Conservancy, which places buildings near the perimeter of Newport Crest.

Newport Crest Homeowners Association is requesting the letters be entered into the staff report and any other documents concerning the Newport Banning Ranch development that will be presented to the Coastal Commission in the future.

Thank you,

Newport Crest Board of Directors

Mark Gonzalez, President
Ginny Lombardi, Vice President
Sharon Boles, Secretary
Don Bruner, Treasurer
June Palomino, Member at Large

From: [Tom Falvey](#)
To: BanningRanchComments@Coastal
Date: Tuesday, August 16, 2016 12:46:42 PM

Please clean up and restore Banning Ranch to its natural state.

Tom Falvey

From: [Bill McCarty](#)
To: BanningRanchComments@Coastal
Subject: Please require NBR to issue a willing seller letter for Banning Ranch
Date: Friday, August 12, 2016 11:47:09 AM

Dear Coastal Commission Staff,

As we prepare for yet another hearing on Banning Ranch, I would like to make two requests on behalf of our grassroots community group that has spent countless hours and our personal funds to spread awareness about Banning Ranch throughout our community:

(1) Please include in your updated staff report the compilation of notes from children that we previously submitted for the planned May hearing

(2) Please remind Commissioners of their requests that the developer NBR be open to selling Banning Ranch at a fair price.

We have maintained our position of no development on Banning Ranch - due to the current zoning of the land as open space, the will of people to keep it open space, the rare natural habitats that live on Banning Ranch, and the many negative impacts that would come with development. We would like to protect all 100% of Banning Ranch and believe that any development that fragment the land is only the first step to losing all of it.

Among the hundreds of people in the community that we have had face to face conversations with, the vast majority support the goal to save all of Banning Ranch. Among those few who agree with the development plan, they do so grudgingly -- not because they support development, but because they believe its the only way to save a majority of the land. This has been a misleading marketing tactic by the developer (who has submitted lies or omitted important parts of their plan in communications to the public) that we are working to combat.

One important part of our (and many others') efforts in the months since the October hearing making incredible progress creating awareness about Banning Ranch and development the base of support to achieve our ultimate goal of acquiring Banning Ranch. We believe that acquiring Banning Ranch is the only way to save the rich ecosystem highlighted in the Staff's initial report on Banning Ranch and known by many of our supported who have grown up near the ranch and observed the wildlife first hand.

A critical step in our effort save all of Banning Ranch is having the would-be-developer acknowledge a willingness to sell Banning Ranch at fair market price. At the October hearing, Chair Kinsey asked the developer for exactly this, and his request was repeated by Commissioner Luèvano:

At the October 7, 2015 Coastal Commission hearing Chair Kinsey stated that it would be "appropriate, responsible, and telling" for the applicant, Newport Banning Ranch LLC (NBR), to consider, as a condition of approval, giving the public a period of time to purchase the entire property for conservation purposes for the amount of the appraised market value of the property. Commissioner Luèvano, in her closing comments, also "urged the developer to listen to the community and their

concerns", and offer to come to the table to discuss the purchase of the property, and that this was "something that needs to be continued to discussed."

We have made great progress on our end, but have received no cooperation on the developer NBR. In fact, the developer has become more aggressive in its propaganda about their plan being the only option and stating that if their plan (which is still inconsistent with the Coastal Act) they will never share the space with the public.

We ask only that the Staff and Commission recall these words from the October hearing and request the developer be a cooperative party in the discussion about fair compensation to protect 100% of Banning Ranch and its rich history and resources.

Thank you very much,

Bill McCarty

Resident, Costa Mesa

Volunteer, [Facebook.com/SaveBanningRanch](https://www.facebook.com/SaveBanningRanch)

From: [Gabrielle Weeks](#)
To: BanningRanchComments@Coastal
Cc: mfp2001@hotmail.com; "Ann Cantrell"
Subject: no development in Banning Ranch
Date: Friday, August 12, 2016 6:30:52 PM

Please do not approve development of Banning Ranch, it is a special place and to have a small outdoor recreation area would increase tourism and local enjoyment.

Banning Ranch is a 400-acre parcel of coastal bluffs and adjacent wetlands, close to where the Santa Ana River enters the Pacific Ocean. My family supports preserving the entire Banning Ranch property as open space as recommended by the City of Newport Beach General Plan.

Wetlands have unfortunately been destroyed as our cities grew in SoCal, filled in our dredged for marinas. Wetlands are important nurseries for fish and birds, swampy area protect the little ones from coyotes and predators.

Banning Ranch is the largest parcel of unprotected coastal open space and wetland property remaining in Orange County and can provide public access to many outdoor recreational activities such as hiking, birdwatching and biking. There is also great potential for providing interpretive and educational opportunities to the public. The entire property offers exceptional views of the ocean and Catalina.

Gabrielle Weeks

From: [Arlis Reynolds](#)
To: BanningRanchComments@Coastal
Cc: [Ozreynolds](#); [Nova Wheeler](#); [isabelle phillips](#); [Bill McCarty](#)
Subject: Fwd: A letter from the communities around Banning Ranch
Date: Friday, August 12, 2016 12:01:39 PM
Attachments: [SBRT_Submission_20160428.pdf](#)

Dear Coastal Commission Staff,

As we prepare for yet another hearing on Banning Ranch, I would like to make two requests on behalf of our grassroots community group that has spent countless hours and our personal funds to spread awareness about Banning Ranch throughout our community:

(1) Please include in your updated staff report the compilation of notes from children that we previously submitted for the planned May hearing (attached)

(2) Please remind Commissioners of their requests from the October hearing that the developer NBR demonstrate a willingness to sell Banning Ranch at a fair price. We believe this was an important condition from the Commissioners as part of their offer to defer the decision rather than deny the project as recommended in the staff report.

We have maintained our position of no development on Banning Ranch - due to the zoning of the land as open space, the will of people to keep it open space, the rare natural habitats that live on Banning Ranch, and the many negative impacts that would come with development. We would like to protect all 100% of Banning Ranch and believe that any development that fragments the land is only the first step to losing all of it.

Among the hundreds of people in the community that we have had face to face conversations with, the vast majority support the goal to save all 100% of Banning Ranch. Among those few who agree with the development plan, they do so grudgingly -- not because they support development, but because they believe its the only way to save a majority of the land. This has been a misleading marketing tactic by the developer (who has submitted outright lies or omitted important parts of their plan in communications to the public) that we are working to combat.

One important part of our (and many others) efforts in the months since the October hearing is making incredible progress creating awareness about Banning Ranch and developing a strong base of support to achieve our ultimate goal of acquiring Banning Ranch. We believe that acquiring Banning Ranch is the only way to save the rich ecosystem highlighted in the Staff's initial report on Banning Ranch and known by many of our supporters who have grown up near the ranch and observed the wildlife first hand.

A critical step in our effort save all of Banning Ranch is having the would-be-developer acknowledge a willingness to sell Banning Ranch at fair market price. At the October hearing, Chair Kinsey asked the developer for exactly this, and his request was repeated by Commissioner Luèvano:

At the October 7, 2015 Coastal Commission hearing Chair Kinsey stated that it would be "appropriate, responsible, and telling" for the applicant, Newport Banning Ranch

LLC (NBR), to consider, as a condition of approval, giving the public a period of time to purchase the entire property for conservation purposes for the amount of the appraised market value of the property. Commissioner Luèvano, in her closing comments, also “urged the developer to listen to the community and their concerns”, and offer to come to the table to discuss the purchase of the property, and that this was “something that needs to be continued to discussed.”

We have made great progress on our end, but have received no cooperation from the developer. In fact, the developer has become more aggressive in its propaganda about their plan being the only option and stating that if their plan (which is still inconsistent with the Coastal Act) is not approved, they will never share the space with the public.

We ask only that the Staff and Commission recall these words from the October hearing and request the developer be a cooperative party in the discussion about fair compensation to protect 100% of Banning Ranch and its rich history and resources, following the spirit of the important California Coastal Act pushed into law by the people of California fighting to protect our communities and environment from moneyed-interests.

Thank you very much,
Arlis Reynolds

Resident, Westside Costa Mesa
Founder, Facebook.com/SaveBanningRanch

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

From: **Arlis Reynolds** <arlis.reynolds@gmail.com>

Date: Thu, Apr 28, 2016 at 3:56 AM

Subject: A letter from the communities around Banning Ranch

To: BanningRanchComments@coastal.ca.gov

Cc: Ozreynolds <ozreynolds@sbcglobal.net>, isabelle phillips <isaphi7@gmail.com>, Nova Wheeler <novawheeler@earthlink.net>, Bill McCarty <mccarty.video@gmail.com>

To Coastal Commission Staff,

Thank you for your hard work and dedication to protecting our beautiful coastline and upholding coastal laws.

Please see the attached letter from community members regarding the proposed Banning Ranch development project.

Thank you,
Arlis Reynolds

“we don’t inherit the earth from our fathers, we borrow it from our children.”

A decision to build on Banning Ranch, to grade and pave over some of our last natural coastal habitats, is **irreversible**. We will forever lose a natural coastal ecosystem, forever lose native species of plants and animals, and forever lose open space that creates a serene and special environment for communities along the Santa Ana river corridor.

Please protect the rare and sensitive habitats on Banning Ranch, and help us preserve the limited natural open space we have left so future generations can enjoy the coastal wilderness we have been blessed to experience.

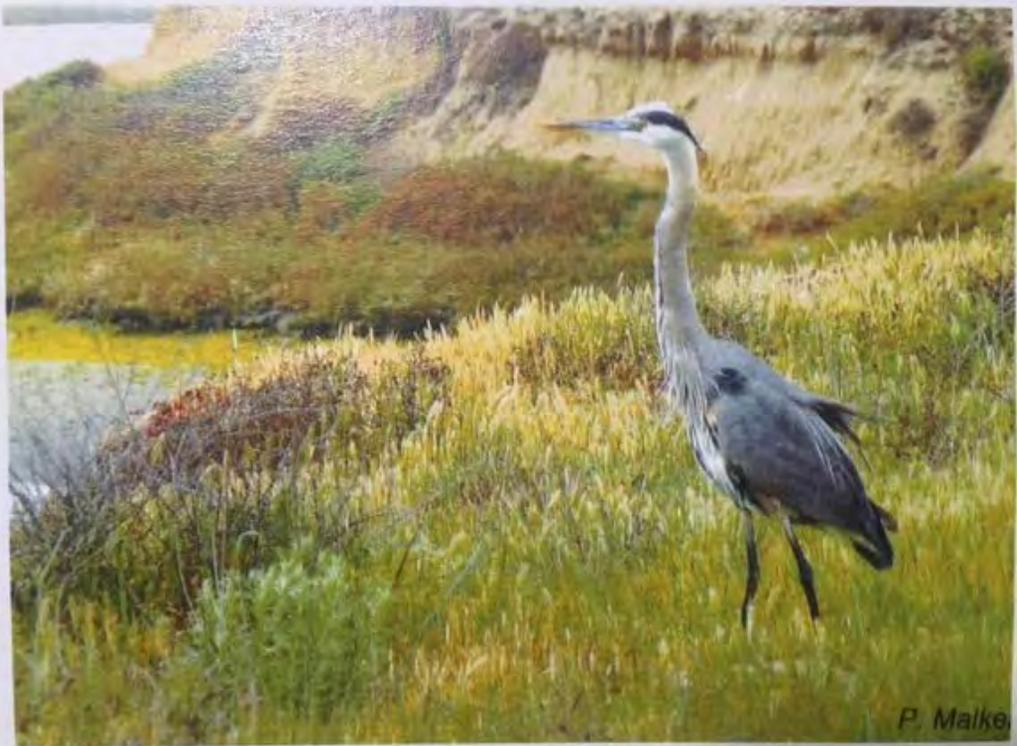
Saving Banning Ranch Together

The “Save Banning Ranch Together” movement was created by community members concerned about the impacts of proposed development on Banning Ranch—some of the last coastal wilderness and home to many native and endangered species—on our communities now and in the future.

We are families, neighbors, community members, and citizens of this Earth concerned about the world we are creating (or destroying) for today's and tomorrow's children.

We have spent countless hours of our free time outside of work and other “life” obligations to educate our communities about the proposed development. **Most concerned and upset are the children, who immediately and inherently understand that Banning Ranch is already a home and should be protected as such.**

Please enjoy, appreciate, and seriously consider concerns and desires of our communities to Save Banning Ranch together.



Keep the animals
safe. don't
put houses there.
Ariel

Monarch Butterfly



Dont tear it up,
let it be how it is
right now

Severin age:9



Dominic

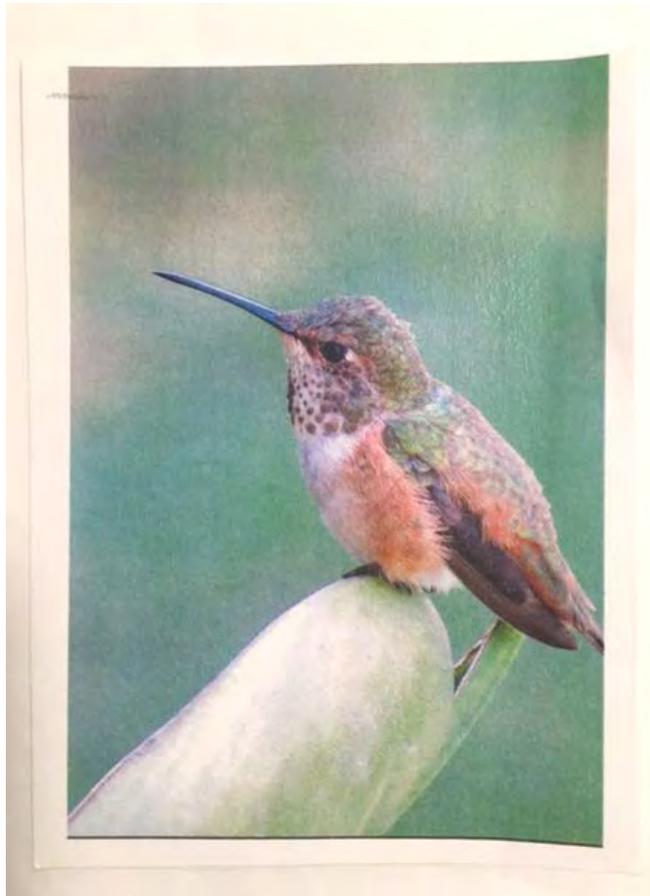
Don't put things on
Banning Ratsch please.



Please Commissioners
don't build on sacred
land we ALL need it
Animals 2
Roger



Saving Banning Ranch Together



Keep the skyline natural, its crowded
enough out here.



Saving Banning Ranch Together



Keep the beach beautiful!
Have a heart & save the
animals that live there!



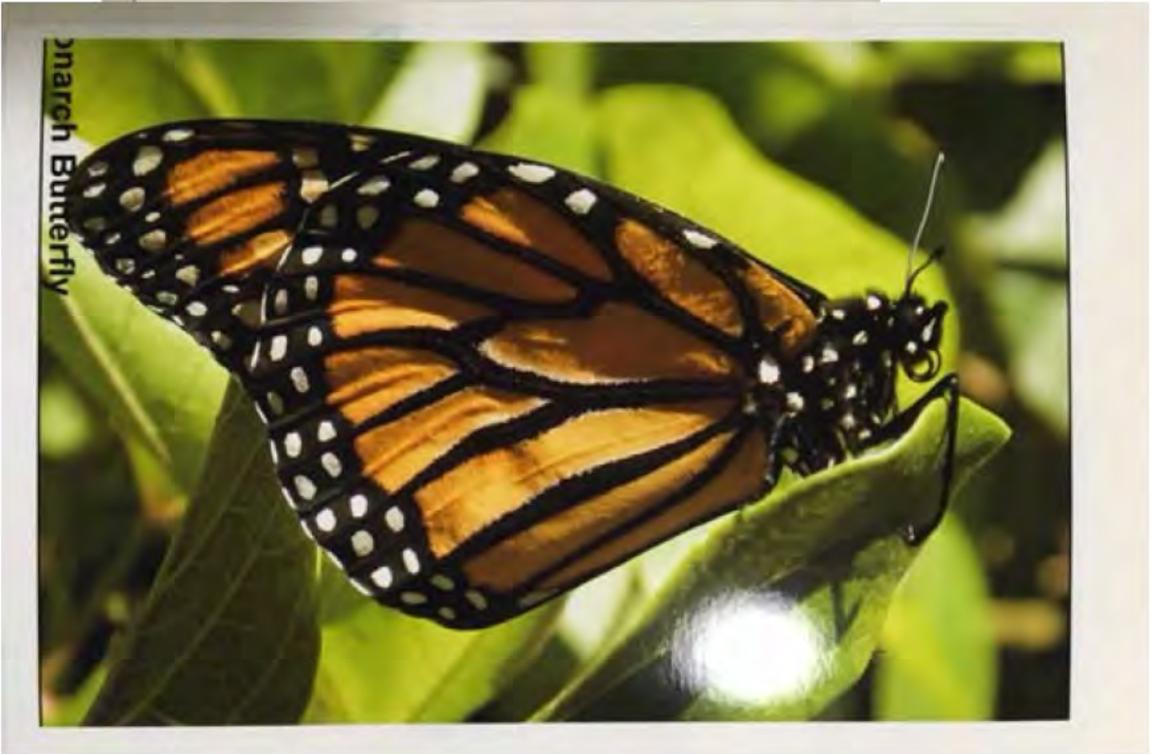
Hello,
my name is Riley Watson,
I'm a lifelong resident of
Newport $\frac{1}{2}$ Costa Mesa, and
I would love to see 100%
of Banning Ranch restored to
an open nature park. It's
too precious to waste!

If Banning Ranch is taken away from us, I will be sad because I won't be able to see the nature that lives there, I want to be able to see the burrowing owls and I want the osprey to have somewhere to nest. I have lived here since I was three and it has made Newport Beach a beautiful place. If that no longer exists, nothing will be the same. The animals that live there will be losing ^{their} ~~our~~ homes just to make more homes for other people which is unfair for the animals that have built a house and a family in that area. It is like forcing someone out of their house.

Save Banning Ranch!
-Jessie Phillips



#SaveBanningRanch
#Nature is Beauty
#GoGreen
#WeLoveAnimals



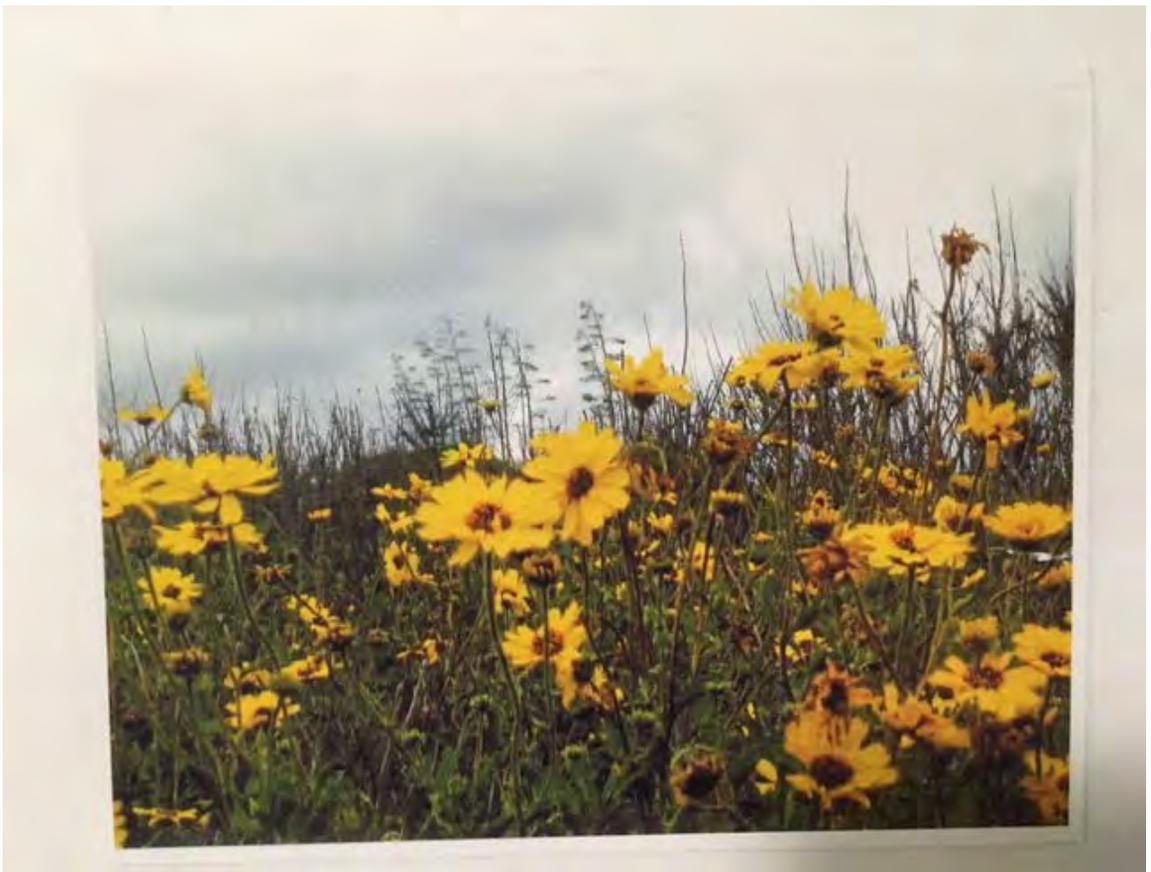


Lian Taing
Age: 11

Saving Banning Ranch Together

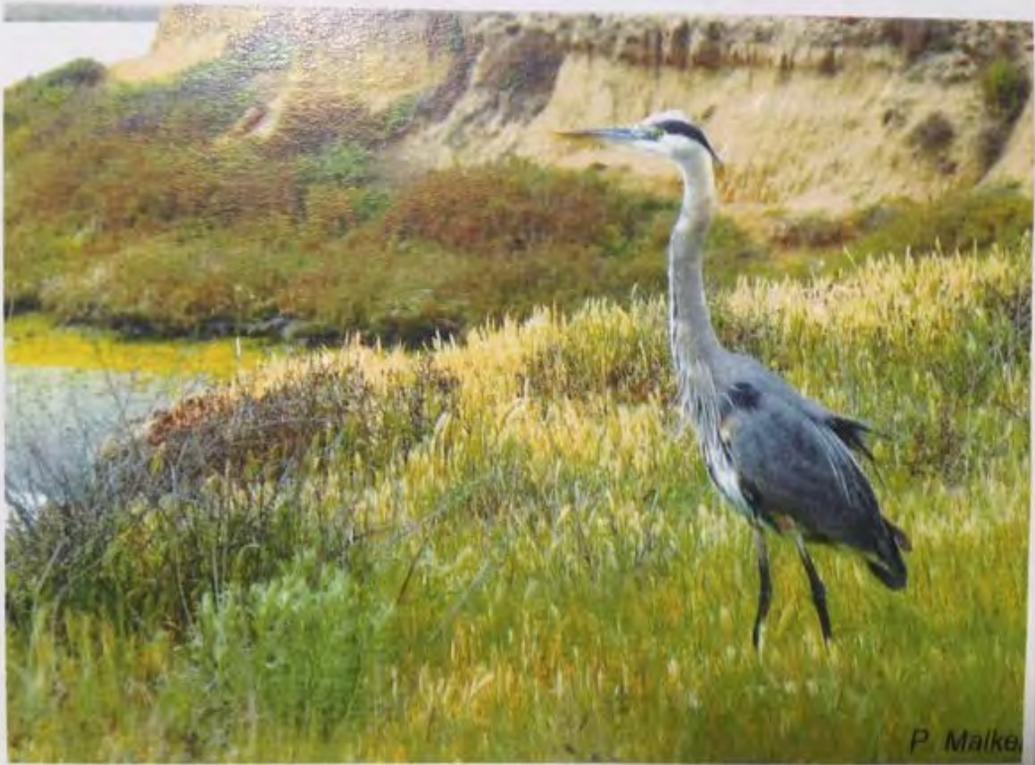


Banning Ranch has to be saved because
as you see on the picture a Great Blue Heron
we will be able to see them again but if
Banning Ranch is not saved we won't be
able to see these wonderful birds. Also I have
lived next to Banning Ranch for 12 years and
everyday I pass by it and I always love seeing
the wilderness of it but if you build what you
want to build I won't be able to see the
beautiful wilderness that I've seen since I was 6
and I'll miss that a lot. So please save Banning Ranch!!
Tom Phillips



LEO
save the Banning
Ranch!





PLEASE, don't
destroy our wild
life here!

From,
Ixchel



Save are
Coast please
Francesca
Cattill



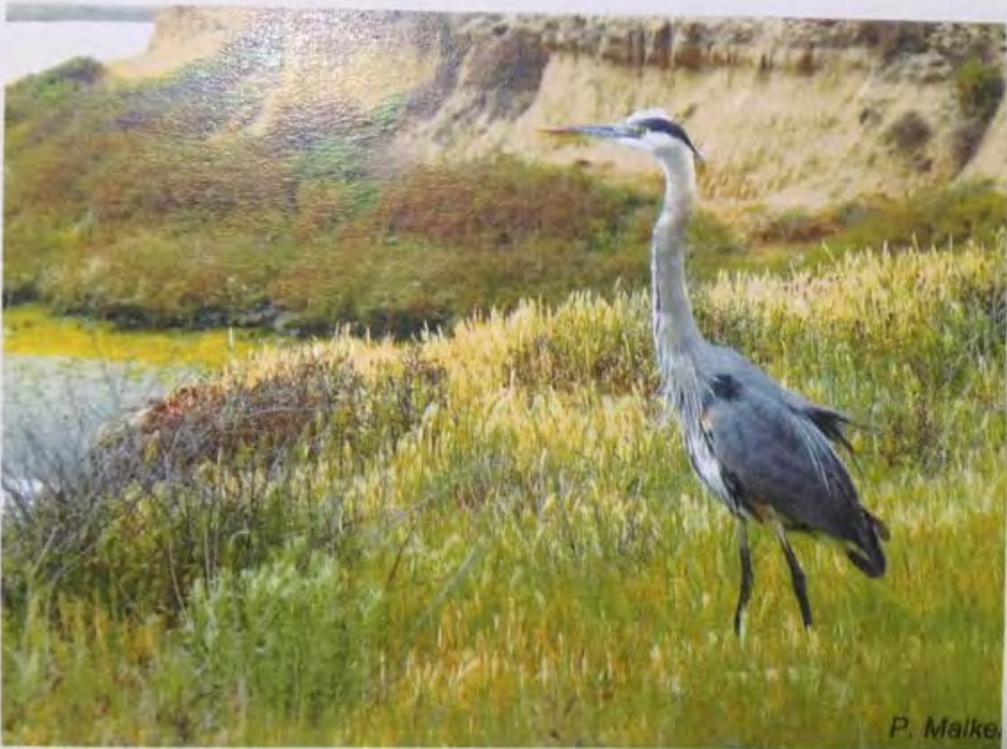


Give our
costs!
Gwen



Please save our
animals & don't
hurt the wildlife!
♥ EIC h 950.811
& Isabella





Rubi
Please save the
Banning Ranch!
Thank You!



Please Save the Wetlands!
Think about the animals

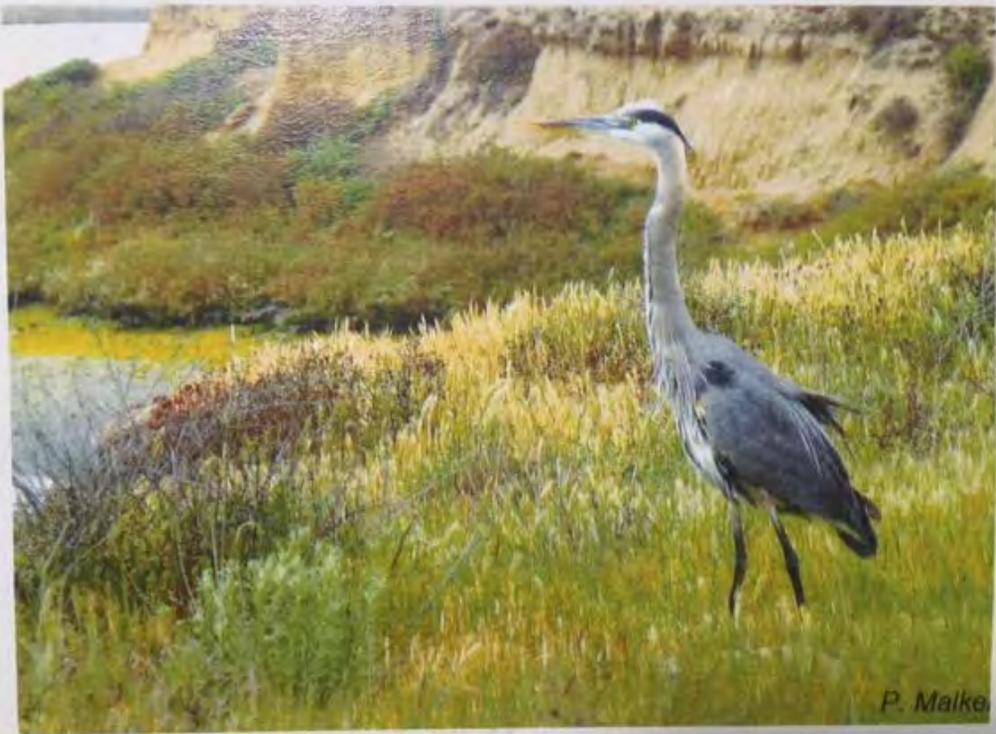
Karolyi
Thorpe
Age: 13





Please Save the Banning Branch.
Stop the destruction of sacred
sites. Please stop being arrogant.
Save the Branch. To much pollution
hurting the environment.

Brandon
Pires



Dear Commissioner,

Newport Beach

My name is Joseph Muller and I'm very concerned and worried about saving the Banning Ranch. Along with hundreds and thousands of other residents and people. I would greatly appreciate it if you can make it a concern of your own. Take some time and think about this carefully please! "GADBLESS"

New Port Beach City Council
We ask for you to
conserve the Banning
Ranch Conservancy.
Many plants and animals
rely on this land for
shelter and life.





Please save Banning
Ranch!

Liam Thorpe
age: 9





Newport Beach City
Council,
Please conserve this
beautiful place, it is
one of the only wet
lands left in the state
of California.



As citizens and members of the community, we urge you to protect and preserve Banning Ranch. Listen to the will of the people.

- Nick and Rachael O'Neill
Long Beach, CA

Dear Commissioner -

Please reconsider
developing the ranch.
The growth in O.C. is
suffocating. Please
allow future generations
the enjoyment of this
place.

Thank You -
Maureen McCart





Save BANNING
RANCH!



save the
World
Jaydon Fisk

12 August 2016

To: California Coastal Commissioners

From: Saving Banning Ranch Together

Re: Educational Outreach to Children

Save Banning Ranch Together (SBRT) is a grassroots coalition of Costa Mesa and Newport Beach intently passionate about acquiring and preserving Banning Ranch.

In the five months that we have been in existence, we have increased awareness of the existence of Banning Ranch through videos, posters, tee shirts, educational events, and hikes.

One of the most meaningful, impactful, and inspiring has been our outreach to the children in our community. The very children who stand to benefit from the opportunity (and even birthright since nature truly belongs to us all). The children who attend our events learn about the animals and plants that live on Banning Ranch or depend on that land for their continued survival. They inspire us by their compassion for wildlife. Their love for nature, the natural world, makes them the stewards of the Earth with the sincerest efforts to preserve the magical wonder of nature on Banning Ranch.

We continue to be inspired to fight for Banning Ranch for the children like Allen who has attended every event and has become our most influential ambassador and probably knows about every animal that lives on Banning Ranch. Then there is Lindsey who has returned with a slew of friends to show them all about Banning Ranch.

The children have voluntarily chosen to show their stewardship of Banning Ranch by writing these notes. Please read these notes, not from their views, but from their hearts and minds.

Olga Zapata Reynolds

Westside Costa Mesa Resident

Save Banning Ranch Together

All of these activities have been wildly successful given that we are not funded by any one.



'In hopes to
Save Banning
Ranch'
Seydon Kane

Paint the world
SUPER
COLORING



Save the Animals

Shiloh
Savber



Juvenile Red Tail Hawk

Please don't
take away
our home!
Baby hawk

Edyta
Lutz

Save Banning Ranch!

I enjoy walking around and seeing nature, it is such a bummer that people want to destroy it cause the place is amazing.

50

**SAVING
BANNING RANCH
TOGETHER!**



Opuntia flower



Save Banning Ranch!
save the animals, flowers,
birds and snakes!

50 mg
= 900
Isaac Serna (5 years old)



SAVING
BANNING RANCH
TOGETHER!

**SAVING
BANNING RANCH
TOGETHER!**

**SAVING
BANNING RANCH
TOGETHER!**

Save Banning Ranch

~~By~~ - Jared Martinez age 14

**SAVING
BANNING RANCH
TOGETHER!**

**SAVING
BANNING RANCH
TOGETHER!**

I went to go
see some
anunnilus

but I
could not
see much
anunnilus.
Ester





May 22, 16

Please save butterflies
Please save the wildlife

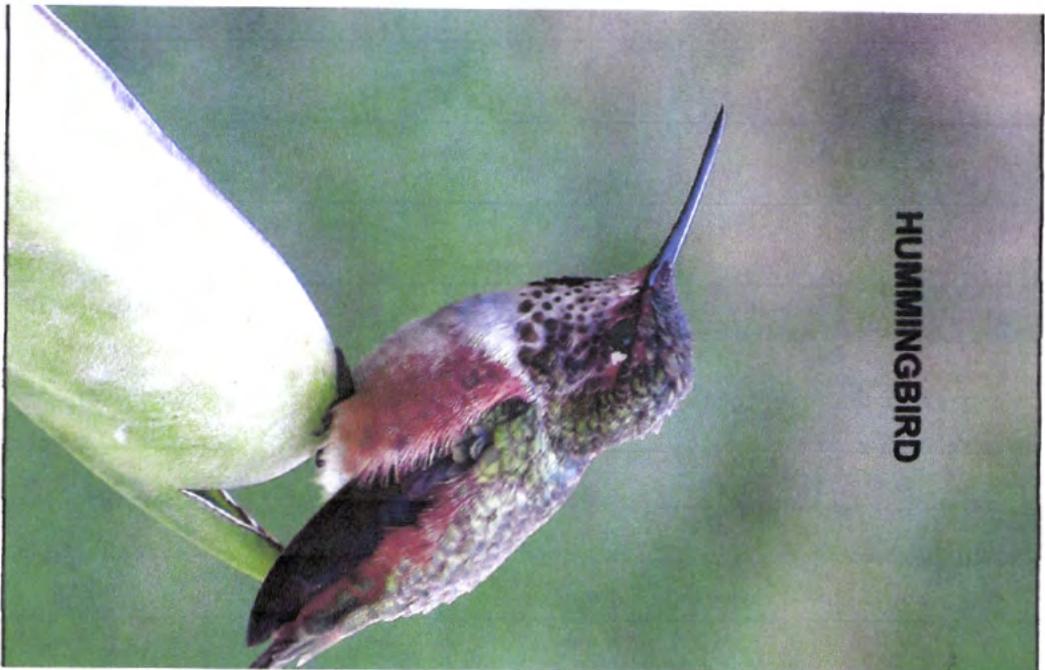
PS I LOVE, Shelley Ann
I love all animals. I'm only
3 1/2 years old animals are my passion
I want to be a veterinarian for my life



May, 2016
Please Keep all my animals in there
natural home I Love to see all
my animals in there homes. Animals
are my passion and my life and I'm
only 4 1/2 years old

Thank you
ISATAH

Please
save
the
animals
Trevor
6 YRS





Dear Coastal commission,
Please do not kill wildlife. I think the animals on the Banning ranch are cool. I really like to look at them so please do not destroy their home please & thank you. :)

from Malliaya Age 10.

Thank You



**SAVING
BANNING RANCH
TOGETHER!**

for
OWKs

Dani
age 9



F A N H O W

4 Yrs



Save The home
The burrowing
ow! ♡

— Abigail



Please save animals home!

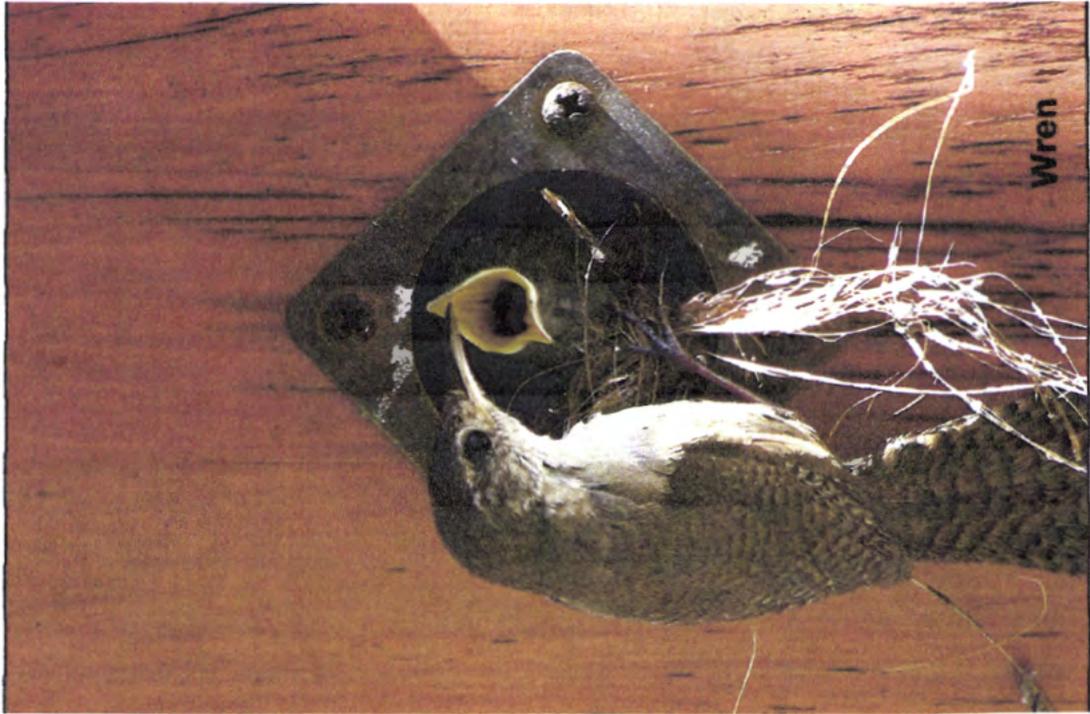
-GAILY

(age: 13)



Don't take the home
away from the wildlife.

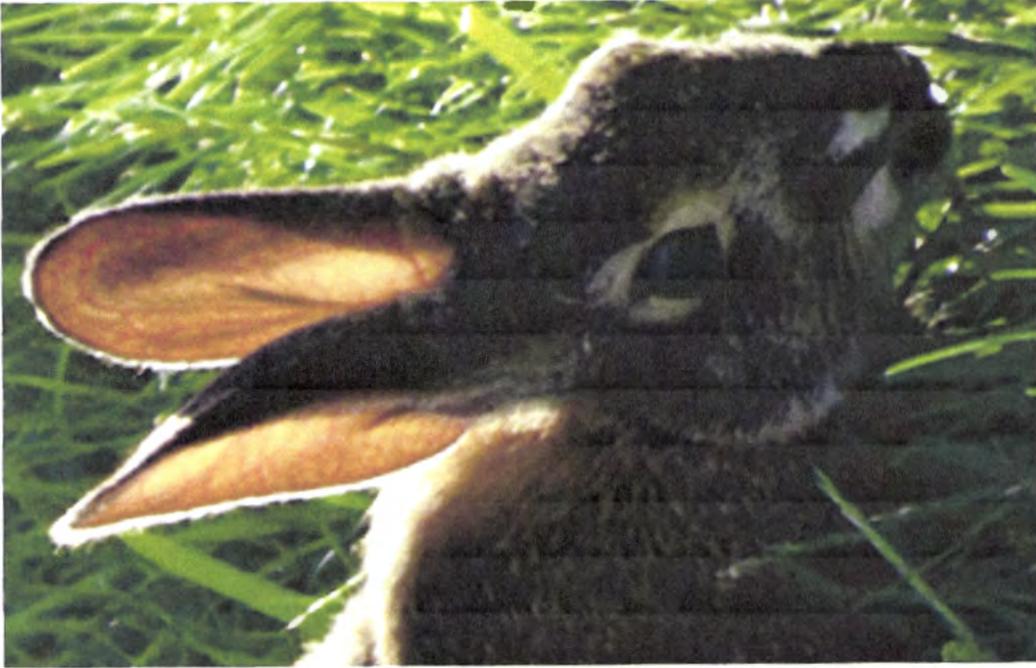
Isabella Duarte



Ryan Jago



Handwritten purple ink symbols consisting of circles and lines, arranged in two rows. The top row contains two groups of symbols, and the bottom row contains three groups of symbols.



Save the
wildlife!

Jenny 11



May 2016

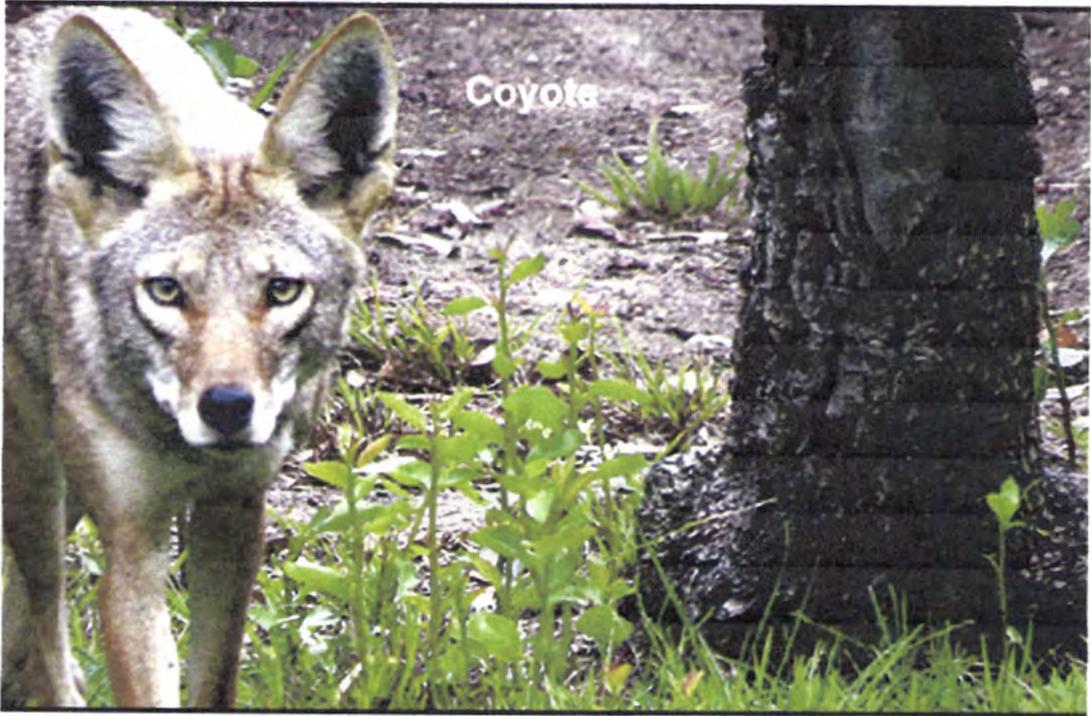
I am only 8 months old I already love all
animals and plants, flowers and water
Don't take away what you won't give me
for when I get older to enjoy more as
I grow older. I'm your future to take
care of this town Costa Mesa and this
world we all leave in.

Thank you,
Rozzelyn



Heren

print the world
SUPER
COLORING



Sophia Jape

AIRB



**SAVING
BANNING RANCH
TOGETHER!**

From: [Olga Reynolds](#)
To: [BanningRanchComments@Coastal](#)
Subject: Fwd: Another Banning Ranch Letter
Date: Friday, August 12, 2016 4:56:27 PM

Please include in the Banning Ranch Comments or report.
Thank-you,
Olga Zapata Reynolds

Sent from my iPad

Begin forwarded message:

From: Mathew Forth <mforth@greenpeace.org>
Date: August 5, 2016 at 10:41:10 AM PDT
To: Ozreynolds <ozreynolds@sbcglobal.net>, Bill McCarty
<mccarty.video@gmail.com>
Subject: Another Banning Ranch Letter
Reply-To: mforth@greenpeace.org

To Whom it May Concern:

Banning Ranch is a very special area and it would negatively effect the community if the Coastal Commission were to allow Shell Oil, Exxon, and other companies to take the land. It is one of the last wild and open spaces left for future generations to enjoy, and is home to many threatened and rare species, such as the burrowing owl. Destroying this bit of nature will ruin the quality of life for the surrounding community in many ways.

First of all, nature is extremely important to humanity. Humans come from nature, and we need places around where we can go to remember and reestablish that connection. Not to mention, it's a great place for kids to go to learn about nature and the rare species living there.

Secondly, big oil does not need to be taking one of the last local coastal areas. They plan on creating 83 new drilling wells. In doing so, they will need to dig up the soil. This will release toxins into our atmosphere. That, combined with the fact that they are drilling, will greatly pollute the surrounding areas. We need to be doing everything we can to stop big oil and keep fossil fuels in the ground. By allowing these companies to drill, not only will it destroy the surrounding community, but it will have detrimental effects on our whole planet. Climate change is no joke, and if humans want to survive on this planet, we must do everything in our power to preserve the beautiful sources where nature has been untouched by humans.

Sincerely,

Samantha Berman

--

Mathew Forth
Orange County Campaign Coordinator
Office : [\(949\) 791-2373](tel:(949)791-2373)
Cell : [\(714\) 697-4453](tel:(714)697-4453)
Greenpeace USA, Washington, D.C.

STEPHEN B. & NOVA S. WHEELER

RECEIVED
South Coast Region

AUG 11 2016

**CALIFORNIA
COASTAL COMMISSION**

Dear California Coastal Commissioners,

We have had the incredible luck to have leased a business location on the edge of the Banning Ranch for the last 40 years. We have worked long days at this location and we have reaped the amazing bounty this piece of land has to offer throughout those years. Thousands of "knock your socks off" sunsets over Catalina Island, countless views of avian predators gliding on the bluff thermals in search of the next meal, red fox and coyote sightings, the vernal pool just inside the fence with the frogs raising their triumphant voices after a rain, and the accompanying herons dining with pleasure on the delicious appetizers! These are but a few of the secret delights the Banning Ranch has to offer. It is, indeed, a seasonal show at it's best. Everything is at the absolute height of green frenzy during the winter and spring. But it has year long attractions in full bounty as well.

I can understand why some of you felt you were looking at a dirty, dry field with nothing but oil production discarded garbage. But let me assure you that you were looking at a sleeping beauty! If you have had the chance to drive along Pacific Coast Hwy just south of the bridge across the back bay you have seen on the inland side of PCH, native plants which have reached their peak of magnificence. This is what the Banning Ranch could be if we were able to access it and make it available to the public as 100% nature preserve. AND we would be able to assure the current amazing wildlife a safe and protected place to thrive. We could arrange a minimal cleanup, use the dirt roads that exist as trails, and open it to the public to enjoy the fabulous breezes, the ocean views and all the other benefits we and a few others have gloried in for so long alone.

It is my fervent wish to share these life affirming experiences with everyone else who feels a strong desire to hark back to nature and quiet solitude as a remedy to our daily crazy fast lives!

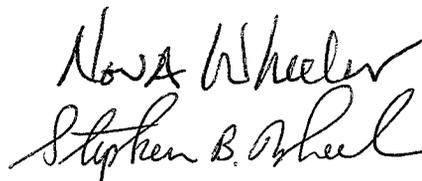
Understand that a group of us are well on our way to arranging this outcome. Please remain open to the idea that there is a definite solution that does not involve destroying the future of the living creatures on the Banning Ranch!

Everyone should share in what has been a serendipitous experience for us! Everyone should be allowed to walk everywhere on the Banning Ranch! Everyone is counting on your vision and understanding that this last open space belongs to the American public!

Please walk with us to accomplish this landslide desire to keep the Banning Ranch jewel 100% intact and open to the public!

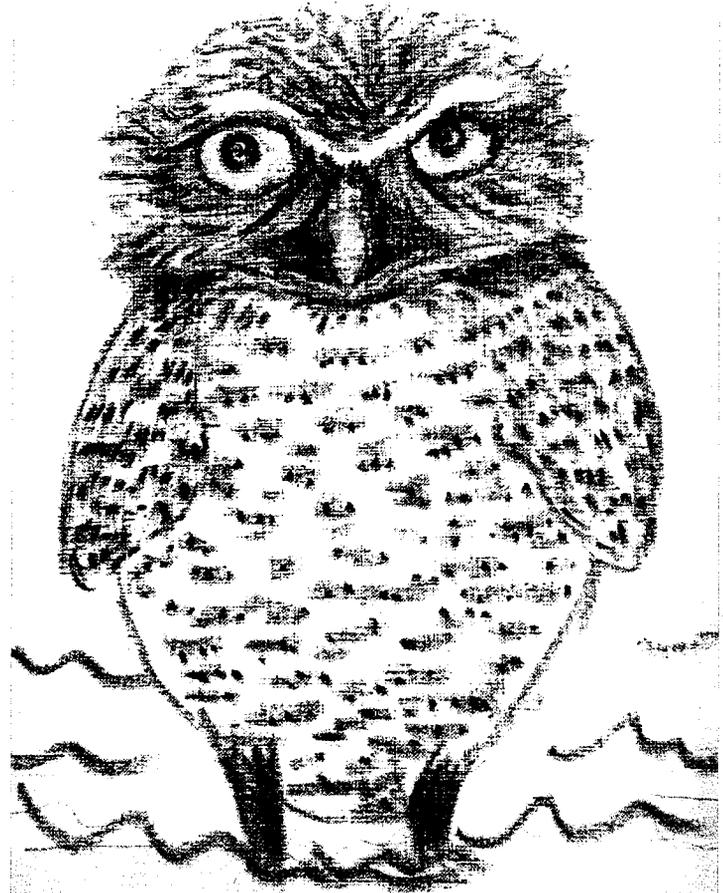
Thank you.

Nova Wheeler
Stephen B. Wheeler
Newport Beach
novawheeler@earthlink.net



527 San Bernardino Ave. Newport Beach, CA 92663-4812 Hm.Ph. (949) 646-5794
e-mail stevewheeler@earthlink.net Wk.Ph.(949) 646-3217 Fax (949) 646-3218

#DONTFOULTHEOWL



www.BanningRanch.info



Angeles Chapter
3435 Wilshire Blvd. #660
Los Angeles, CA 90010-1904
(213) 387-4287
angeles.sierraclub.org

August 18, 2016

RE: Application No. 5-15 2097 (Newport Ranch, LLC, Newport Beach) OPPOSITION

To the California Coastal Commission (CCC):

The Angeles Chapter came into being on November 1, 1911, when 75 Sierra Club members gathered in downtown Los Angeles to sign a petition calling for the creation of a "Southern California Section," the first local chapter in the history of the organization that John Muir founded in San Francisco in 1892.

Today, the Sierra Club Angeles Chapter covers Los Angeles and Orange counties and includes 16 regional groups and 27 outdoor activity sections and committees for a total of 50,000 members.

As the Sierra Club begins its second hundred years of activism for the environment, we are submitting today 869 signed petitions that express opposition to the Newport Ranch development. The Angeles Chapter membership would like the last remaining open space in Orange County to be preserved.

Sincerely,

Angélica M. González

Conservation Program Manager
Angeles Chapter Sierra Club

Sierra Club Banning Ranch Task Force Petition - Application No.5-15 2097 OPPOS

Name	Address	City/Town	S	ZIP/Post	Yes - to Save Banning Ranch
1 Lisa Selbe	1845 Anaheim Avenue	Costa Mesa	CA	92627-5012	Yes
2 Nancy Bucciarelli	111 6th st.	Huntington Beach	CA	92648	Yes
3 Patricia Goldstein	16106 Devonshire St	Granada Hills	CA	91344	Yes
4 Karen West	13224 Newport Ave	Tustin	CA	92780	Yes
5 Zain	4439 Kraft Ave	Studio City	Ca	90013	Yes
6 Denise Churchill	250 Lilac Lane	Brea	Ca	92823	Yes
7 Georgette Korsen	275 N. Ola Vista	San Clemente	CA.	92672	Yes
8 Brianne C	6218 Balcom Ave	Encino	California	91316	Yes
9 Janice Dahl		Long Beach	CA	90803	Yes
10 Meghan laurs	1611 Summit Avenue	Cardiff	California	92007	Yes
11 Roberto Uranga	1403 Angelus Ave	Los Angeles	Ca	90026	Yes
12 Benjamin Hagerty					Yes
13 Loraine Lundquist	16908 Kinzie St	Northridge	CA	91343	Yes
14 Ann Downey	25051 Sunset Pl. W	Laguna Hills	CA	92653	Yes
15 Scott M. DeLong	5417 Zelzah Avenue	Encino	CA	91316	Yes
16 Elaine Funke-Stoddard	19962 chesapeakr lane	Huntington beach	CA	92646	Yes
17 David Wilson	107 Northern Pine Loop	Aliso Viejo	California	92656	Yes
18 Joseph Dunn	1585 Chestnut Ave	Carlsbad	Ca	92008	Yes
19 David Kreitzer	18184 Verano Dr.	San Diego	CA	92128	Yes
20 Darlene Crawford	648 A Avenida Sevilla	Laguna Woods	CA	92637	Yes
21 Ronette	607 Orpheus Ave	Encinitas	CA	92024	
22 Alan Schmidt	141 Beechtree Dr	Encinitas	CA	92024	
23 lynne truong	1045 santa queta	solana beach	CA	92075	Yes
24 Maurice F Meysenburg	1561 Via Los Altos	La Habra	CA	90631	Yes
25 Peter Soria	367 Trailview Rd.	Encinitas	Ca.	92024	Yes
26 Donna Wilson	876 Buttercup Road	Carlsbad	California	92011	Yes
27 Melvin Herlin	247 Chandon	Laguna Niguel	Ca	92677-5724	Yes
28 harvey shore	6433 pAT AVE	WEST HILLS	CA	91307	Yes
29 linda oster	119421 8th place	escondido	ca	92029	Yes
30 Carly Hollas	465 south Ogden Dr.	Los Angeles	Ca	90036	Yes

31	kara heiser	5645 Fernwood Ave 10	Los Angeles	CA	90028	Yes
32	Hugh Lawrence	3481 Sitio Borde	Carlsbad	CA	92009	Yes
33	Patricia Hogan	8115 Park Hill Drive	Westchester	CA	90045	Yes
34	Donna M. Carr, M.D.	1201 Sidonia St.	Encinitas	CA	92024-2241	
35	Karen McKinzie	1660 Corte Orchidia	Carlsbad	CA	92011	Yes
36	Joan Sitnick	16974 Escalon Dr.	Encino	CA	91436	Yes
37	Judy & Joseph Fitzgerald	325 Camino Parque	Oceanside	CA	92057	Yes
38	Diane Nygaard	5020 Nighthawk Way	Oceanside	CA	92056	Yes
39	Tasha Boucher	4006 Madelia Ave	Sherman Oaks	California	91403	Yes
40	Bill Reals	28762 Bolanos	Mission Viejo	CA	92692	
41	Sonya H Davis	39017 N Habitat Circle	Cave Creek	AZ	85331	Yes
42	Beth Fainberg-Glener	283 Countryhaven Road	Encinitas	CA	92024	Yes
43	Debbie westcott	P o box 6527	Oceanside	Calif	92052	Yes
44	Margot Lowe	4834 Northerly St	Oceanside	California	92056-2101	Yes
45	Alicia Salazar	4869 Axtell Street	Los Angeles	CA	90032	Yes
46	Katie Yu	1 Portalon Ct.	Ladera Ranch	CA	93694	Yes
47	Michelle Jaufman	Pobox 4173	West hikks	Ca	91308	
48	Barbara Cohn	3521 Cay Drive	Carlsbad	CA	92010	Yes
49	Evelyn Maruko	12130 Thomas Drive	Tustin	CA	92782	Yes
50	Jessica Laemmle	319 Barbara Ave	Solana Beach	CA	92075	Yes
51	David Perkins	1664 Buttercup Road	Encinitas	CA	92024	Yes
52	Billie Remsa	7033 Surfbird Circle	Carlsbad	Ca	92011	Yes
53	Maryann Khan	3625 Vista Oceana	Oceanside	CA	92057	Yes
54	Rachel Zanetti	2578 Meadowmist Lane	Encinitas	Ca	92024	
55	Megain McKinzie	Corte	Carlsbad	CA	92011	Yes
56	Thomas Gayton	2471 Haller St.	San Diego	California	92104	Yes
57	Shannon Littrell	980 Laguna dr	Carlsbad	CA	92009	Yes
58	John Pham	1545 Hawk View Dr	Encinitas	CA	92024	Yes
59	Carol Gajewski	7034 Rockrose Terrace	Carlsbad	CA	92011	Yes
60	Kris Stewart	810 ave de san Clemente	encinitas	ca	92024	Yes
61	Beth Rosselle	6530 Torreyanna Circle	Carlsbad	CA	92011	Yes
62	Lisa Lasch	1705 Caudor street	Encinitas	CA	92024	Yes
63	Merrilee Morgan	2726 Obelisco Ct.	Carlsbad	CA	92009	Yes

64	Madeleine Peterson	3161 Alta Laguna Blvd.	Laguna beach	CA	92651
65	JESSICA CALISE	207 AVENIA MAJORCA "B"	LAGUNA WOODS	CA	92637 Yes
66	Bernard Rafacz	Park Side	Carlsbad	CA	92008 Yes
67	Andy Fesler				92008 Yes
68	Ken Clark	1518 Corte Roberto	Oceanside	CA	92056 Yes
69	Deborah Rummelhart	200 S. Sycamore #10	Los Angeles	California	90036 Yes
70	Pam Slater-Price	1844 camino Del mar	Del Mar	Ca	92014
71	Carol	3091 Buena Hills Drive	Oceanside	CA	92056 Yes
72	Bruce Montgomery	7029 Columbine Drive	Carlsbad	CA	92011 Yes
73	Alix fesler	1825 butters rd	Carlsbad	Ca	92008 Yes
74	Kim nadel	119 Mozart avenue	Cardiff	Ca	92007 Yes
75	Dean Wojak	5021 Avenida De La Plata	Oceanside	CA	92057 Yes
76	KC Reid	259 Shawnan Lane	La Habra Heights	California	90631 Yes
77	Sarah Dupree	2871 rancho Cortes	Carlsbad	Ca	92009
78	Michael McKinzie	1660 Corte Orchidia	Carlsbad	CA	92011 Yes
79	Roger Boyd	1304 Via Mil Cumbres	Solana Beach	CA	92075 Yes
80	Elva Pero	32641 Caribbean Drive	Dana Point	California	92629 Yes
81	Patricia Appel	925 Meadowlark Ln	Laguna Beach	California	92651 Yes
82	maxine hesse	805 bluffcrest ln	encinitas	ca	92024 Yes
83	Asha Sidhu	4635 Allende Avenue	Oceanside	CA	92057
84	Carolyn	904 Leonard Avenue	Oceanside	CA	92054 Yes
85	El Quinn		San Diego	CA	92130 Yes
86	Robert C. Rickert	2144 Cordero Rd	Del Mar	CA	92014 Yes
87	Lloyd Niven	4519 Wortser Avenue	Studio City	California	91604
88	J Esteban		Carlsbad		92010 Yes
89	Peter Cole	3524 Paseo De Los Americanos	Oceanside	California	92056
90	Dorcas Edge	4469 Albatross Way	Oceanside	CA	92057 Yes
91	Mickey Walker	69 Hummingbird Lane	Oceanside	CA	92057
92	Mike Bullock	1800 Bayberry drive	Oceanside	CA	92054 Yes
93	Val Sanfilippo	3246 Ashford	San Diego	California	92111 Yes
94	Mike Horn	2417 Oak Avenue	Fullerton	California	92833-3112 Yes
95	Rachael Maciel	7728 Teesdale Ave.	North Hollywood	California	91605 Yes
96	Catherine Gallagher	159 N Ivy Avenue	Monrovia	CA	91016 Yes

97 Robert deFerrante	603 Chatsworth Dr	San Fernando	California	91340	Yes
98 Hollace Wood	7137 Shoup Ave #26	West Hills	California	91307-2356	Yes
99 Margaret Bowles	4600 Santa Lucia Dr.	Woodland Hills	CA	91364	Yes
100 Carleton Parmeter	4506 West Balboa blvd	Newport Beach	Ca	92663	
101 LAVONNE GUNN	11512 Flossmoor Rd.	Santa Fe Springs	California	90670	Yes
102 Robert Reed	239 Lower Cliff Dr 9A	Laguna Beach	CA	92651	Yes
103 Lil Rostoker	23731 Via El Rocio	Mission Viejo	CA	92691	Yes
104 Doris Ojefa	3134 E Los Cerilos Drive	West Covina	CA	91791	Yes
105 Lynn Elliott	24347 Gazebo Court	Diamond Bar	CA	91765-4233	Yes
106 Vincent Vandenbosch	22525 Malden Street	West Hills	CA	91304	Yes
107 Fjaere Mooney	11500 Erwin Street	North Hollywood	CA	91606	Yes
108 Stephen J. Titus	25171 Via Piedra Blanca	Laguna Niguel	CA	92677	Yes
109 Philip Patino	4622 Pine St	Pico Rivera	California	90660	Yes
110 Leslie Fitch	223 Avenida Rosa	San Clemente	CA	92672	Yes
111 Richard Helmer	1580 Skyline Drive	Laguna Beach	California	92651	Yes
112 Matthew Schmahl	11209 Howard St.	Whittier	California	90606	Yes
113 Ryan Leemon	7 Glen Iris	Trabuco Canyon	California	92679-3704	Yes
114 Barry Katz	904 N. Spaulding Ave.	West Hollywood	CA	90046	Yes
115 John Roscoe Duncan	7520 Dunfield Avenue	Westchester	California	90045-1341	Yes
116 James Heng	25600 Maynard Drive	Calabasas	CA	91320	Yes
117 Carol Ng	960 Edgcliffe Drive	Los Angeles	CA	90026	Yes
118 Leslie Gardner-Lemus	1943 Wicks hire Ave.	Hacienda Hts.	CA	91745	Yes
119 Allan Breit	1036 N Spaulding Ave Apt 9	West Hollywood	CA	90046-6236	Yes
120 Tara Strand	11127 Hesby St. Unit 7	North Hollywood	CA	91601	Yes
121 Kent H. Badger	1950 Third Street	La Verne	California		Yes
122 Norm Briggs	1842 Iowa St	Costa Mesa	Ca	92626	Yes
123 Susan George-Rydberg	6038 Jumilla Ave	Woodland Hills	California	91367-5608	Yes
124 Sandra Rosko	5450 N Paramount Blvd	Long Beach	CA	90805	Yes
125 S. Bond		Laguna Beach	CA	92651	Yes
126 Winnette Butler	4237 Longridge Avenue	Studio City	CA	91604	Yes
127 David L. Ely	21145 Alaminos Dr	Saugus	CA	91350-1810	Yes
128 Dan Armstrong	27397 Paseo Sienna	San Juan Capistrano	CA	92675-5326	Yes
129 Richard Pass	4536 Avacado St.	Los Angeles	CA	90027	Yes

130 Maurice F Meysenburg	1561 Via Los Altos	La Habra	CA		90631	Yes
131 Kenneth Pennington	P.O. Box 1082	Santa Clarita	CA	91386-1082		Yes
132 EJ McConaughy	24452 Ladera Dr.	Mission Viejo	California		92691	Yes
133 Paula Hollie	3024 B Calle Sonora	Laguna Woods	CA		92637	Yes
134 Karin Yehling	13697 Badger Ave	Sylmar	CA		91342	Yes
135 Deborah Wood	23841 Pinafore Circle	Laguna Niguel	CA		92677	Yes
136 Robert Lyons	16 Garza Ct.	Rancho Mission Viejo	CA		92694	Yes
137 Linds taffet	3386 Barcelona	Dana point	Ca		93629	Yes
138 Craig Galloway	15009 Moorpark St 104	Sherman Oaks	California		91403	Yes
139 Carla zuckerman	25612 Oakbar Ct	Newhall	Ca		91321	Yes
140 Miranda	4950 Coldwater Cyn	Sherman Oaks	California		91423	Yes
141 Terri Fuqua	2253 Republic Ave	Costa Mesa	CA		92627	Yes
142 T Collier		Long Beach				Yes
143 Tim Ryan	34522 via verde	capistrano beach	CA		92624	Yes
144 Dennis	4872 Llano Dr	Woodland Hills	CA		91364	Yes
145 Gwen Romani	28667 Meadowgrass Drive	Castaic	California		1384	Yes
146 Wendy Leece	1804 Capetown	Costa Mesa	Ca		92627	Yes
147 Steve kassel	26016 Salinger lane	Stevenson ranch	CA		91381	Yes
148 Tom Campbell	12823 Kling St., #5	Studio City	CA	91604-1130		Yes
149 LaTrenda Hayden	1950 W. 92nd St.	Los Angeles	California		90047	Yes
150 Helene zimmerman	1425 11th st	Santa monica	Ca		90401	
151 Deborah Shields	860 Bluebird Canyon Dr.	Laguna Beach	CA		92651	Yes
152 Melvyn Nefsky	13701 Marina Pointe Dr. #129	Marina Del Rey,	Ca		90292	Yes
153 John Sefton	20462 Rose Canyon Rd	Trabuco Canyon	CA		92679	Yes
154 Kevin Walt	32812 Rosemont Drive	Trabuco Canyon	California	92679-3388		Yes
155 Ed Maurer	24001 Salero Lane	Mission Viejo	CA		92691	
156 Katherine Wright	4 Titian	Aliso Viejo	CA		92656	Yes
157 paul carlton	3280 paseo gallita	san clemente	ca		92672	Yes
158 Sharon Soeler	4201 Topsnga Canyon Blvd	Woodland Hills	CA		91364	
159 Louise Ratliff	.13232 Norris Ave.	Sylmar	CA		91342	Yes
160 Gerry Strickland	405 W. Ave. Lobos Marinos	San Clemente	CA.		92672	Yes
161 Pamela merriam	27140 hidawayave	Canyon country	Ca		91351	
162 William Kramer	28242 Yanez	Mission Viejo	California		92692	Yes

163 Rich Toyon	2444 Los Olivos Lane	La Crescenta	CA	91214	Yes
164 Kimberly Scibetta	9645 Wheatland Avenue	Shadow Hills	Ca	91040-1427	Yes
165 Ike Rodman		West Hills	CA	91307-5219	Yes
166 Nancy Flores					
167 william atkins	263 San Joaquin st	Laguna Beach	CA	92651	Yes
168 Lorri Goldman	2441 W Orangethorpe Av #208	Fullerton	California	92833	Yes
169 Stephanie J Tanton	28261 San Marcos	Mission Viejo	California	92692	Yes
170 Sally Newell	2147 Ronda Granads	Laguna Hills	CA	92637	
171 Hillary Ostrow	5835 Hesperia Ave	Encino	CA	91316	Yes
172 Drew Meseck	190 sunset terrace	Laguna beach	Ca	92651	
173 Theodore C. Snyder	12726 Daryl Avenue	Granada Hills	CA	91344-1062	Yes
174 Kevin O'Brien	294 Chiquita St	Laguna Beach	CA	92651	Yes
175 Carol Becker	14257 Roblar Place	Sherman Oaks	CA	91423	Yes
176 Lauren					
177 Doreen pagano	9625 Park St., #7	Bellflower	CA	90706	Yes
178 Chris Johnson	22646 Vose St.	West Hills	California	91307	Yes
179 Robert Dodds	521 S Reese Pl	Burbank	Ca	91506	Yes
180 Marcia Rodd	12315 Tiara St.	Valley Village	CA	91607	Yes
181 Veronique Swett	28822 Tow	Laguna Beach	Ca	92651	Yes
182 Pamela Adams	1493 Morningside Drive	Laguna Beach	CA	92651	Yes
183 Andrew Barchilon	2008 N ALVARADO ST	Los Angeles	CA	90039	Yes
184 James P. Higgins	10153-1/2 Riverside Drive #598	North Hollywood	CA	91602-2165	Yes
185 John Beynon	13428 Park Street	Whittier	CA	90601	Yes
186 Penny Elia	30632 Marilyn Drive	Laguna Beach	CA	92651	Yes
187 Vincent Campisi	15386 Rhododendron Dr	Canyon Country	CA	91387-1851	Yes
188 Veronica Tucker	4115 New York Ave.	La Crescenta	California	91214	Yes
189 Mary Melissa Stoughton	9 Via Tortuga	Rancho Santa Marga	ca	92688	Yes
190 Lisa Marks	31522 Eagle Rock Way	Laguna Beach	CA	92651	Yes
191 Gretchen North	5140 Teesdale Ave	Valley Village	CA	91607	Yes
192 Joyce Greene		Claremont	CA	91711	Yes
193 Gregory Wright	14161 Riverside Drive, #3	Sherman Oaks	California	91423	Yes
194 Clairann Venable	19539 Stagg St	Reseda	CA	91335	Yes
195 Peter Volz	7131 Farralone Ave Unit 48	Canoga Park	CA	91303	Yes

196 Jason Haller	1134 Mira Mar ave	Long Beach	CA	90804	Yes
197 Garrett	23459 Welby Way	West Hills	CA	91307	Yes
198 Melissa DeGraw	6563 Tamarind St.	Oak Park	Ca	91377	Yes
199 Peter Gavin	23562 Lipari	Laguna Hills	CA	92653	Yes
200 Karla Edwards	23515 Lyons Avenue	Santa Clarita	CA	91355	Yes
201 Cori Tite	15819 Larkspur St	Sylmar	California	91342	Yes
202 Ken Windrum	160 S. Gramercy Pl., #206	Los Angeles	CA	90004-4913	Yes
203 Cynthia Maxwell	24875 Mulholland Hwy	Calabasas	CA	91302	Yes
204 Denise Churchill	250 Lilac Lane	Brea	Ca	92824	Yes
205					Yes
206 Robert Wallace	13712 Sunrise Dr.	Whittier	CA	90602	Yes
207 David Erikson	23871 stillwater Lane	Laguna Niguel	CA	92677	Yes
208 Charles La Rue	414 S Indian Hill Blvd Apt 32	Claremont	California	91711-5232	Yes
209 Richard Packer	24679 Park Miramar	Calabasas	CA	91302	Yes
210 Mark Betti	3490 Coy Drive	Sherman Oaks	CA	91423	Yes
211 Thomas Reichert	6066 W Studio Court	Los Angeles	CA	90038	Yes
212 Thomas Strout	13633 Philadelphia St.	Whittier	CA	90601	Yes
213 Jane Steven	24032 Rail Circle	Laguna Niguel	CA	92677	
214 linda black	25972 dana bluffs east	capo beach	CA	92624	Yes
215 Diana Williams	2466 Calle Aquamarina	San Clemente	California	92673	Yes
216 Jaynee Lisa Thorne	16040 Chase Street	North Hills	California	91343	
217 Gabriel Amaro	24701 Raymond Way	Lake Forest	California	92630	Yes
218 Maryann LaNew	12 Corte Loarre	San Clemente	CA	92673	
219 rebecca kelly	5513 west 120th street	inglewood	ca	90304	Yes
220 Anita Frost	28541 Roosevelt Ave.	Castaic	CA	91384	Yes
221 Richard L Dorman	3909 Ceanothus Pl	Calabasas	Ca	91302	Yes
222 Christine R Riley	1300 Adams Ave Apt 12P	Costa Mesa	CA	92626	Yes
223 Franklin Munguia	2199 Junipero Avenue	Signal Hill	CA	90755	Yes
224 sheila wyse	14925 jadestone drive	sherman oaks	California	91403	Yes
225 Charles Buck	27081 Mission Hills Dr.	Sab Juan Capistrano	CA	92675	Yes
226 Leila Zaharopoulos	8841 Megan Ave	West Hills	CA	91304	Yes
227 suzanne narducy	94 mira adelante	san clemente	ca	92673	Yes
228 maria gritsch	8854 lookout mountain ave	los angeles	ca	90046	Yes

229 Sharyl Swink	10826 Louise Avenue	Granada Hills	CA	91344	Yes
230 Laurie Manners	8354 Oso AVenue	Winnetka	CA	91306	Yes
231 Pat Ballew	6149 Riverton Ave	North Hollywood	CA	91606	Yes
232 Donna Erie	1321 E. Grand AVe	El Segundo	CA	90245	Yes
233 Paul Dapkus	1140 Glen View Dr.	Fullerton	CA	92835	Yes
234 michael pou	P.O. Box 3412	san dimas	CALIFORNI	91773	Yes
235 Peter Wurr	2206 McNab Ave	Long Beach	CA	90815	Yes
236 Harlan Lebo	PO Box 614	La Mirada	CA	90638	Yes
237 Wayne Smith	28021 Sarabande Lane	Santa Clarita	CA	91387	Yes
238 Dianne Wash	5412 Mezzanine Way	Long Beach	Ca	90808	Yes
239 KELLY KRAMER	11431 KATHY LN	GARDEN GROVE	CA	92840	Yes
240 Erin Chin	5 Hancock	Irvine	California	92620	Yes
241 Steve Smith	1638 Via Tulipan	San Clemente	CA	92673	Yes
242 Peter Gevorkian	15342 Cambay Lane	Huntington Beach	CA	92649	
243 m Salama		Fountain Valley		92708	Yes
244 Ray Bartlett	17858 La Lima Ln	Fountain Valley	Ca	97208	Yes
245 natalie fogarty	12 summerwind court	newport beach	ca	92663	Yes
246 Marilyn Garibaldi	5871 Carbeck Dr.	Huntington Beach	CA	92648	Yes
247 LouAnn Steinwand	1214 Warren St	Placentia	CA	92870	Yes
248 jan stark	10192 wembley cir	westminster	California	92683	Yes
249 Donna Specht	22221 Wood Island Lane	Huntington Beach	CA	92646	Yes
250 theresa brady	21844 corvo way	topanga	ca	90290	Yes
251 Joan Jones Holtz	11826 The Wye St.	El Monte,	California	91732	Yes
252 Deborah Young	1250 Roosevelt Lane	Laguna Beach	CA.	92651	Yes
253 Ashley Dos Santos	21772 Seaside Lane	Huntington Beach	Ca	92646	Yes
254 Bert Moldow	3503 A bahia Blanca W	Laguna Woods	CA	92637	Yes
255 madeline kuo	7 elderberry	irvine	CA	92603	Yes
256 Rochelle Chacon	4 La Salle Lane	Ladera Ranch	CA	92694	Yes
257 Thomas E Gee	1000 E Oceanfront, Apt 5	Newport Beach	CA	92661	Yes
258 Tim Corbin	4821 King Cir Apt A	HUNTINGTON BEACH	CA	92649	Yes
259 David Schwab	17315 Santa Maria St.	Fountain Valley	CA	92708-3121	Yes
260 Kristina Borchardt	5631 Camp at	Cypress	Ca	90630	
261 Elizabeth Flowers	22502 Platino	Mission Viejo	California	92691	Yes

262 Cheryl Gough	9902 Lapworth Cir	Huntington Beach	California	92646	Yes
263 terri wiley	503 E. Avenida Magdalena	San Clemente	Ca.	92672	Yes
264 Stella Gunther	302 Tropea Aisle	Irvine	Ca	92606	Yes
265 Garen	310 E. Providencia #212	Burbank	CA	91502	Yes
266 Joseph Powell	18736 Ashford Lane	Huntington Beach	CA	92648	Yes
267 Nancy Riley	PO Box 28891	Santa Ana	CA	92799	Yes
268 Jessica Norton	5400 Seashore Drive	Newport Beach	CA	92663	Yes
269 Martha Herrero	153 The Masters Circle	Costa Mesa	California	92627	Yes
270 Katie Arthur	400 Cabrillo Street	Costa Mesa	Ca	92627	Yes
271 Jay Schneider	831 E Orangewood Ave	Anaheim	CA	92802	Yes
272 Thomas Woodson	2700 Peterson Please 57D	Costa Mesa	CALIFORNI	92626	Yes
273 Helen wright	33372 big sur	Dana point	Ca	92629	
274 Jim Stewart	1720 Chestnut Ave # 17	Long Beach	CA	90813	Yes
275 Liga Auzins	12842 Safford E	garden grove	CA	92840	Yes
276 Anne Cox	505 Mountain Rd	Laguna Beach	Ca	92651	Yes
277 Jo Zhou			CA	92614	Yes
278 Michael Stevenson	28861 Calabria Drive	Agoura Hills	CA	91301-2118	Yes
279 Chanelle	2310 Florida Street	Huntington Beach	CA	92648	Yes
280 Deborah Green	29 Arrowhead	Irvine	CA	92618	Yes
281 Erik James	25600 Maynard Dr.	Malibu	CA	91302	Yes
282 Deanne Renfro	28593 Malabar Road	Trabuco Canyon	California	92679	Yes
283 Laura Smith	21321 Fleet Ln.	Huntington Beach	ca	92646	Yes
284 Marie McDonald	27850 Lassen St	Castaic	CA	91384	Yes
285 Jane Elliott	13682 Wheeler Pl	Tustin	CA	92780	Yes
286 Gail Osborne	6204 Vista del Mar	Playa del Rey	California	90293	Yes
287 Carol Sadowski	PO Box 41686	Long Beach	CA	90853	Yes
288 Chaz Shields	403 W 7th St	Long Beach	CA	90813	Yes
289 Anthony Baumgartner	1901 Fern Lane	Glendale	Ca	91208	Yes
290 marie luebbers	14201 cherrywood lane	tustin	ca	92780	Yes
291 ingrid mueller	1050 doreen place #3	venice	ca	90291	Yes
292 Michael Mavrovouniotis	14 Sunriver	Irvine	CA	92614	Yes
293 Annette Mercer	2647 Glendon Ave	Los Angeles	Ca	90064	Yes
294 Marilyn Schroeder	26336 Golada	Mission Viejo	CA	92692	Yes

295 Michelle Paster	1750 Kelton Ave	Los angeles		90024	Yes
296 Karen Osmundson	143 W 5th St	Watsonville	CA	95076	Yes
297 Desirae Zingarelli-Sweet	9400 La Tijera Blvd #1134	Los Angeles	CA	90045	Yes
298 Clary Neil	1343 E Verness St	west Covina	CA	91790	Yes
299 Janet Nippell	1052 E Howard St	Pasadena	CA	91104	Yes
300 Richard Horne	1045 Garfield Ave	Venice	CA	90291-4934	Yes
301 Jay Schneider	831 E Orangewood Ave	Anaheim	CA	92802	Yes
302 sandy	7118 trask ave	Playa Del Rey	ca	90293	Yes
303 lynn	23642 via potes	mission viejo	ca	92691	Yes
304 Nicole Marter	24917 Smokewood Way	Stevenson Ranch	Ca	91381	Yes
305 Dorle Wood		Walnut	CA	91789	Yes
306 barbara roller	28830 calabria dr.	agoura hills	ca.	91301	Yes
307 Saran Kirschbaum	1710 Bagley Ave.	Los Angeles	CA	90035	Yes
308 Leslie Silton	1318 L. Ron Hubbard Way	Los Angeles	CA	90027	Yes
309 janice c. smith	PO Box 245	lucerne	California	95458-0245	Yes
310 lee	2501 beverley ave #8	santa monica	ca	90405	
311 Darlene Rueda					Yes
312 Diana Driskill	320 Granada Avenue	Long Beach	California	90814	Yes
313 Katie Sanders	24821 Bent Tree Lane	Lake Forest	CA	92630	Yes
314 Leonard Way	1634 Nausika Ave.	Rowland Heights	CA	91748	Yes
315 Sheila Willens	3140 Chandelle Road	Los Angeles	CA	90046	Yes
316 Renata Rivero	1221 Cameo Ln	Fullerton	CA	92831	Yes
317 Dennis Landi	946 Maine Ave.	Long Beach	California	90813	Yes
318 Kaye mann	Via Mariposa east	Laguna woods	Ca	92637	Yes
319 Marianne Tornatore	1068 Calle del Cerro	San Clemente	CA	92672	Yes
320 Albert Eurs	10456 Hampshire Court	Cypress	CA	90630	Yes
321 Jon Guilaroff	5532 W 117th St.	Inglewood	CA	90304	Yes
322 Bjorg Gudjons			Ca	92679	Yes
323 Ashley Elizabeth Allen	1269 Chestnut Ave	Long Beach	California	90813	Yes
324 Emily Taylor	3644 1/2 Mentone Ave	Los Angeles	California	90034	Yes
325 Eileen Taschereau	1952 18th St Apt C	Santa Monica	CA	90404	Yes
326 Fredrick Page	2865 E. pacific Coast Hwy.	Newport Beach	CA	92625	Yes
327 Kelly Greene	1901 Delaware Avenue	Santa Monica	California	90404	Yes

328	Jim Yarbrough	574 Garfield Ave.	South Pasadena	CA	91030	Yes
329	Steve Alford	527 E. 1st St.	Long Beach	California	90802	Yes
330	Sharon Washington	11829 Eldridge Ave.	Lake View Terrace	CA	91342	Yes
331	Sharon Barnes	16110 Ventura Blvd.	Encino	CA	91436	
332	Sylvia De Baca	718 Via Los Santos	San Dimas	Calif	91773	Yes
333	Susan Kent	7547 March Avenue	West Hills	CA	91304	Yes
334	Kaye B Eshnaur	12573 Woodgreen St	Los Angeles	California	90066	Yes
335	daniele	via elia lombardini	rome		148	Yes
336	Sarah korda	2208 westridge rd	Los angeles	CA	90049	Yes
337	Linda Springer	129 California St	Arcadia	CA	91006	Yes
338	Christopher Klapp	1840 N Van Ness Ave	Los Angeles	CA	90028	Yes
339	Lee Baldwin	11532 Liggett St.	Norwalk	CA	90650	Yes
340	Rene Suarez	6464 San Marcos Way	Buena Park	CA	90620-3008	Yes
341	Llyn Parker	5702 Beck ave	North Hollywood	California	91601	Yes
342	Margaret Hunter	9150 Gallatin Road	Downey	California	90240	Yes
343	Mark Gallegos	2711 Boulder St	Los Angeles	CA	90033	Yes
344	Yolanda Trujillo		Anaheim	CA	92807	Yes
345	Mary Franz	1395 Cerritos Dr	Laguna Beach	CA	92651	Yes
346	Nina G Rosenfield	1545 Umeo Road	Pacific Palisades	CA	90272	Yes
347	Karen Osmundson	143 W 5th St	Watsonville	CA	95076	Yes
348	Karen Gerloff	1715 Merion Way	Walnut	CA	91789	Yes
349	Janet Howell	484 S. Euclid Ave.	Pasadena	CA	91101	Yes
350	Lionel Mares	12032 Neenach Street	Sun Valley	CA	91352	Yes
351	Judith	760 Swarthmore	Pacific Palisades	CA	90272	
352	duVergne Gaines	433 S. Beverly Drive	Beverly Hills	CA	90212	Yes
353	Susan P. Walp				91103	Yes
354	joan fish	3733 allred	lakewood	CA	90712	Yes
355	Nanette Duff Sullivan	18839!Celtic St	Porter Ranch	CA	91326	Yes
356	Carolyn Seeman	11747 Otsego Street	Valley Village	CA	91607-3220	Yes
357	Patty Ripley	33951 Alcazar Drive	Dana Point	CA	92629	Yes
358	Beth Hodge	23016 Lake Forest Dr. #A115	Laguna Hills	CA	92653	Yes
359	Cheryl DeSautell	330 Cordova, #254	Pasadena	CA	91101	
360	Albert Valencia	15542 Cabot Circle	Huntington Beach	California	92647	Yes

361 Michael Decker	10259 Tujunga Cyn Blvd	Tujunga	CA	91042	Yes
362 Rodger Benson	364 Cliff Drive	Laguna Beach	California	92651	Yes
363 Elmer Anderson	3684 Virginia Rd.	L. A.	CA	90016	
364 susan suntree	1223 11th Street	santa monica	ca	90401	Yes
365 Tom Sanchez	2250 Dorris Place	Los Angeles	CA	90031	Yes
366 Anne Logan	2435 N Maple Grove Road	ORANGE	CA	92867	Yes
367 Jack O.		Laguna Beach	CA	92651	Yes
368 Laura Hough	3325 Bagley Ave	Los Angeles	CA	90034	Yes
369 Diana Pash	3271 Easter Circle	Huntington Beach	CA	92649	Yes
370 Jessica Landon	40 S. Chestnut Place	Long Beach	CA	90802	Yes
371 Jennifer Toth	19842 Holly DR	Santa Clarita	CA	91350	Yes
372 Anik Charron	13336 Maxella Avenue	Marina del Rey	Ca.	90292	Yes
373 Thomas M Woodson	2700 PETERSON PL APT 57D	COSTA MESA	California	92626	Yes
374 Jane Matthews	1345 North Fuller Ave. #303	Los Angeles	CA	90046	Yes
375 Laura Herndon	3311 W. Alameda Ave	Burbank	California	91505	Yes
376 Olga		Cm	CA	92627	Yes
377 tes	taerae	adfdafdf			Yes
378 Jay Schneider	831 E Orangewood Ave	Anaheim	CA	92802	Yes
379 Penny Elia	30632 Marilyn Drive	Laguna Beach	CA	92651	Yes
380 George Watland	3435 Wilshire Blvd Suite 660	Los Angeles	California	90010	Yes
381 Garen Yegparian	310 E. Providencia #212	Burbank	CA	91502	Yes
382 Celia Kutcher	34681 Calle los Robles	Capistrano Beach	CA	92624-1524	Yes
383 Ross S. Heckmann	1214 Valencia Way	Arcadia	California	91006	Yes
384 Darrell Clarke	158 S. Madison Ave. #102	Pasadena	CA	91101	
385 Angelica Gonzalez	1317 S. Hamilton Blvd	Pomona	CA	91766	Yes
386 Rebecca Holzer	8766 Tulare Drive 404H	Huntington Beach	CA	92646	Yes
387 mark vella	204 south sparks st	burbank	ca	91506	
388 Jan Snedegar	31151 Ceanothus Drive	Laguna Beach	CA	92651	Yes
389 Carey Tri		Chatsworth	CA	91311	Yes
390 Noemi Pacheco	15341 Moccasin St.	la Puente	CA	91744	Yes
391 Natasha M. Arnoldi	5432 Lemona Avenue	Sherman Oaks	CA	91411	Yes
392 Patricia Appel	925 Meadowlark Ln	Laguna Beach	California	92651	Yes
393 Kaye Kittrell	P.O. Box 1602	Pacific Palisades	CA	90272	Yes

394 Sandra Nealon	735 Balboa Ave	Laguna Beach	CA	92651	Yes
395 Victoria Wolfe	3729 MOUND VIEW AVE	STUDIO CITY	California	91604	Yes
396 Cheryl Elaine Betson	5485 E the toledo	LONG BEACH	California	90803	Yes
397 Sylvia Miller	11324 1/2 Morrison Street	North Hollywood	CA	91601	Yes
398 Marc Woersching	P.O. Box 4471	Valley Village	Calif.	91617	
399 Lucille Robustelli	33891 Calle de Bonanza	San Juan Capistrano	CA	92675	Yes
400 Tim					Yes
401 Micahel	23530 Lampara Drive	Valencia	California	91355	Yes
402 jeff wilson					
403 Leslie Stojka	2934 1/2 Beverly Glen Circle	Los Angeles	CA	90077	Yes
404 V. Bandas		San Gabriel		91776	Yes
405 Elisa Lamont	7435 Quinn St.	Downey	CA	90241	Yes
406 Nelson Molina	8157 Cyclamen Way	Buena Park	CA	90620	Yes
407 eric ramos	11432 South St.	Cerritos	CA	90703	Yes
408 Eric Dickey	232 Nieto Ave	Long Beach	CA	90803	Yes
409 Roselva Ungar	20349 Jay Carroll Dr.	Santa Clarita	CA	91350	Yes
410 Katherine Cook	620 W. Lambert Rd.	La Habra	California	90631	Yes
411 Karen Stone	25031 Silverleaf Lane	Laguna Hills	California	92653	Yes
412 Ren Navez	3541 Redwood Ave	LA	CA	90066	Yes
413 Kathy Knight	1122 Oak St.	Santa Monica	CA	90405	Yes
414 Julie Criss-Hagerty	23644 Via Clasico	Valencia	CA	91355	Yes
415 isaac	621 W 7th St	upland	ca	91786	Yes
416 Carole DaDurka	3716 Calle Casino	San Clemente	CA	92673	Yes
417 Ana Porcellino	19816 Terri Drive	Santa Clarita	CA	91351	Yes
418 Elaine Kluever	9042 Veronica dr	Huntington Beach	California	92646-3439	
419 Bill Schoene	1519 Oak Street	Santa Monica	California	90405	Yes
420 Diane & Cliff Slawson	2078 Phalarope Ct	Costa Mesa	Ca	92626	Yes
421 Beth Schaefer	2720 Cunard St	Los Angeles	CA	90065	Yes
422 Sera Benjamin	110 E Avenida	San Clemente	CA	92672	Yes
423 Shalimar Wijay	13101 Sunnybrook Circle #202	Garden Grove	Ca	82844	
424 Bonnie Strand	1210 N. Kenilworth Ave.	Glendale	CA	91202	Yes
425 Harry	22431 Lombardi	Laguna Hills	CA	92653	Yes
426 Ken Gould	10336 Wilshire Blvd	Los Angeles	CA	90024-4753	Yes

427 Charles Bainer	35 Saddleridge	Aliso Viejo	CA	92656-1927	Yes
428 Lawrence Michael Steen	1633 S. Shenandoah St.	Los Angeles	CA	90035	Yes
429 Thea Izzo	11410 Dolan Avenue	Downey	CA	90241	Yes
430 Phoebe Liebig	4420 Elenda Street	Culver City	CA	90230	Yes
431 Elaine S. Kamil, MD	2810 Forrester Drive	Los Angeles	California	90064	Yes
432 Ric Garrison	41210 11th St. West	Palmdale	CA	93551	Yes
433 Dorle Wood		Walnut	CA	91789	Yes
434 Sandra McCanne	33781 Avenida Calita	San Juan Capistrano	CA	92675-4905	Yes
435 Michael Waldorf	2 Bali Lane	Pacific Palisades	California	90272	Yes
436 Jay Matchett	14801 Newport Ave	Tustin	Ca	92780	Yes
437 Maureen McGee	790 Alma Real Drive	Pacific Palisades	CA	90272	Yes
438 Wayland Augur	1315 E. Balboa Blvd	Newport Beach	CA	92661	Yes
439 Laura Dupuis	2255 Cheremoya Ave.	Los Angeles	ca	90068	Yes
440 Maimon Leavitt M.D.	210 Woodruff Ave.	Los Angeles	CA	90024	Yes
441 Agnes Dickson	5 Segura	Irvine	CA	92612	Yes
442 Becky Arntzen	3377 Canton Lane	Studio City	CA	91604	
443 Ruth Bromund	24612 Gilmore St.	West Hills	CA	91307	Yes
444 bernard resnick	3611 serra rd	malibu	California	90265	Yes
445 David Weinstein	9509 Heather Rd.	Beverly Hills	CA	90210	
446 Martha Herrero	153 The Masters Circle	Costa Mesa	CA	92627	Yes
447 Michael & Diane McGrath	12101 Bradford Place	Granada Hills	Ca.	91344-2322	Yes
448 David Wilson	107 Northern Pine Loop	Aliso Viejo	California	92656	Yes
449 Meredith E. Potter	1738 Purdue Ave	Los Angeles	Ca	90025	Yes
450 Ronee Reece	155 N. Occidental Blvd	Los Angeles	CA	90026	Yes
451 Jill Franzke	19809 Londelius St.	Northridge	California	91324	Yes
452 Carly Hollas	18 Corniche Dr unit A	Dana Point	Ca	92629	Yes
453 Sherry D Winston	14208 DICKENS ST APT 3	SHERMAN OAKS	CA	91423-4115	Yes
454 janis buckingham	2351 garfield ave	altadena	California	91001	Yes
455 Barton A Bean	23236 Via Bahia	Mission Viejo	CA	92691	Yes
456 Jeanette Vosburg	4124 east blvd	Los Angeles	Ca	90066	Yes
457 Maurice A, Warrenj	198 Avenida Majorca Unit G	Laguna Woods	California	92637	
458 Steffan Miller	201 S Grisly Canyon Drq	Orange	CA	92869	Yes
459 Nathan Boris	27281 Via Burgos	Mission Viejo	CA	92691	Yes

460	Ravin Carlson	117 Avenida Lucia	San Clemente	CA	92672	Yes
461	Wayne Smith	28021 Sarabande Lane	Santa Clarita	California	91387	Yes
462	Tanya Wilson				91202	Yes
463	michelle korbel	520-A iris ave	corona del mar	ca	92625	Yes
464	Howard Strong	P.O. Box 570092	Tarzana	CA	91357-0092	Yes
465	Rita Robinson	378 Ruby St.	Laguna Beach	California	92651	Yes
466	Gary Uyekawa	604 E. 220th St. #6	Carson	California	90745	Yes
467	Irene Gabriel-Thomas	1141 Glen Arbor Ave	Los Angeles	CA	90041	Yes
468	Chanel A Davis	5606 Sunlight Place	Los angeles	Ca	90016	Yes
469	pamela rogers	10015 Alondra Blvd	Bellflower	CA	90706	Yes
470	Andrea Marr	317 Cabrillo St, Apt A	Costa Mesa	California	92627	Yes
471	Iris Edinger	5534 Pattilar Ave.	Woodland Hills	CA	91367	Yes
472	Charles Beals	6611 McLennan Avenue	Van Nuys	CA	91406	Yes
473	Stephanie elm					Yes
474	Kathryn paddock	5386 Jed smith rd	Hidden hills	CA	91302	Yes
475	Bob Pickell	249 Tivoli Dr	Long Beach	CA	90803	Yes
476	Christine Hearst	66 Corniche Drive #C	Dana Point	CA	92629	Yes
477	Charlene Mason Gallego	11525 Mount Gleason Ave	Tujunga	California	91042	
478	Carol Elkind	3947 Landmark Street	Culver City	California	90232	Yes
479	Leslie Broyles	20820 Rodax Street	Winnetka	CA	91306	Yes
480	Joan Kahn	2181 El Molino Avenue	Altadena	CA	91001	Yes
481	Douglas Snyder	1570 Via Capri, Apt 2	Laguna Beach	CA	92651	Yes
482	Nancy Alderman	19623 LORNE Street	Reseda	CA	91335	Yes
483	gary barker	5417 cedarhaven dr.	agoura hills	ca	91301	Yes
484	Dave Huber	647 Camino de Los Mares	San Clemente	CA	92673	Yes
485	Elizabeth Stack	22603 Pacific Coast Hwy #813	Malibu	CA	90265	Yes
486	Summer Marasco	1644 Iowa Street #A	Costa Mesa	CA	92626	Yes
487	Randall Ross	12747 Riverside Dr	Valley Village	CA	91607	Yes
488	Dianna Linden	1220 California Ave. #16	Santa Monica	CA	90403	Yes
489	Maryann LaNew	12 Corte Loarre	San Clemente	CA	92673	Yes
490	Linda Strong	335 Ridge Terrace Ln	Montebello	CA	90640-2062	Yes
491	Martha Krainin	25211 Summerhill Lane	Stevenson Ranch	CA	91381	
492	Duane Welsch	619 Alden Road	Claremont	CA	91711	Yes

493 Junko Yoshimura	22941 Audrey Ave	Torrance	CA	90505	Yes
494 Andrew Mackenzie	11543 venice Blve.	Los Angeles	CA.	90066	Yes
495 alison merkel	5 meadowlark lane	oak park	ca	91377	No
496 Lisa Reeber	7401 Lubao Ave	Winnetka	California	91306	Yes
497 Andreea Boca	5805 Lemona Ave.	Sherman Oaks	CA	91411	Yes
498 suzanne Darweesh	2104 N. Hilltop Court	fullerton	CA	92831	Yes
499 Rachel Huang		Duarte	CA	91010	Yes
500 Kevin Kostiuk	462 N Marengo Ave.	Pasadena	CA	91101	Yes
501 Greg Klinger	12133 Mitchell Ave.	Los Angeles	CA	90066	Yes
502 Sally Sharp	8235 Garden Grove Ave.	Reseda	CA	91335	Yes
503 Bettie Pearson	8614 Foothill Blvd., Apt. 106	Sunland	CA	91040	Yes
504 jerry persky	859 princeton street	santa monica	california	90403-2217	Yes
505 Marilyn Perona	5372 Punta Alta	Laguna Woods	CA	92637-2587	Yes
506 Daren Black	11664 National Blvd., #125	Los Angeles	CA	90064	
507 Diana	11 Niguel Pointe Drive	Laguna Niguel	CA	92677	Yes
508 Debra Lichstein	5610 Buffwood Place	Agoura Hills	CA.	91301	
509 Patricia J. Crother	1119 Westchester Place	Los Angeles	CA	90019-3523	Yes
510 Robert Munsey	8100 Kelvin Ave.	Winnetka	CA	91306	Yes
511 Mack errea	15 Anacapri	Laguna niguel	ca	92677	Yes
512 Joseph R Seals Jr	2405 Bobby Lane	Santa Ana	CA	92706	Yes
513 Scott Pearlman	18545 Vallarta Dr	Huntington Beach	CA	92646	Yes
514 Richard Heredia	1304 S. Primrose Ave	Alhambra	CA	91803	Yes
515 Beverly Johnson	31176 Calle San Pedro	San Juan Capistrano	CA	92675	Yes
516 Michelle Arend-Ekhoff	1203 E. 8th St.	Long Beach	CA	90813	
517 Bruce Enos	10733 Kelmore St	Culver City	CA	90230	Yes
518 robert keenan	23392 bolivar	mission viejo	ca	92691	Yes
519 Beth Burdick	1145 Chautauqua Blvd.	Pacific Palisades	CA	90272	Yes
520 Sharon Haywood	3045 Bern Dr.	Laguna Beach	Ca.	92651	
521 Mary Alice Wuerz	27432 Abanico	Mission Viejo	California	92691	Yes
522 Ann Rushton	4159 Stansbury Ave.	Sherman Oaks	CA	91423	Yes
523 Susan Hanger	20940 Waveview	Topanga	CA	90290	Yes
524 Lynne Irvine	847 Muskingum Ave	Pacific Palisades	CA	90272	Yes
525 Jill Fischer	7131 Farralone Ave.	Canoga Park	California	91303	Yes

526 Gillian Smith	1550 N. Fairfax Avenue	Los Angeles	CA	90046	Yes
527 Susan Temple	3470 Carfax ave	Long Beach	CA	90808	Yes
528 Eric Johnson	245 Verbena Lane	Brea	California	92823	Yes
529 Erin Munavu	10953 Rathburn Ave	porter ranch	CA	91326	Yes
530 Carol Becker	14257 Roblar Place	Sherman Oaks	CA	91423	Yes
531 Robert Lyons	16 Garza Ct.	Rancho Msn Viejo	CA	92694-1804	Yes
532 lisa edmondson	3438 mentone av#1	los angeles	CA	90034	Yes
533 Marsha	871 S. New Hampshire Ave. #1	Los Angeles	California	90005	
534 Sunya felburg	2275 W25th St., #28	San Pedro	Calif.	90732	Yes
535 Karen Gerst	1030 N. Kenwood Street	Burbank	CA	91505	Yes
536 Karen Redding	847 Newport Ave	Long Beach	CA	90804	Yes
537 Shalimar Wijay	13101 Sunnybrook Circle #292	Garden Grove	Ca		
538 nancy Vaughan	24895 Via Larga	Laguan Niguel	ca	92677	Yes
539 Hweiju Yu	1244 Valley View Rd,	Glendale	ca	91202	Yes
540 Michael Chernick				90046-3408	Yes
541 George L Holloway	25251 Carson Way	Stevenson Ranch	CA	91381	Yes
542 Thomas Gee	1000 E Oceanfront, Apt 5	Newport Beach	CA	92661	Yes
543 Kenneth	6 Buckskin Ct.	Bell Canyon	CA	91307	Yes
544 Atam Singh	295 Nieto Ave	Long Beach	CA	90803	Yes
545 Charles Turner	10033 Glade Ave.	Chatsworth	CA	91311-3608	Yes
546 Kathy Zelaya	337 W California Ave.	Glendale	Ca	91209	Yes
547 Laura Strom				90034	Yes
548 Jay	831 E Orangewood Ave	Anaheim	CA	92802	Yes
549 linda black	25972 dana bluffs east	capo beach	Choose a S	92624	Yes
550 Andi Klein	5700 Wilshire Blvd.	Los Angeles	CA	90036	Yes
551 Chris Hamon	29385 Shell Cv	Laguna Niguel	CA	92677	Yes
552 Christyne Byron	23 Pemberton Pl.,	Laguna Niguel	CA	92677	
553 Elaine Brown	11445 Skyland Rd	Sunland	CA	91040	Yes
554 Wendell Covalt	351 Paseo de Gracia	Redondo Beach	CA	90277	Yes
555 Eve Gordon	5708 Chimineas Ave	Tarzana	CA	91356	Yes
556 patt healy	403 san vicente blvd	santa monica	ca	90402	Yes
557 Susan young	1100 Glendon	Los Angeles	Ca	90024	Yes
558 Lizette leclerc	1906 s. Shenandoah st. Apt. 6	Los Angeles	Ca	90034	

559 Anthony Andreoli	26 Sunswept Mesa	Aliso Viejo	California	92656	Yes
560 Gloria Sefton	PO Box 714	Trabuco Canyon	CA	92678	Yes
561 Barbara Maxwell	3008 Mulberry Avenue	Fullerton	CA	92835	Yes
562 Linda Stock	3408 Stoneridge Court	Calabasas	CA	91302	Yes
563 Rose Mozingo	14831 Greenbrae	Irvine	CA	92604	Yes
564 Veda Veach	11260 Overland Ave. 2F	Culver City	CA	90230	Yes
565 price	po box 2462	Huntington Beach	CA	92647	Yes
566 Gaye Simmons	220 29th Street	Hermosa beach	CA	90254	Yes
567 jill thraves	3562 laurelvale drive	studio city	CA	91604	Yes
568 Linda Cowgill	2231 20th St. #1	Santa Monica	CA	9040t	Yes
569 David Scharf	2100 Loma Vista Place	Los Angeles	CA	90039	Yes
570 Theresa DeMott-Rizzo	P.O. Box 272	Trabuco Canyon	CA	92678	Yes
571 Robert Trueblood	14103 chestnut st	Whittier	Ca	90605	Yes
572 Rich Waters	P O Box 415	Culver City	CA	90232	Yes
573 Christine Devor	4965 Reforma Rd	Woodland Hills	CA	91364	Yes
574 Iris Lovelace	3377 1/2 Brayton Ave	Signal Hill	CA	90755	Yes
575 Peter Gavin	23562 Lipari	Laguna Hills	CA	92653	Yes
576 Bill Reals					Yes
577 Teri Rasmussen	9 Windflower	Coto De Caza	CA	926794714	Yes
578 Stella Rose	POB 57405	Sherman Oaks	Ca	91413	Yes
579 Dalia Rhule	6420 Indiana Ave.	Long Beach	CA	90805	Yes
580 Lili Flanders	2301 Manning Ave.	Los Angeles	CA	90064	Yes
581 Megan kliethermes	3686 S. Centinela ave	Los Angeles	CA	90066	Yes
582 Jerome Lubin	984 S Carmelina Ave	Los Angeles	CA	90049-5808	Yes
583 Matthew Lax	27617 Nugget Dr., #5	Canyon Country	CA	91387	Yes
584 John Perez	8210 Bellingham Ave	North Hollywood	CA	91605	Yes
585 Joan Weaver					Yes
586 Marty Essex	12030 Valleyheart Drive	Studio City	CA	91604	Yes
587 Jeffrey Anne Jones		550 Los Angeles	CA	90049	Yes
588 Toni Schaaf	31752 Via Perdiz	TrabucoC anyon	CA	92679	Yes
589 Mary Patterson	10418 Gothic Avenue	Granada Hills	CA	91344	Yes
590 thomas dempsey	433 north camden drive ste 73	(beverly hills	ca	90210	Yes
591 Sara Hyatt	P.O. Box 1024	Corona Del Mar	Ca	92625	Yes

592 Allen Nelson	15962 Gault St.	Lake Balboa	CA	91406	Yes
593 Dolores Sloan	1813 9th Street #1	Santa Monica	CA	90404	Yes
594 Tim Murphy	10061 Riverside Dr. , Ste 309	Burbank	CA	91602	Yes
595 Dr Philip Glaser	25501 Camino Los Padres	Laguna Niguel	Ca	92677	Yes
596 Eric Morse	4933 Indian Wood Road	Culver City	CA	90230	Yes
597 Margaret Davies	24449 Madeira Way	Laguna Niguel	CA	92677-3534	
598 Ed Wright	18034 Ventura Blvd	Encino	Ca.	91316	No
599 Saran Kirschbaum	1710 Bagley Ave.	Los Angeles	CA	90035	Yes
600 Celia Arroyo	1111 E. Artesia Bl	Compton	California	90221	Yes
601 Tim Taylor	2330 Camden Ave.	Los Angeles	CA	90064	Yes
602 peggy O'Neil-Rosales	3509 Lewis Avenue	Long Beach	CA	90807	Yes
603 Moktar Salama	10185 Peregrine Cir	Fountain Valley	CA	92708	Yes
604 Mary Phillips	8411 23rd st.	Westminster	California	92683-3352	
605 Jan Brown	7822 Broadleaf Avenue	Van Nuys	CA	91402	Yes
606					Yes
607 Eleanor Espensen	2266 27th St.	Santa Monica	CA	90405	
608 Susanne K Upshaw	1944 Comstock Ave	Los Angeles	CA	90025-5109	Yes
609 randy perez	10140 woodward ave	sunland	ca	91040	Yes
610 Arlene Zimmer	1615 Caddington Drive	Rancho Palos Verdes	CA	90275	Yes
611 Carl Kugel	1137 2nd St.	Santa Monica	CA	90403	Yes
612 Susan P. Walp	1234 El Mirador	Pasadena	CA	91103	Yes
613 joan diane donatelli	2269 beverly glen place	los angeles	ca	90077	Yes
614					Yes
615 Anne Shapiro	4849 Ellenwood Dr	Los Angeles	CA	90041	Yes
616 Paul Waller	23428 Canzonet St.	Woodland Hills	CA	91367	Yes
617 Joan Schipper	6100 Cashio Street	Los Angeles	California	90035	Yes
618 dave alexander	10459 artesia blvd #92c	bellflower	ca	90706-6805	Yes
619 Jonathan West	2286 Crestview Circle	Brea	California	92821	Yes
620 Ronald Brusha	1400 Cleveland Road	Glendale	California	91202	Yes
621 David Leroi	12669 Rose Ave.	Los Angeles	CA	90066	Yes
622 Gwen	28667 Meadowgrass Drive	Castaic	CA	91384	Yes
623 Carolyn and Richard Rosenst	2194 Century Hill	Los Angeles	CA	90067	Yes
624 Ed Costello	620 e channel rd	Santa monica	Ca	90402	Yes

625 Robert Thomas	9710 Armley Ave	Whittier	CA	90604	Yes
626 Alexander Ward	2409 Cloverfield Blvd	Santa Monica	CA	90405	Yes
627 McTighe		Mission Viejo	CA	92691	Yes
628 David Eder	1658 Kaweah Dr	Pasade	CA	91104	Yes
629 Jennifer Teschner	15409 Cohasset Street	Van Nuys	CA	91406	Yes
630 Robin Williams	21192 Jasmynes Way	Lake Forest	CA	92630	
631 a miller	1528 19th	santa monica	CA	90404	Yes
632 Vera Lawrence	4106 Fulton Avenue	Sherman Oaks	CA	91423	Yes
633 Gregory Kuntz	2696 Fair Oaks Ave Unit B	Altadena	CA	91001	Yes
634 Rebekah Jorgensen	1222 S. Hudson Ave.	Los Angeles	CA	90019	Yes
635 Josanne Farkas	12030 Valleyheart Drive #101`	Studio City	CA	91604	Yes
636 Reid Johnson	10492 Colina Way	Los Angeles	CA	90077	Yes
637 Sander Greenland	22333 SWENSON DR	TOPANGA	CA	90290	Yes
638 Edith Wander	2122 Camden Avenue	Los Angeles	California	90025	Yes
639 L Bogue	26622 Granvia Dr	Mission Viejo	CA	92691	Yes
640 Shady Hakim	2507 28th Street, #1	Santa Monica	CA	90405	Yes
641 William Leavh	1164 W Venton St	San Dimas	Ca.	91773	
642 Joan Green	26351 Oak Plain Dr.	Santa Clarita	CA	91321	
643 Robert deFerrante	603 Chatsworth Dr	SF	CA	91340	
644 Sharon Lipman	2208 Via Caliente	Fullerton	California	92833	Yes
645 Vincent Shulda	31342 W Nine Dr	Laguna Niguel	California	92677	Yes
646 Linda Reavely	4924 Auckland Ave.	N. Hollywood	CA	91601	Yes
647 David Harralson	3629 Lakershim Blvd	StudioCity	California	91604	Yes
648 Lawrence E Giffen Jr	16 Via Onagro	Rancho Santa Marga	California	92688	Yes
649 Thomas Johnson	3012 Clearwood Court	Fullerton	Ca	92835	Yes
650 Catherine Kermer	11116 Culver Blvd	Culver City	CA	90230	Yes
651 Frank Hanrahan	2545 FAIRWAY DR	COSTA MESA	CALIFORNI	926271311	Yes
652 Henry Lichstein	544 Dryad Rd	Santa Monica	CA	90402	Yes
653 Katherine Wright	4 Titian	Aliso Viejo	California	92656	Yes
654 Fjaere Mooney	11500 Erwin St	North Hollywood	CA	91606	Yes
655 Diane Knight	22801 Marlin Pl	West Hills	CA	91307	Yes
656 Kevin O'Brien	294 Chiquita St	Laguna Beach	CA	92651	
657 Neal Steiner	2706 Castle Heights Pl	Los Angeles	CA	90034	Yes

658 Michael Fishbein	1638 Granville Ave., Apt. 6	Los Angeles	CA	90025	Yes
659 Pamela Perryman	2025 Le Droit Dr	South Pasadena	Ca	91030	Yes
660 Susan Erickson	24025 Arroyo Park Drive Unit 1	Valencia	CA	91355	Yes
661 Sarah Browder	1146 N Central Ave #107	Glendale	CA	91202	Yes
662 Nancy Riley	PO Box 28891	Santa Ana	California	92799	Yes
663 Janet H. Probst	2240 University Drive	Newport Beach	CA	92660	Yes
664 Joel Stone	3702 Park Lane	Newport Beach	CA	92663	Yes
665 BRANDI JONES	12561 pine street	garden grove	California	92840	Yes
666 Thomas Saito	915 E. Santa Anita Ave.	Burbank	CA	91501	
667 deborah gregory	11816 lindblade st.	culver city	ca	90230	Yes
668 Sally White	26242 Park View Road	Valencia	CA	91355	Yes
669 Sean Eckols	246 N Fairview st	Burbank	CA	91505	Yes
670 Sherry Vatter	3362 Keystone Ave., Apt. 2	Los Angeles	CA	90034	Yes
671 Howard Strauss	3836 Bentley Avenue #2	Culver City	CA	90232	Yes
672 Patty Cornell	1405 Golden Gate Ave	LA	CA	90026	Yes
673 Maury Swoveland	23761 Saint Elena	Mission Viejo	CA	92691	Yes
674 rose mary cushman	19191 Harvard Ave Apt 251D	Irvine	CA	92612	Yes
675 Anna Dermenchyan	7715 Coldwater Canyon Ave	North Hollywood	CA	91605	Yes
676 Lloyd Niven	4519 Wortser Avenue	Studio City	California	91604	Yes
677 Barney Schlinger	21442 Encina Rd	Topanga	CA	90290	Yes
678 Loraine Lundquist	16908 Kinzie St	Northridge	CA	91343	Yes
679 Kenadi le	13750 Bessemer Street	Van Nuys	California	91401	Yes
680 Gerry Phillips	5401 Magnolia Ave.	Whittier	CA	90601	Yes
681 bruce hirayama	3637 military ave	los angeles	ca	90034	
682 Nancy Shaw	4049 Lyceum Ave.	Los Angeles	California	90066	
683 Margee Hills					Yes
684 Missy	1460 Forestview Dr	Brea	CA	92821	Yes
685 Gina Lee	411 Sturtevant dr.	SIERRA madre	Ca	91024	
686 Janet VanEtten	261 W Marquita apt 2	San Clemente	California	92674	Yes
687 Sandra Cutuli	13605 Valerio Street	Van Nuys	Ca	91405	Yes
688 Michelle Hoskinson					Yes
689 Charles Lourtie	16661 McFadden Ave Apt 30	Tustin	CA	92780	Yes
690 John steele	10737 Crebs Ave	Northridge	CA	91326	Yes

691	barbara heitz	1656 country club drive	Glendale	CA		91208	Yes
692	Karl Kraves	515 gretna green way	los angeles	ca		90049	Yes
693		6227 Kenwater Ave.	Woodland Hills	ca		91367	Yes
694	Joan Jones Holtz						
695	Mary Ellen Strote	11826 The Wye St.	El Monte	CA		91732	Yes
696		475 Stunt Road	Calabasas	CA		91302	
697	Judy Smith						Yes
698	Dr. Mha Atma S. Khalsa	826 Wildrose Drive	Brea	CA		92821	
699	Mary Smith	1536 S Crest Dr	Los Angeles	CA	90035-3314		Yes
700	Mihai Giurgiulescu	4035 Lyceum Ave	Los Angeles	CA		90066	Yes
701	Diane London	12800 Waddell St	North Hollywood	CA		91607	Yes
702		PO BOX 7071	Woodland Hills	CA		91365	Yes
703	Lynn Sentenn						
704	Denis Pettitt	1626 Wardman Dr	Brea	CA		92821	Yes
705	Linda Goetz	1046 North Screenland Drive	Burbank	CA	91505-2501		Yes
706	Mauro Ferrero	1030 W Huntington Dr Apt 16	Arcadia	California		91007	Yes
707	Tasha Boucher	7831 Stewart Ave	Los Angeles	California	90045-1055		Yes
708	Adrienne Altman	4006 Madelia Ave	Sherman Oaks	CA		91403	Yes
709	Susan Gallant	15035 Otsego St	Sherman Oaks	CA		91403	Yes
710		3018 N Naomi St	Burbank	CA		91504	Yes
711	Jeanne Karpenko						Yes
712	k. hafer	1230 E. Windsor Rd Apt 409	Glendale	CA 91205		91205	Yes
713		405 granada	san clemente	ca		92672	Yes
714	Gail Malmuth						Yes
715	James J. Provenzano					90210	Yes
716	Jesse S. Abrams	3438 Merrimac Road	Los Angeles	CA		90049	Yes
717	Marcia Howard	2 Silkgrass	Irvine	CA		92614	Yes
718	William Brandt	211 S. Spalding Drive	Beverly Hills	Ca		90212	Yes
719	Lee Baldwin	27665 West Elk Ridge Road	Castaic	CA		91384	Yes
720	Daryl Gale	11532 Liggett St.	Norwalk	CA		90650	Yes
721	MATT PAKUCKO	PO Box 24387	Los Angeles	CA		90024	
722	Garry E McCoppin	19410 KILFINAN ST	PORTER RANCH	CA		91326	Yes
723	Dr Randy	31 BIRDIE LN	COTO DE CAZA	CA - Califo		926794927	Yes

724	Roberta McCarty	17000 Ventura Blvd	Encino	ca	91355	Yes
725	Shelley Strohm	5468 B Paseo del Lago East	Laguna Woods	CA	92637	Yes
726	Melissa DeGraw	1520 Butler Ave.	Los Angeles	CA	90025	Yes
727	Rebecca Harper	6563 Tamarind St	Oak Park	Ca	91377	
728	Arthur Martinot	2616 Cordelia Rd	Los Angeles	CA	90049-1220	Yes
729	Bridget G Webb	1835 Winmar drive	Los angeles	CA	90065	
730	SEAWAN KOO	28931 Canyon Oak Drive	Trabuco Canyon	CA	92679	Yes
731	Teira Johnson	25544 Crockett Ln	Stevenson Ranch	CA	91381	No
732	David Ellisor	3873 Don Tomaso Dr	Los Angeles	California	90008-5313	Yes
733		33776 Colegio Dr.	Dana Point	CA	92629	Yes
734	Margaret Hunter					Yes
735	Amber Tidwell	9150 Gallatin Road	Downey	California	90240	Yes
736	Phillip Randall	2420 1/2 N. Beachwood Dr	Los Angeles	CA	90068	Yes
737	Wendy Miller	22549 Berdon Street	Woodland Hills	California	91367	Yes
738		31 Sycamore Canyon Dr	Dove Canyon	CA	92679	Yes
739	joann lombardo					Yes
740	Gabriela Sosa	2916 Clay Street	Newport Beach	CA	92663	Yes
741	BOBETTE HALVERSON	1900 Dracena Dr #4	LA	CA	90027	Yes
742	joan and ingolf klengler	6180 BUSCH DR	MALIBU	CA	90265	Yes
743	Arlene Encell	1426 randall st	glendale	ca	91201	Yes
744	katherine watson	2535 Armacost Ave,	Los Angeles	CA	90064	Yes
745	Ann D. Scelba	2401 buckeye	newport beach	California	92660	Yes
746	Theresa Naumann	24406 McBean Parkway	Valencia	CA	91355	Yes
747	julie pearce	18620 Citronia Street	Northridge	CA	91324	
748	Edward Goldstein	6789 Quail Hill Pkwy, #338	Irvine	CA	92603	Yes
749	Shannon Matheson	19826 Superior Street	Chatsworth	CA	91311	Yes
750	Amber hergen	3521 Moore Street	Los Angeles	CA	90066	Yes
751	Laurie Manners	11259 la maida st	north hollywood	CA	91601	Yes
752		8354 Oso Avenue	Winnetka	CA	91306	Yes
753	carolyn shaw					Yes
754	Anita Frost	8467 brier drive	los angeles	CA	90046	Yes
755	Hillary Ostrow	28541 Roosevelt Ave.	Castaic	CA	91384	Yes
756	Donna Velarde	5835 Hesperia Ave	Encino	California	91316	Yes

757	howard henry	460 Cypress Street	Laguna Beach	California	92651	Yes
758	Michele Pennington	1300 Adams Ave	Costa Mesa	California	92626	Yes
759	Scott & Terri Dunlap	274 Sherwood Street	Costa Mesa	CA	92627	Yes
760	Carole Biloki	11441 Biona Drive	Los Angeles	CA	90066	Yes
761	john kirkup	13730 Annandale st #30-A	Seal beach	CA	90740	Yes
762	Petrea Sandel	20445 lassen st	chatsworth	ca	91311	Yes
763	Kathy Green	551 Eldora Road	Pasadena	CA	91104	Yes
764	Mark DiMaria	3 Sand Dollar Ct	Newport Beach	Ca	92663	
765	Kimberly Zamlich	9037 West 24th Street	Los Angeles	California	90034-1938	Yes
766	Lorna Paisley	18828 Mountain Dale court	Newhall	California	91321	Yes
767	Dina Fisher	6952 Balboa Blvd	Lake Balboa	CA	91406-4557	Yes
768	Rob Seltzer	9340 Ventura Way	Chatsworth	California	91311	Yes
769	Joanna Drury	18408 Clifftop Way	Malibu	CA	90265	Yes
770	Heidi Buech					
771	Peter Volz	12940 walsh ave	los angeles	CA	90066	
772	Deborah Evans	7131 Farralone Ave Unit 48	Canoga Park	CA	91303	Yes
773	Jeffrey Powell	9 Russel lane	Laguna Niguel	CA	92677	Yes
774	Elaine Lebowitz	3218 Highland Ave #C	Santa Monica	CA	90405	
775	Tara Strand		Los Angeles	CA	90035	Yes
776	Theodore C. Snyder	11127 Hesby St.	North Hollywood	CA	91601	Yes
777	Kathryn Hauser	12726 Daryl Avenue	Granada Hills	CA	91344-1062	Yes
778	Nancy L young	234 CALLE CUERVO	SAN CLEMENTE	California	92672	Yes
779	Louise Ratliff	827-O Via Alhambra	Laguna Woods	CA	92637	Yes
780		13232 Norris Ave.	Sylmar	CA	91342	Yes
781	Robert Ivatt					Yes
782	Shoshana Paige	28689 Pietro Drive	Valencia	Ca	91354	
783	Cindy Loomis	19456 Calvert Street	Tarzana	CA	91335	Yes
784	Anetta Stark	1021 16th St	Santa MOnica	CA	90403	Yes
785	Andrew Sugerman	16633 Ventura Blvd.	Encino	CA	91436	Yes
786	Nicholas Lombardo	Dixie Canyon Ave	Sherman Oaks	CA	91423	
787	susan strickland	22019 Brie Ct.	Newhall	CA	91321	Yes
788	David Davies		6663			Yes
789	Kim bingaman	PO Box 6936	Beverly Hills	CA	90212	Yes

790 Drew Irby	15608 Marina Ct	Canyon Country	Ca		91387
791 Wendy Nelson	26855 VIA SAN JOSE	Mission Viejo	CA	92691-1812	Yes
792 Sarah Hays	17333 osborne St	Northridge	CA		91325 Yes
793 Christine R Riley	10509 Blythe Avenue	Los Angeles	CA		90064 Yes
794	1300 Adams Ave Apt 12P	Costa Mesa	CA		92626
795 Donnal Poppe					Yes
796 Arthur Seidelman	17045 Osborne St	northridge	California		91325 Yes
797	2311 Roscomare Rd	Los Angeles	Ca		90077 Yes
798 Jerry Taylor					Yes
799 marie boker	3515 E Colorado St	Long Beach	CA		90814 Yes
800 Linda Ledger	901 wilshire blvd	santa monica	CA		90401 Yes
801 scott	25842 Via Del Rey	San Juan Capistrano	CA		92675 Yes
802 ANN COFIELD GARDNER	28391 el sur	laguna niguel	ca		92677 Yes
803 Nancy S. Young	1034 J ROYAL OAKS DRIVE	Monrovia	California		91016 Yes
804 Robert T Odenberg	19200 Nordhoff St., 1104	Northridge	CA		91324 Yes
805 Libby Parro	29900 Forest Cove Lane	Agoura Hills	Ca		91301 Yes
806 Gayle	6441 Cavan	Huntington Beach	CA		92647 Yes
807 Timothy corbin	P.o. Box 2021	Rpv	Ca		90274 Yes
808 Pam watanab	4821 king circle unit A	Huntington Beach	CA		92649 Yes
809 Michele Grey	1766 w silverlake dr	Los angeles	Ca		90026 Yes
810 Sylvia A. Mata	3022 Fall Avenue	Los Angeles	CA		90026 Yes
811 Junko Takeya	142 N. Pritchard Ave	Fullerton	Ca		92833 Yes
812	22449 Birds Eye Dr.	Diamond Bar	CA		91765 Yes
813 Albert Valencia					Yes
814 Wendy Wifler	15542 Cabot Circle	Huntington Beach	California		92647
815 Shelley Brown	42 almador	Irvine	California		92614 Yes
816 Amanda Pennington	2115 S. Victoria Ave.	Los Angeles	CA		90016 Yes
817 gregory hall	212 29th Street Apt B	Newport Beach	CA		92663 Yes
818 Randall Lake	1462 forest av	pasadena	ca		91103 Yes
819 Taylor Ingram	633 Milan Ave	South Pasadena	CA		91030 Yes
820 Andrew Olsen	4101 W 133rd St	Hawthorne	CA		90250 Yes
821 Gail McMullen	4440 FINLEY AVE	Los Angeles	CA		90027 Yes
822 Janell Julian	1734 N Kingsley Dr #4	Los Angeles	CA		90027 Yes

823 Sharon Lee Koch	3259 Cabo Blanco Dr.	Hacienda Heights	CA	91745	Yes
824 Samuel Rametta	4250 Park Newport	Newport Beach	CA	92660	Yes
825 Jessica Mayfair	2485 Irvine Ave Apt 2	Costa Mesa	Ca	92627	Yes
826 Vanessa Andronaco	15404 Princeton St.	Santa Monica	CA	90404	Yes
827 Dr. Mha Atma S. Khalsa	4 Paseo Del Sol	Rancho Santa Marga	CA - Califo	92688	Yes
828 Michael L. Sandler	1536 S Crest Dr	Los Angeles	CA	90035-3314	Yes
829	1739 Federal Ave. #303	Los Angeles	California	90025	Yes
830 Rene Suarez					Yes
831 John Goodman	6464 San Marcos Way	Buena Park	CA	90620-3008	Yes
832 terence pearce	1027 Domador	San Clemente	CA	92673	Yes
833 Miguel Samaniego	3810 wade st	los angeles	CA	90066	Yes
834 Marian Carter	326 El Camino del Mar	Laguna beach	California	92651	Yes
835	2149 E Norma Avenue	West Covina	CA	91791	Yes
836 Robert & Michelle Rivers					Yes
837 Barbara Mitchell	1560 Orange Ave	Costa Mesa	Ca	92627	Yes
838 Krista Pierson	2193 Santa Ana Ave	Costa Mesa	CA	92627	Yes
839	PO box 15614	Newport Beach	CA	92659	Yes
840 Misha Askren					Yes
841 Lynn Holland	1354 S.Curson Ave.	Los Angeles	CA	90019	Yes
842 Jan	730 N Whitnall Hwy	Burbank	CA	91505	Yes
843 Sherri Gallagher	605 San Michel Dr S.	Costa Mesa	CA	92627	
844 Ingrid	7650 E Big Canyon Dr	Anaheim	California	92808	Yes
845 Kathleen Engberg		Midway City	Ca	92655	Yes
846 Linda Trevillian	5432 Canehill Ave.	Lakewood	California	90713-1618	Yes
847 Jeff Levy	2216 Westminster Avenue	Alhambra	CA	91803	Yes
848 Jessica Wodinsky	3552 Kallin ace.	Long Beach	Ca	90808	Yes
849	12601 Everglade	Los Angeles	Ca	90066	Yes
850 Deborah Shields					Yes
851 Aprille Harris	860 Bluebird Canyon Dr.	Laguna Beach	CA	92651	Yes
852	29621 Via Cebolla	Laguna Niguel	CA	92677	Yes
853 Jane Nachazel					Yes
854 lee jordan	1844 Effie Street	Los Angeles	CA	90026	Yes
855 Sabrina Holland	6224 condon ave	los angeles	ca	90056	Yes

856 Saul Velazquez	3726 Santa Fe Village Dr.	Santa Ana	CA	92704	Yes
857 Gerald Kelly	1622 N. Leeds Ave.	Ontario	California	91764	Yes
858 Merilie Robertson	1137 18th St.	Santa Monica	California	90403	Yes
859	24308 Shrewsbury Circle	Canoga Park	CA	91307	Yes
860 willy aenlle					Yes
861 Denise Sacks	573 alameda st	altadena	CA	91001	Yes
862 Suzanne Deerlyjohnson	8650 Gulana	Playa Del Rey	CA	90293	yes
863 Craig Galloway	2121 Locust Ave	Long Beach	CA	90806	Yes
864 Sharon Gekko	15009 Moorpark St	Sherman Oaks	CA	91403	Yes
865 yvonne galvez	613 Via Golondrina	San Clemente	CA	92673	Yes
866 Laura Herndon	31 montgomery	mission viejo	ca	92692	Yes
867 Gregory Morse	3311 W. Alameda Ave #F	Burbank	CA	91505	Yes
868	57 Savona Walk	Long Beach	CA	90803	Yes
869 Angelica Gonzalez					Yes



Angeles Chapter
3435 Wilshire Blvd. #660
Los Angeles, CA 90010-1904
(213) 387-4287
angeles.sierraclub.org

August 1, 2016

**Application No. 5-15-2097 (Newport Banning Ranch, LLC, Newport Beach) –
OPPOSITION**

To the California Coastal Commission (CCC):

Founded by legendary conservationist John Muir in 1892, the Sierra Club is now the nation's largest and most influential grassroots environmental organization -- with more than two million members and supporters.

The Sierra Club Banning Ranch Park and Preserve Task Force was founded in 1999 as part of the Angeles Chapter of the Sierra Club, with the mission of preserving the entire Banning Ranch as open space.

This letter concerns the applicant's proposal to conduct fuel modification activities in Environmentally Sensitive Habitat Area (ESHA) buffers.

The Sierra Club opposes this, as ESHA buffers are meant to provide a natural buffer around ESHA. Section 30240(b) of the Coastal Act states:

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

The letter submitted to the Commission by biologist Robert Hamilton reviewed some of the ecological and practical conflicts between fuel modification zones and ESHA buffers. For example, the provision of irrigation will create conditions ideal for the invasive Argentine ant and for other exotic pest species; and repeated clearing of brush to maintain fire-safe spacing will encourage invasion of the cleared areas by exotic grasses and weeds that will spread into adjacent areas. The reality is that, once fuel modification zones are identified, the Fire Department requires those zones to be maintained in whatever condition *they* consider necessary to maintain public safety. Years from now, the critically important ecological considerations that seem to be at the forefront at this moment – when the applicant is attempting to convince the Commission to change its policy – almost certainly will have been forgotten. *At best*, they will

have been relegated to a secondary concern, far behind the mandate to protect public safety in an area the Newport Beach Fire Department ranks as having the highest risk for fire danger.

It is largely for these reasons that the Coastal Commission has generally interpreted Section 30240(b) of the Coastal Act as requiring fuel modification activities to be placed outside the ESHA buffer. For example, the City of Malibu Local Coastal Plan (LCP) Land Use Plan, adopted by the CCC on September 13, 2002 states, on page 41:

The LUP policies establish the protection of areas adjacent to ESHA and adjacent to parklands through the provision of buffers. Natural vegetation buffer areas must be provided around ESHA or parkland that are of sufficient size to prevent impacts that would significantly degrade these areas. Development, including fuel modification, shall not be permitted within required buffer areas.

Consider, as well, the Santa Monica Mountains LCP, certified by the CCC in October 2014. On page 23, fuel modification is allowed in a 100' "Quiet Zone" which is located outside the 100' H1 (similar to ESHA) habitat buffer:

"New non-resource-dependent development shall also provide an additional 100-foot "Quiet Zone" from H1 habitat where feasible (measured from the outer edge of the 100-foot H1 habitat buffer required above). New development is not permitted in the H1 habitat Quiet Zone except resource-dependent uses, non-irrigated fuel modification required by the Fire Department for lawfully-established structure."

Throughout the State of California, exceptions to the rule are rare and limited in extent. See, for example, Page 13 of April 2005 CCC staff report for the Brightwater/Bolsa Chica project:

With regards to the currently proposed Brightwater project, it is the opinion of the Commission's staff ecologist that limited fuel modification within a limited portion of the ESHA buffer, if it were first widened to be sufficiently protective, could be allowed consistent with Section 30240 of the Coastal Act. If the Eucalyptus ESHA buffer is widened to 328 feet (100 meters) the applicant's proposed restricted plant palette and permanent irrigation could be allowed only within the first 50 feet nearest the proposed residential lots. This area is called Zone B Ecotone Management area on the applicant's "Conceptual Plan Plant Palette for Open Space and ESHA Buffer" (Exhibit 4). Temporary (3-5 years), above ground irrigation could be allowed throughout the buffer for plant establishment. Mowing could also be allowed within the buffer in the 50 feet nearest the residential lots. The 50 foot wide area south of Zone B may also be mowed, if necessary but the plant palette would need to be unrestricted and must contain species appropriate to a native California grassland community in coastal Southern California. No other fuel modification practices would be allowed within the ESHA buffer.

Thus, at Brightwater, a limited amount of fuel modification was permitted within the ESHA buffer, *but only after the width of that buffer had been expanded to 328 feet*. The request by NBR at Banning Ranch, to permit broad overlap between ESHA buffers and fuel modification zones throughout the development area, would set a completely different precedent.

In the case of Banning Ranch, the CCC has made it crystal clear from its initial communication with the City of Newport Beach that fuel modification was to be conducted in the development footprint, and not in the ESHA buffer. In a 2009 letter from the CCC, commenting on the Notice

of Preparation for the expected Environmental Impact Report (EIR) for the proposed Banning Ranch development project, the position of the CCC was clearly stated:

Fuel modification requirements to address fire hazard should be set back (outside of buffers) so that the buffer areas serve their intended function of protecting ESHA from the disruption of habitat values.

The position that fuel modification should occur in the development footprint, and not in the ESHA buffer, was restated several times in the May 2016 staff report, both in the biology memos and the conditions of approval. Specifically, Condition 7.A.1 states:

No fuel management zones shall take place within areas identified as ESHA, Wetlands, or buffers.

Conclusion: The Sierra Club strongly urges the CCC to deny the applicant's request to conduct fuel modification within ESHA buffers. The applicant has been made aware that fuel modification must be placed entirely within the development footprint from the very beginning. The Banning Ranch ecosystem supports numerous listed or otherwise highly sensitive wildlife species. Allowing fuel modification to broadly overlap with ESHA buffers would not only compromise the ecological integrity and viability of the various forms of ESHA identified at Banning Ranch, but it would also set a very bad precedent applicable to numerous other projects up and down the coast of California.

Sincerely,

A handwritten signature in black ink, appearing to read "George Watland". The signature is fluid and cursive, with a large initial "G" and "W".

George Watland
Sr. Chapter Director
Sierra Club Angeles Chapter

From: [Terry Welsh](#)
To: [Dobson, Amber@Coastal](#); [Schwing, Karl@Coastal](#); [Sarab, Sherilyn@Coastal](#); [Ainsworth, John@Coastal](#); [Willis, Andrew@Coastal](#); [Engel, Jenna@Coastal](#); [Dixon, John@Coastal](#); [BanningRanchComments@Coastal](#); [Henry, Teresa@Coastal](#)
Cc: [Steve Ray](#)
Subject: Banning Ranch Fuel Modification
Date: Tuesday, July 05, 2016 12:45:16 AM
Attachments: [Response to fuel mod.pdf](#)

To the CCC staff:

Attached is a letter from the Banning Ranch Conservancy which addresses fuel modification on Banning Ranch and specifically addresses a recent letter from City of Newport Beach Fire Chief Steve Poster.

Please don't hesitate to contact me if you have any questions or comments.

Thank you for your time and consideration,

Terry Welsh
Banning Ranch Conservancy
714-719-2148

7-2-16

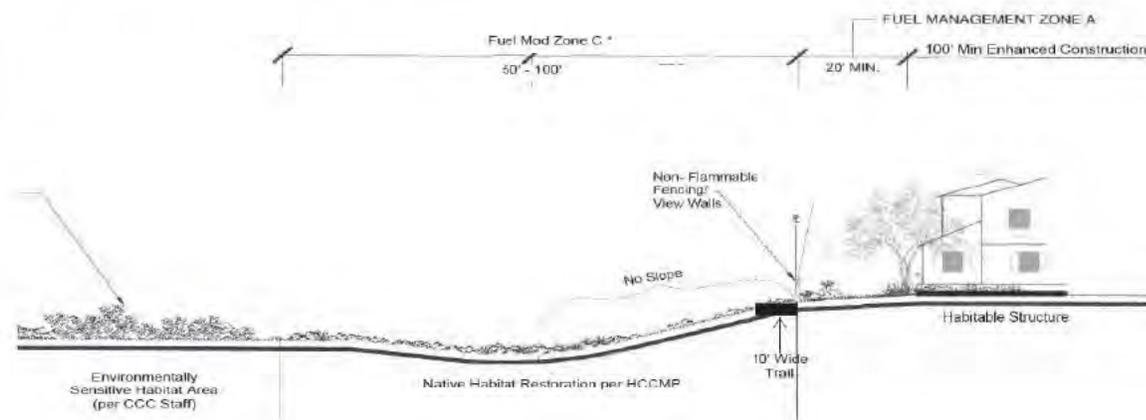
To California Coastal Commission (CCC) staff:

Re: Letter from City of Newport Beach Fire Chief Poster, dated 6-21-16

Approximately 40 acres of Banning Ranch is located within the City of Newport Beach and under the jurisdiction of the Newport Beach Fire Department. In his 6-21-16 letter to the Deputy Director Sherilyn Sarb, City of Newport Beach Fire Chief Steve Poster implies that fuel modification Zone “C” should overlap with ESHA buffer. On page 2, Chief Poster states:

I understand that the NBR plan identifies a 10’ wide non-combustible trail between the ESHA buffer and the development envelopes and an additional 20’ of Zone A defensible space within the development envelopes adjacent to the trail noted above and the first habitable structure.

This statement would imply that fuel modification Zone C (a 50’ – 100’ wide fuel modification zone which consists of a mosaic pattern of fire resistive plants, and which is located outside of Zone A) is, in fact, the ESHA buffer. Chief Poster reinforces this concept of fuel modification Zone C acting as ESHA buffer with the diagram in Exhibit Z of his letter, where fuel modification Zone C is located directly between the above-mentioned 10’ non-combustible trail and ESHA.



* Planted with grasslands, open rock areas & succulents as identified in the city approved NBR Fire + Life Safety program. (Fuel Management Zone C, Plant Palette).

TYPICAL

Exhibit Z

Officers:

Terry Welsh, M.D.
President

Suzanne Forster
Vice-President

Deborah Koken
Secretary

Jennifer Frutig, Ph.D.
Treasurer

Steve Ray
Executive Director

Board Members:

Diane Silvers, Ed.D.

Mark Tabbert

Jan Vandersloot, M.D.
In Memoriam

Mailing Address:

P.O. Box 15333
Newport Beach, CA
92659-5333

Phone:

(714) 719-2148

E-Mail Address:

info@banningranchconservancy.org

Fuel modification zones can't be allowed to overlap with ESHA buffers. Rather, all fuel modification zones must be contained within the development footprint.

The CCC has long made it well-known to the City of Newport Beach and the applicant that all fuel modification zones must not overlap with ESHA or ESHA buffers. In a 4-16-09 letter in response to the City's Notice of Preparation (NOP) for the planned EIR, the CCC staff addressed this issue clearly and directly.

Fuel modification requirements to address fire hazard should be set back (outside of buffers) so that the buffer areas serve their intended function of protecting ESHA from the disruption of habitat values. Again pursuant to Section 30240 of the Coastal Act development adjacent to ESHA must be compatible with the continuance of the ESHA. Fuel modification has generally not been considered to be compatible with protection of ESHA. In addition, this appears to be inconsistent with CLUP policies to provide a minimum 50-foot buffer area to ensure the biological integrity and preservation of the habitat they are designed to protect. Coastal LUP policy calls for buffer areas to be maintained with exclusively native vegetation to serve as transitional habitat, not as a fuel modification zone.

In the 3-16-16 CCC staff report 5-15-2097, CCC staff again made it clear that any fuel modification zones must be contained within the development footprint. Special Condition 1.C.1 states:

A revised final site plan shall be provided that limits the residential, commercial and active park development footprint, including all supporting infrastructure such as roads, utilities, drainage facilities and fuel modification zones to the "potential development areas" as identified in Exhibit 25

In their 4-29-16 biology memo contained within the CCC staff report 5-15-2097, Drs. Engel and Dixon state, no less than four times:

No fuel modification activities for fire safety should take place within the ESHA or ESHA buffer

Drs. Engel and Dixon address the potential need for a fuel modification Zone C by stating:

If fuel modification zones are required by the local fire authority, additional setbacks or other protective measures may be required to prevent intrusion into ESHA and ESHA buffers.

Fuel modification zones can't be allowed to overlap with ESHA buffers. Rather, all fuel modification zones must be contained within the development footprint.

It is strongly recommended that Chief Poster, and the applicant, be notified as soon as possible and instructed on the need for all fuel modification zones to be located within the “potential development areas” and not within ESHA or ESHA buffers.

Thank you,

A handwritten signature in cursive script, appearing to read "Terry".

Terry Welsh

President, Banning Ranch Conservancy

RECEIVED
South Coast Region

JUL 05 2016

**CALIFORNIA
COASTAL COMMISSION**



PROPOSED CULTURAL RESOURCE TREATMENT PLAN

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval of the Executive Director a Cultural Resources Treatment and Monitoring Plan prepared by a qualified professional, in consultation with the Tongva/Gabrielino, Kizh, and Acjachemen/Juaneno Tribal Nations, the Native Nations Traditionally Culturally Affiliated with the Project Site

The Cultural Resource Treatment and Monitoring Plan ensures that any Tribal Cultural Resources, historical, archaeological, and paleontological resources, that may be inadvertently discovered and/or adversely impacted by the approved development will be treated in accordance with State law and the cultural and spiritual beliefs of the Tongva/Gabrielino, Kizh and Acjachemen/Juaneno Tribes. The Cultural Resource Treatment and Monitoring Plan shall require the following:

- CUL-1: Tongva, Kizh and Acjachemen Native American monitors (“NA Monitors”) and an archaeological monitor shall be present during all ground disturbing activities.
- CUL-2 Any and all uncovered Tribal Cultural Resources of Tongva, Kizh or Acjachemen Native American cultural importance should be returned to the tribes, and/or the Most Likely Descendant, if applicable, and not be curated.
- CUL-3 NA Monitors and archaeological monitors shall have joint authority to temporarily divert and/or halt construction activities. If Tribal Cultural Resources are discovered during construction, all ground disturbing activity within and around the immediate discovery area must be diverted until the NA Monitor and the archaeologist can assess the nature and significance of the find.
- CUL-4 The NA Monitor and archaeological monitor shall be present at the project’s preconstruction meeting to consult with grading and excavation contractors concerning excavation schedules and safety issues.
- CUL-5 If a significant Tribal Cultural Resource and/or unique archaeological resource is inadvertently discovered during ground disturbing activities for this project, the Native Nations shall be notified and consulted regarding the respectful and dignified treatment of those resources. Pursuant to California Public Resources Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological, historical, paleontological and Tribal Cultural Resources. If however, the Applicant is able to demonstrate to the California Coastal Commission that avoidance of a significant and/or unique cultural resources is infeasible and a data recovery plan is authorized by the California Coastal Commission as the permitting agency, Native Nations shall be consulted regarding the drafting and finalization of any such recovery plan.



- CUL-6 When Tribal Cultural Resources are discovered during the project, if the archaeologist collects such resources, an NA Monitor must be present during any testing or cataloging of those resources. If the archaeologist does not collect the cultural resources that are unearthed during the ground disturbing activities, the NA Monitor, may in their discretion, collect said resources and provide them to the tribe for respectful and dignified treatment in accordance with the Native Nations' cultural and spiritual traditions.
- CUL-7 If suspected human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Orange County Coroner has made the necessary findings as to origin. Suspected Native American remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made pursuant to California Public Resources Code Section 5097.98(b). Suspected Native American remains shall be examined in the field and shall remain in place or kept in a secure location at the site. A Native Monitor shall be present during the examination of the remains. If the Orange County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. The NAHC must then immediately notify the Most Likely Descendant of receiving notification of the discovery.
- CUL-8 Under no circumstances shall the discovered Native American remains be subjected to any testing, invasive or non-invasive in nature, without the express written consent of the Most Likely Descendant, in accordance with California Public Resources Code Section 5097.98.
- CUL-9. In the event that fill is imported into the project area, the fill shall be clean of Tribal Cultural Resources and documented as such. If fill material is to be utilized and/or exported from areas within the project site, then that fill shall be analyzed and confirmed by an archeologist and NA Monitor that such fill material does not contain Tribal Cultural Resources.

To this end, the cultural resources monitoring plan shall require that archaeological and Native American monitors be present during all grading operations. There shall be at least one pre-grading conference with the monitors and the project manager and grading contractor at the project site in order to discuss the potential for the discovery of archaeological resources. Because archaeological resources are known to exist in the project vicinity, the applicant may choose to prepare a subsurface cultural resources testing plan, subject to the review and written approval of the Executive Director, prior to proceeding with the approved development. If the subsurface cultural resources testing plan results in the discovery of cultural resources, the applicant shall prepare a mitigation plan, which shall be peer reviewed and reviewed by designated representatives of the appropriate Native American tribe, and shall apply for an amendment to this permit in order to carry out the mitigation plan.



RECOMMENDATIONS

1. Permit review for proposed Banning Ranch Project be scheduled as an agenda item for a South Coast Coastal Commission Hearing during the 2017 calendar year rather than in September 2016 in order to:
 - a. Provide sufficient time for cultural experts from impacted Native Nations to thoroughly review the documents received in June, 2016, in light of request to extend development footprint submitted by landowner to Coastal Commission staff in June 2016;
 - b. Provide sufficient time for Tongva/Gabrielino, Kizh Nation, and Acjachemen/Juaneno Nations to develop proposal for open space co-management or other land management arrangement in collaboration with the landowner, Native American Land Conservancy and other parties to be identified;
 - c. Provide sufficient time to conduct ethnographic interviews and conduct literature reviews to establish the areas identified as Traditional Cultural Landscapes by Tongva, Kizh and Acjachemen Nations and determine any adverse impacts to these areas;
 - d. Allow for additional testing within the expanded proposed development footprint in order to more accurately establish the location of cultural and archaeological resources within the project area;
2. All or some portion of the property interests in the protected lands, trails and recreation areas offered by landowner for their protection should be dedicated to the Native American Land Conservancy to hold on behalf of Tongva Acjachemen Land Conservancy to be established within two years of land dedication;
3. Any entity in receipt of dedicated property interest in designated open space areas should be required to include at least one representative from each Native Nation with ancestral ties in the project area on the organization board, advisory board, and should make firm commitments to diverse representation among staff; and
4. Landowner should provide guaranteed income stream from Project for perpetual natural open space maintenance and management by a Native American [Tongva/Gabrielino, Kizh, and Acjachemen/Juaneno] Land Trust.

9

From: [Ryan Long](#)
To: [BanningRanchComments@Coastal](#); [Teufel, Cassidy@Coastal](#)
Subject: Permits: 5-15-2097 & 9-15-1649
Date: Saturday, July 30, 2016 1:19:41 PM
Attachments: [California Coastal Commission - Newport Shores CA.docx](#)

Good Day,

Attached are comments regarding Permit Numbers; 5-15-2097 & 9-15-1649 from the community of Newport Shores, Newport Beach California.

Thank you for your time,

Ryan Long
949-413-6691

July 30, 2017

Dear California Coastal Commission,

In regards to Coastal Development Permits Number: 5-15-2097 and Permit Number: 9-15-1649, the Newport Shores Community Outreach Committee would like to comment on the two (2) following permits submitted.

Permit Number: 5-15-2097

The Newport Shores Community Outreach Committee supports the Coastal Commissions Staff Report of May 2016. The staff gave a clear indication of what the maximum development allowed under the Coastal Act can be.

We would like to comment the following:

- No Bluff Road connecting 17th, 16th and 15th streets to PCH. Not only does this preserve valuable habitat, but it is the best traffic solution to have four separate developments each with one access point. This will minimize the impact on Coast Hwy, which already exceeds acceptable traffic loads.
- The preservation of Wetlands CC and C on the staff map. Not only does this preserve valuable habitat, it helps create a green buffer between the new development and Newport Shores
- Minimum setbacks from the bluff increased to 200 feet.
- Preservation of the currently paved truck road between the current North Oil Field triangle and 17 Street

Permit Number: 9-15-1649

The Newport Shores Community Outreach Committee does not support the current proposal that has been submitted by The West Newport Oil Company. This current plan will affect the residents and community of Newport Shores in a negative way.

We would like the following permit to be rejected due to the following concerns.

- Excessive amount of new wells to be drilled. The requested amount is designed to deprive our community of future input. The proposed drilling should be no more than the wells that will be capped and replaced in a two-year period and each two years new CCC permits requests, so our community has an ongoing voice on the quality of life for our neighborhood.
- Using the canal road way to PCH to transport oil, the existing road (mentioned above that connects to 17th Street should continue to be the main oil road as it is being used today to transport) should be continued as the route.
- Twenty four (24) hour drilling is not practical for a densely populated area. The City Charter for Newport Beach does not allow any oil operations. It was amended in 2010 to accommodate this project. However, all construction in Newport Beach is from 7:00AM to 6:30PM Monday thru Friday and 8:00Am thru 6:00PM on Saturday with no work allowed on Sunday or Holidays. We should expect the same restrictions for this CDP.

Thank you for listening to our concerns.

The Newport Shores Community Outreach Committee

511 Canal St, Newport Beach, CA 92663

Newportsca.com

Ryan Long

HOA Director – Newport Shores Community Association

Chairman – Newport Shores Community Outreach Committee

949-413-6691

ryanaloislong@gmail.com

From: [Terry Welsh](#)
To: [Dixon, John@Coastal](#); [Engel, Jonna@Coastal](#); [Sarab, Sherilyn@Coastal](#); [Willis, Andrew@Coastal](#); [Schwing, Karl@Coastal](#); [Dobson, Amber@Coastal](#); [BanningRanchComments@Coastal](#); [Ainsworth, John@Coastal](#); [Henry, Teresa@Coastal](#)
Cc: [Steve Ray](#)
Subject: Banning Ranch letter
Date: Friday, July 29, 2016 6:49:01 AM
Attachments: [Letter to staff on vernal pools.pdf](#)

To the CCC staff:

Attached is a letter on Banning Ranch vernal pools.

Please call if you have any questions. 714-719-2148

As always, thank you for the very large amount of time and work you have spent on Banning Ranch.

Terry Welsh



Officers:

Terry Welsh, M.D.
President
Suzanne Forster
Vice-President
Deborah Koken
Secretary
Jennifer Frutig, Ph.D.
Treasurer

Steve Ray
Executive Director

Board Members:

Mark Tabbert
Diane Silvers Ed. D

Jan Vandersloot, M.D.
In Memoriam

7-29-16

Application No. 5-15-2097 (Newport Banning Ranch, LLC, Newport Beach) – OPPOSITION

To the California Coastal Commission (CCC) and staff:

Thank you for the time and consideration you have given to the issue of the proposed Banning Ranch development project .

On behalf of the Banning Ranch Conservancy, I would like to again address the issue of vernal pools. This letter is meant to compliment the more detailed vernal pool report prepared by Dale Ritenour of ICF International. This letter is also meant to compliment the more comprehensive review of the overall biological resources of Banning Ranch prepared by Robert Hamilton. This letter will not address the issue of criteria for determination of wetlands under the Coastal Act (which will be addressed separately).

Introduction: The vernal pool complex at Banning Ranch predates the oil field. Any Coastal Development Permit (CDP) issued by the CCC should be conditioned such that complete and satisfactory protocol surveys for vernal pool indicator branchiopods and vernal pool vegetation, as well as delineation of all vernal pool watersheds, be required for a full mapping of the Banning Ranch vernal pool complex. Similarly, any CDP should also be conditioned such that any proposed development be sited at an adequate distance from the vernal pool complex watersheds and the PEMA wetland near Carden Hall School.

- 1. The applicant's claim that the vernal pool complex at Banning Ranch is an artefactual man-made creation is not true.**

Although impacted and modified to varying degrees by the oil operation during the last 70 years, there can be no doubt that the vernal pool complex at Banning Ranch predates the oil operation. This is supported by the presence of mima mounds in historical pre-oilfield aerial photos (some of the larger vernal pools are also visible in these same photos), the topography and clay soil serving as an aquatard, and the presence of a nearby vernal pool complex with similar characteristics (Fairview Park). The vernal pool complex at Banning Ranch is the only one in Orange County containing USFWS -declared critical habitat for the endangered San Diego Fairy Shrimp (*Branchinecta sandiegonensis*). This vernal pool complex is also one of only a few remaining along the entire Southern California coast and one of only two remaining on the Orange County coast.

P. O. Box 15333
Newport Beach,
CA 92659-5333

(310) 961-7610

As the US Fish and Wildlife Service (USFWS), in discussing the Banning Ranch vernal pool complex in their 2007 ruling, states:

“This vernal pool complex and the vernal pool complex at Fairview Park (subunit 1B) represent the only remaining examples of coastal vernal pools in Orange County.”

Being a historical vernal pool complex (rather than a man-made artefactual creation), determination and delineation of individual vernal pools should incorporate data on fauna that are commonly seen in vernal pools (though may also be seen elsewhere), such as non-listed fairy shrimp, ostracods, and cladocera.

1. Surveys are not complete.

It must be recognized that vernal pool branchiopod surveys necessary to rule out the presence of USFWS-listed vernal pool indicator species have not been conducted completely or satisfactorily according to USFWS protocols. Vernal pool vegetation surveys have also not been conducted satisfactorily. Five consecutive years of drought provide only a partial explanation for this, as the applicant had ample opportunity during the above-average rainfall years of 2009/2010 and 2010/2011 to complete these surveys but chose only to survey a subset of the pools during these years (only four pools in 2009/2010). The lack of protocol USFWS surveys was addressed on page 24 of Dr. Dixon’s and Dr. Engel’s 4/29/16 memo:

“Therefore, while eight ponds have been determined to support San Diego fairy shrimp, the presence or absence of San Diego fairy shrimp in the other ponds remains inconclusive and an additional wet season vernal pool protocol level survey may be required by the Service.”

To be considered adequate, vernal pool vegetation studies must be completed during the spring flowering period for annual plants. Several visits should be made during the blooming period, between March and April, during years with at least normal rainfall, when the vernal pool indicator plants are most visible and recognizable. The vernal pool vegetation surveys conducted by the applicant’s biologists were limited to a single day in in June 2012. Such an approach is completely inappropriate. As one clear example, Dudek reported that vernal pool K supported no woolly marbles (*Psilocarphus brevissimus*), a vernal pool indicator plant. Vernal pool K straddles the property line between the NBR property and the adjacent Newport Mesa Unified School District (NMUSD) property, and was therefore surveyed during spring 2014 by botanist David Bramlet in conjunction with an unpermitted fence installed by NMUSD. Writing about vernal pool K, Mr. Bramlet reported:

“...woolly marbles are found scattered throughout this depression.”

This lack of adequate branchiopod and vegetation surveys was emphasized by the Regional Water Quality Control Board (RWQCB) when, on 4/15/16, the RWQCB conditioned (see conditions 4 and 5 below) its Section 401 Water Quality Certification for the proposed Banning Ranch development project by requiring vernal pool branchiopod and vernal pool vegetation surveys to be completed during the upcoming 2016/2017 wet season, the results of which will be utilized to identify vernal pools to be avoided prior to any construction:

4) The Applicant shall complete wet season branchiopod and vernal pool vegetation surveys in areas of ponding identified in the May 2013 Dudek report entitled

Jurisdictional Determination of Seasonal Features for the Newport Banning Ranch. These surveys shall be conducted during the 2016-17 wet season prior to commencing on-site construction activities. Annual wet season surveys shall continue in areas identified as vernal pools in the 2016-17 survey and where construction activities are ongoing and/or expected to commence. This information shall be reported to <http://www.californiawetlands.net/tracker/>.

5) Prior to any Project-related grading, functional assessments shall be conducted on the areas listed as 'Seasonal Features' in Table 8 of the Dudek May 2013 report (see Condition 4²) and that are identified to be impacted by project construction. The assessments shall utilize indicator vegetation and animal species surveys specific to vernal pool identification, and all identified 'Seasonal Features' shall be avoided.

Any Coastal Development Permit (CDP) should similarly be conditioned such that the final determination and delineation of vernal pools (and ultimate siting of any potential development) is based upon a complete set of vernal pool branchiopod surveys and vernal pool vegetation surveys.

2. Watersheds should be delineated for all vernal pools in the complex

CCC staff's "Banning Ranch ESHA and Wetlands with 100 Foot Buffers" map (Figure 51 from Dr. Engel's 9/25/15 memo, page 87/87) is deficient in that it doesn't include all vernal pool watersheds for the vernal pool complex on the Banning Ranch mesa. Prior to filing the application, Coastal Commission staff clearly asked the applicant for watershed delineations to be performed on all pools. Rather, the applicant, as attachment 19 in material submitted on 5/17/13, delineated watersheds on only a small number of vernal pools in eastern part of the central mesa (VP1, VP2, E, I and J, but also encompassing VP3, H, and G)

In addition to the water that falls directly on them, vernal pools can be filled with water which drains into them from surrounding watersheds. Without enough water, vernal pools may not function properly. Therefore, watersheds are very important in allowing some vernal pools to function properly during the rainy season.

As Dr. Engel explained in her 9/25/15 memo:

"A buffer that includes the watershed is necessary to account for natural changes in the basin dimensions over time in response to varying hydrological conditions and to prevent alterations to the watershed that could impact the duration and extent of ponding."

As explained in Dr. Dixon's and Dr. Engel's 4/29/16 memo:

"We recommend that development be set back a minimum of 100 feet from the edge of wetlands or 10 feet from the edge of vernal pool watersheds, whichever is greater."

Any Coastal Development Permit (CDP) should be conditioned such that the final determination and delineation of all vernal pool watersheds will be performed, and any potential development sited at an appropriate distance from the watersheds.

3. PEMA wetland near Carden Hall School

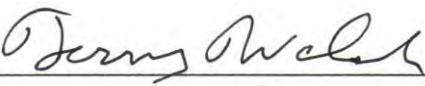
Along the eastern boundary of Banning Ranch, between Carden Hall School and the Coastline Community College campus is a Palustrine Emergent (PEMA) wetland (see Figure 1), mapped on the USFWS National Wetland Inventory as well as mapped on the California EcoAtlas Wetland Map referred to above by the RWQCB

<http://www.californiawetlands.net/tracker/>. This PEMA wetland is located in the current “development footprint” suggested by CCC staff (see Figure 2).

The PEMA wetland near Carden Hall School should be preserved with a 100’ buffer.

Conclusion: The vernal pool complex at Banning Ranch predates the oil field. Any Coastal Development Permit (CDP) issued by the CCC should be conditioned such that complete and satisfactory protocol surveys for vernal pool indicator branchiopods and vernal pool vegetation, as well as delineation of all vernal pool watersheds, be required for a full mapping of the Banning Ranch vernal pool complex. Similarly, any CDP should also be conditioned such that any proposed development be sited at an adequate distance from the vernal pool complex watersheds and the PEMA wetland near Carden Hall School.

Thank you for your consideration,



Terry Welsh

President, Banning Ranch Conservancy

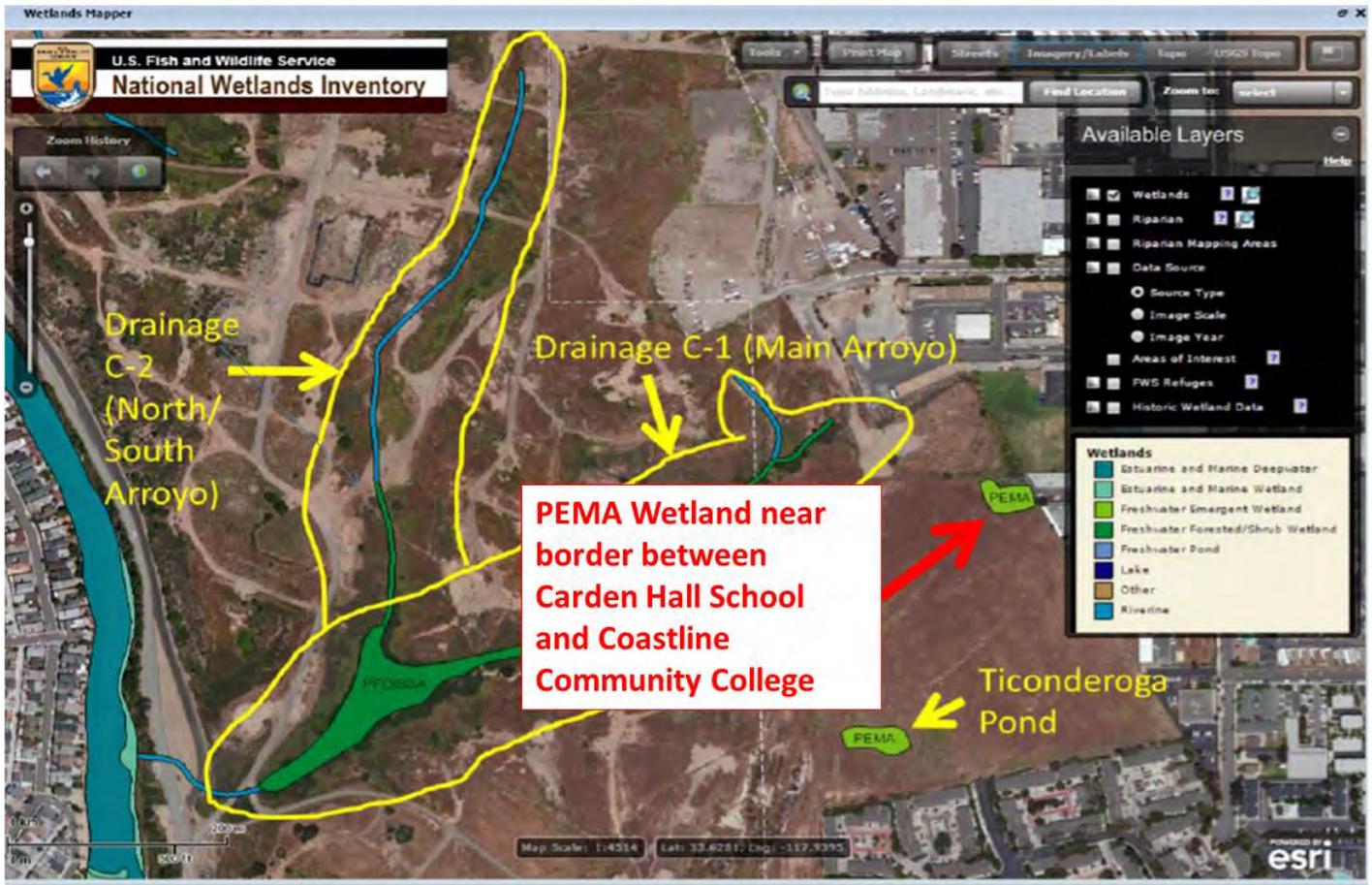


Figure 1: Location of PEMA wetland on eastern border of Banning Ranch between Carden Hall School and new Coastline Community College campus

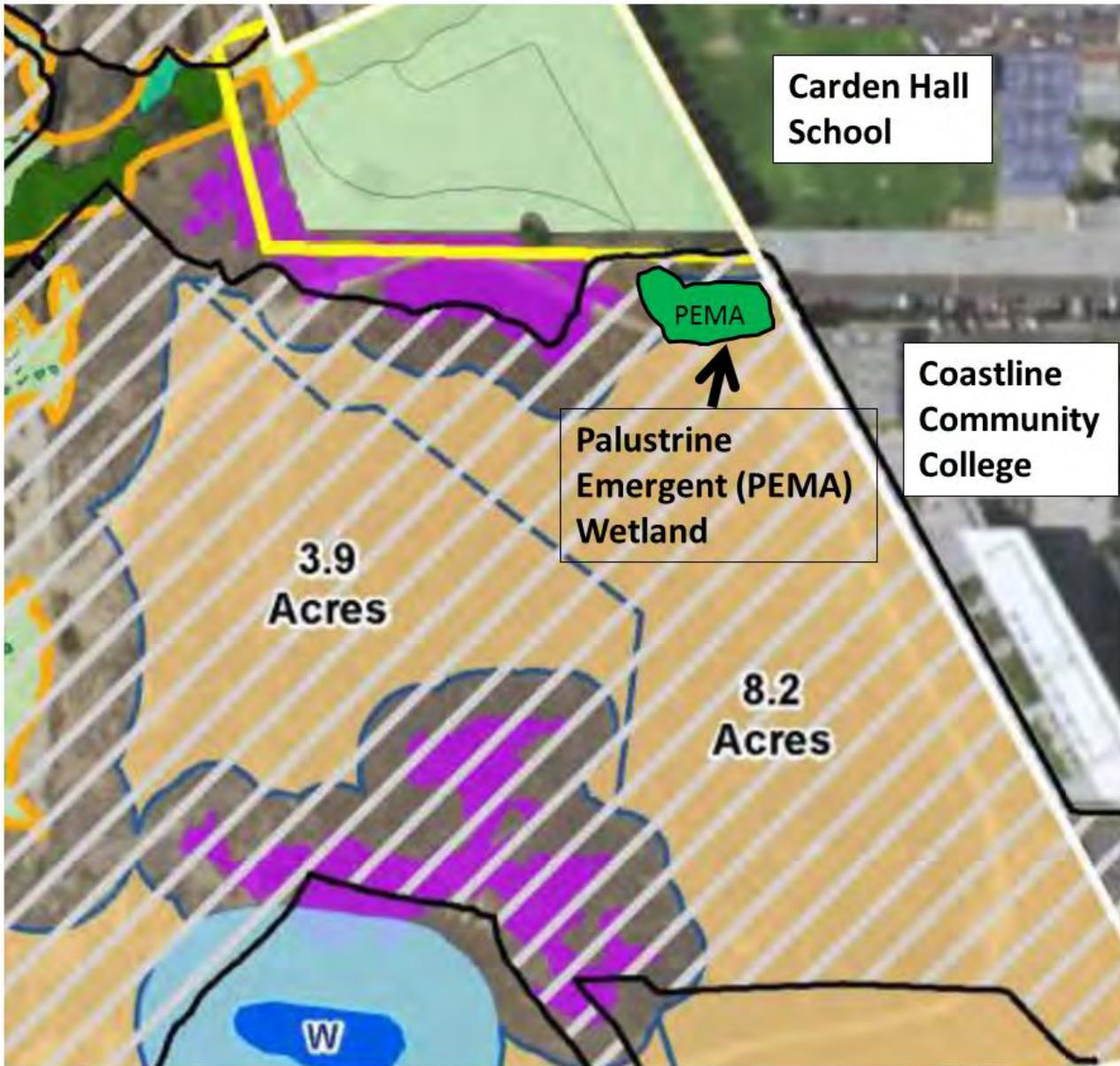


Figure 2: PEMA wetland located within "development footprint" suggested by CCC staff.

From: [Sandra Petty-Weeks](mailto:Sandra.Petty-Weeks@coastal.ca.gov)
To: [BanningRanchComments@Coastal](mailto:BanningRanchComments@Coastal.ca.gov)
Cc: dkiff@newportbeachca.gov
Subject: Banning Ranch Comments - Recommend DENIAL of Coastal Development of Permit No. 5-15-2097
Date: Friday, July 29, 2016 4:39:02 PM

Dear Coastal Commission,

I support the Coastal Commission staff report of **October 2015**. It is your duty to uphold the Coastal Act and protect ESHA. Once this property is developed, it cannot be recovered.

As a Newport Beach resident living very close to the proposed development area, this affects me directly on many levels. I strongly believe that preservation of the remaining California coastline and ESHA is critical and provides economic as well as environmental benefit.

Sincerely,

Sandra Petty-Weeks
262 Cedar Street
Newport Beach, CA 92663

The Costa Mesa Westside Coalition

929 Newhall Street

Costa Mesa CA 92627

cmwestside@gmail.com

July 26, 2016

Ms. Amber Dobson
California Coastal Commission
200 OceanGate, 10th Floor
Long Beach, CA 90802

RECEIVED
CALIFORNIA COASTAL COMMISSION

RECEIVED
South Coast Region

AUG 01 2016

RECEIVED
CALIFORNIA COASTAL COMMISSION

RECEIVED
CALIFORNIA COASTAL COMMISSION

Re: Newport Banning Ranch Coastal Development Permit Application No. 5-15-2097

Dear Ms. Dobson:

Let's be clear.

Mike Mohler's statement in the June 28th Orange County Register and June 29th Los Angeles Times, "We think it's important that the people of Costa Mesa – in particular the community of Westside Costa Mesa – have a road that would allow a direct connection to the coast," is definitely mistaken. The majority of Westside Costa Mesa residents do not want another road that "allows a direct connection to the coast." We have been fighting any such road since 1957!

In fact, opposition to a similar connection brought over 500 strongly opposed residents (that's The Orange County Register's count, not ours!) to a meeting at Eader School on Thursday evening, January 12, 2012. Because of that meeting and subsequent city and neighborhood actions, the Orange County Transportation Authority (OCTA) voted to remove the 19th Street Bridge from the County Master Plan of Arterial Highways on November 5, 2012. While the current NBR plan doesn't include a 19th Street connection, Westside residents are similarly opposed to any road that would connect either 15th, 16th, or 17th streets to Pacific Coast Highway (PCH).

Here are a few of the reasons we oppose any additional road that connects PCH to any street in Westside Costa Mesa or Westside Newport Beach through Banning Ranch:

- We are greatly concerned that such a connecting road would result in the shuttling of daily commuter traffic between PCH and Highway 55. This road, with the commuter traffic and the proposed Banning Ranch project's traffic, will burden existing roads and intersections.
- The residents of the Westside never complain about lack of access to PCH. We have a fine road – Superior Avenue, a wide, multi-lane thoroughfare. We can also access PCH via an easy 5 to 10-minute drive on Hospital Road to Newport Avenue, 17th Street to Dover, or Victoria Street to Brookhurst. Bluff Road would not shorten that time. Clearly, Bluff Road serves the interests of the developers and not the residents of Westside Costa Mesa.
- Bluff Road will radically change the character of our neighborhood from tranquil and comfortable to congested, dangerous and noisy. Westside Costa Mesa and residents already bear more negative aspects from the proposed Banning Ranch development than any other area. The road does not

benefit us; it adds to those negatives. We are not against development but we do not think it should ruin our quality of life.

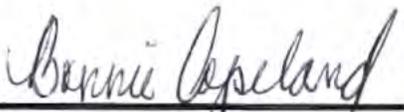
- Constructing Bluff Road will seriously impact listed species (California Gnatcatcher and San Diego Fairy Shrimp) and so will the contaminated dust and dirt it releases into our air. Moreover, the ongoing pollution from the cars using this road will affect our health and these species well into the future.

As then Huntington Beach Mayor and OCTA Planning Board member Don Hansen said just before the OCTA voted to remove the 19th Street Bridge from the County Master Plan, "The definition of insanity is to do the same thing over and over again and get the same result. I just think it's time to call this question once and for all."

We are asking the Coastal Commission to do the same thing. No matter how many times this road is proposed, no matter how many twists and turns and routes it takes, the neighborhoods surrounding it do not want and do not need it.

Please, PLEASE put an end to this insanity right now. STOP Bluff Road!

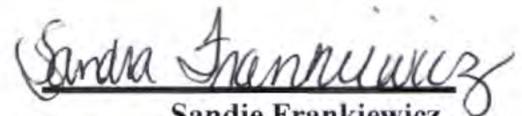
For The Costa Mesa Westside Coalition:



Bonnie Copeland



Michelle Simpson



Sandie Frankiewicz

From: [Molly](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch Permit
Date: Thursday, July 21, 2016 10:54:24 AM

To: Coastal Commission Staff

I am recommending DENIAL of Coastal Development of Banning Ranch Permit No 5-15-2097. I am requesting the Coastal Act be upheld and protect ESHA and neighboring human habitat.

sincerely

Molly Wiehardt

479 62nd street

Newport Beach, Ca., 92663

From: aivan879@gmail.com on behalf of [Aivan N](#)
To: BanningRanchComments@Coastal
Subject: Comment on Permit no 5-15-2097
Date: Sunday, July 17, 2016 10:50:54 AM

Hi I would like to recommend denial of coastal development of Banning Ranch (Permit No 5-15-2097) and denial of CDP no 9-15-1649.

Please uphold the Coastal Act and protect ESHA.

Thank you for your time and consideration.

LARRY BLUGRIND
4479 ST. ANDREWS DR.
CHINO HILLS, CA 91709

Dear Coastal Commission,

I want you to OPPOSE the proposed project, the Newport Banning Ranch near Costa Mesa, Huntington Beach, and Newport beach as it would COMPLETELY RUIN the precious open spaces that our beaches need to preserve their present beauty as well as the environmentally sensitive habitat area there. Your job is to preserve open spaces on our coastline rather than capitulate to selfish developers who, for money, would RUIN the appearance of our coastline and make it look like another Collins Avenue in Miami beach or Kalakaua Avenue in Honolulu. We are at the 40th anniversary of the California Coastal Act that was meant to PROTECT THIS PRECIOUS RESOURCE, NOT DESTROY IT LIKE YOU SEEM TO WANT TO. In 1972, voters approved Prop. 20 that created YOUR commission to lay down the law on coastal development and favor preservation, something YOU HAVE STOPPED DOING! We have long stretches where a coastal drive gives you a view of NOTHING BUT THE BACKS OF HOUSES OR HOTELS THAT SHOULD NEVER HAVE BEEN ALLOWED TO BE BUILT IN THE FIRST PLACE! Among your commission, there are members AT ODDS WITH EACH OTHER when some of your staff raise CONCERNS about the NEGATIVE EFFECTS of proposed developments. As I see it, your member, Wendy Mitchell and some other members in cahoots with developers helped fire Charles Lester - a TRUE PROTECTOR of our coastline for stating that he believes that PRIVATE CONVERSATIONS between commissioners and permit applications (from developers) have NO PLACE in a quasi-judicial process. For being a TRUE PROTECTOR of our coastline and a job performance ADMIRER by just about everybody EXCEPT YOUR COMMISSION, he was FIRED for doing his job - STOPPING OVERDEVELOPMENT of our coastline. For you to say he was not doing his job IS A BIG FAT LIE because he went against the excessive development of our coastline!!!

As a taxpayer, I urge you to start DOING THE JOB THAT PUT YOU IN PLACE TO DO - STOP OVERDEVELOPMENT OF OUR COASTLINE BY SEVERELY LIMITING ANY FUTURE DEVELOPMENT OF OUR COASTLINE and tell these GREEDY DEVELOPERS a word you are not used to telling them, "NO!".

Extremely disappointed in your performance,

Larry Blugrind

RECEIVED
South Coast Region

JUL 15 2016

CALIFORNIA
COASTAL COMMISSION

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Tuesday, July 12, 2016 11:20:30 AM

Dear CA Coastal Commission,

Dear Commissioners:

I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

That land currently provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA).

The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch.

The importance of open environment areas for the mental health and well being of the population can not be over estimated. In the current stressful environment of our society an open area of lush green is soothing to the soul and elicits calm. A park with wildlife habitat amidst an otherwise hectic city life is a breath of fresh air that calms and restores tranquility to people. Banning Ranch must be left undeveloped for the good of the California Coast.

Sincerely,

Patricia Rudner
5080 Laurel Ave.
Cypress, CA 90630-
prudner@yahoo.com
(714) 995-5555

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Tuesday, July 12, 2016 11:20:23 AM

Dear CA Coastal Commission,

Dear Commissioners:

I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

That land currently provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA).

The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch.

The importance of open environment areas for the mental health and well being of the population can not be over estimated. In the current stressful environment of our society an open area of lush green is soothing to the soul and elicits calm. A park with wildlife habitat amidst an otherwise hectic city life is a breath of fresh air that calms and restores tranquility to people. Banning Ranch must be left undeveloped for the good of the California Coast.

Sincerely,

Patricia Rudner
5080 Laurel Ave.
Cypress, CA 90630-
prudner@yahoo.com
(714) 995-5555

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Monday, July 11, 2016 3:40:08 PM

Dear CA Coastal Commission,

Dear Commissioners:

I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

That land currently provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA). The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch.

Additionally, this project should be denied because the traffic and run-off will add to air and ocean pollution.

Robert Somers

Sincerely,

Robert Somers
9351 Hudson Drive
Huntington Beach, CA 92646-
rfsomers@hotmail.com
(714) 955-7524

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Monday, July 11, 2016 5:04:49 PM

Dear CA Coastal Commission,

Dear Commissioners:

I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

That land currently provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA).

The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch.

There are many more reasons to reject this flawed plan as well.

Sincerely,

Ed Van den Bossche
121 40th St
Newport Beach, CA 92663-
edvanforte@roadrunner.com
(949) 650-0943

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Monday, July 11, 2016 3:40:08 PM

Dear CA Coastal Commission,

Dear Commissioners:

I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

That land currently provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA). The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch.

Additionally, this project should be denied because the traffic and run-off will add to air and ocean pollution.

Robert Somers

Sincerely,

Robert Somers
9351 Hudson Drive
Huntington Beach, CA 92646-
rfsomers@hotmail.com
(714) 955-7524

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Thursday, June 30, 2016 12:44:10 PM

Dear CA Coastal Commission,

Dear Commissioners:

I am a 49-year resident of Costa Mesa, CA, a city that will be very negatively affected by any development at Banning Ranch. I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

That land currently provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA). The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch.

Sincerely,

FLO MARTIN
2442 Andover Place
Costa Mesa, CA 92626-
flomama@aol.com
9499333699

From: [Lea](#)
To: BanningRanchComments@Coastal
Subject: AGAINST Proposed development of Banning Ranch
Date: Wednesday, June 29, 2016 5:38:48 PM

Dear Coastal Commission:

I hope you deliberate long and hard about the proposed development of Banning Ranch. I live near the area and enjoy looking over undeveloped landscape without more houses, hotel and retail. We enjoy one of the last open spaces within view of the Pacific Ocean - let's keep it that way.

The developer claims the only way the old, abandoned oil fields will be decontaminated is by allowing them to build on the property. Why isn't the owner of the old wells required to clean up the soil? We recently had to limit our water usage due to the drought, which has not ended. We don't need more people flushing toilets, running dishwashers and washing machines to deplete our water supply. We don't need more dust in the air (contaminated once the developer starts grading for buildings) nor more traffic on our roads.

Please do NOT allow development of Banning Ranch. Listen to the community, not the developer.

-- Lea Lowe lealowe@onebox.com - email

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Tuesday, June 14, 2016 11:33:14 PM

Dear CA Coastal Commission,

Dear Commissioners:

I was there when the developers first presented their report to you. Their lack of a thorough and thoughtful plan reeked of disrespect to your commission. Their development was twice the size on less than half the space of the Bolsa Chica development. I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

That land currently provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA). The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch. I want my son to be able to enjoy California's true gift to its citizens. Protected areas full of beautiful nature.

Sincerely,

David Theriault
929 Arbor St.
Costa Mesa, CA 92627-
dtheriault@hbuhd.edu
(949) 548-8261

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Thursday, June 16, 2016 1:41:17 PM

Dear CA Coastal Commission,

Dear Commissioners:

Please reject Application 5-15-2097.

Banning Ranch provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA). The California Coastal Act, which is the Constitution of the California Coastal Commission, requires that ESHAs be protected.

I urge you to uphold the California Coastal Act and reject the proposal to develop Banning Ranch.

Sincerely,

Deborah Koken
1778 Kenwood Place
Costa Mesa, CA 92627-
dkoken@hmausa.com
(949) 574-0333

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Wednesday, June 15, 2016 9:27:11 PM

Dear CA Coastal Commission,

Dear Commissioners:

I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

Developing this land
will bring
so much traffic, noise and pollution to the west side of Costa Mesa that it will be detrimental to its
citizens!

That land currently provides habitat to endangered and threatened animals and plant species, and
contains many environmentally sensitive habitat areas (ESHA).
The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop
Banning Ranch.

Terry Powell

Sincerely,

Terry Powell
1929 Whittier Ave
Costa Mesa, CA 92627-
terrydavitt@gmail.com
(949) 270-6700

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Wednesday, June 15, 2016 7:57:54 PM

Dear CA Coastal Commission,

Dear Commissioners:

I write to urge you to reject Application 5-15-2097 to develop Banning Ranch.

That land currently provides habitat to endangered and threatened animals and plant species, and contains many environmentally sensitive habitat areas (ESHA).

The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch.

The full credibility of the Commission is at stake on this vote. In a time of severe drought, heavy traffic patterns, and diminishing wildlife habitat, how could there even be a question as to how to steward this last large parcel of open land.

How many more houses do we need, how many more acres covered with asphalt, how much more water stolen from our aquifers?

The Coastal Commission needs to approve a plan that assigns a true value to habitat preservation, versus supporting a short-term building boom that will help destroy the desirable qualities for which we pay property taxes.

I am dismayed that we could lose this important land to development, rather than entrusting it to invaluable parkland and habitat. People need open space, and wildlife need sanctuaries.

The ESHA protections need to be observed and upheld by the Commission.

Sincerely,

Barbara McElheny
405 N. Bayfront
Newport Beach, CA 92662-
lee.mcelheny@wfp.com
(202) 253-2817

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Wednesday, June 15, 2016 12:47:36 PM

Dear CA Coastal Commission,

Dear Commissioners:

You must reject the application 5.15.2097 which aims to develop land within Banning Ranch. That land is a critical habitat in Southern California, near the coast and needs to be protected from all development. It is a sensitive habitat, of which few are left undamaged.

The California Coastal Act rightfully requires that ESHAs be protected.

I urge you to reject this application and protect our remaining open habitats of which the Banning Ranch is part.

Sincerely,

Jennifer Cameron
65 63rd Place
Long Beach, CA 90803-
jccameron12@gmail.com
5624398741

From: [Bill](#)
To: palford@newportbeachca.gov; jbiddle@newportbeachca.gov; rgarciamay@newportbeachca.gov; tmackinen@newportbeachca.gov; kkramer@newportbeachca.gov; tbrown@newportbeachca.gov; pkoeetting@newportbeachca.gov; bhillgren@newportbeachca.gov; rlawler@newportbeachca.gov; eweigand@newportbeachca.gov; pzak@newportbeachca.gov; eweigand@newportbeachca.gov; BanningRanchComments@Coastal
Subject: Re: Newport Banning Ranch project
Date: Monday, May 09, 2016 6:46:52 PM

To All

This is a comment on the proposed Newport Banning Ranch project. As a citizen and resident of Costa Mesa as well as Southern California, I STRONGLY oppose the proposed development of this project.

Other than the impact on the natural environment. It doesn't take a genius to understand what the additional development will do the environment as well as the quality of living in and around the City of Costa Mesa/Newport Beach areas. Have you not noticed the vehicle traffic increase within the last couple of years as a result of development of multi-family housing within the City of Costa Mesa alone? Traffic now backs up from Huntington beach to Newport beach, from the I5 to Coast Highway (Coast highway, Adams, Hamilton/Victoria, Harbor Blvd, Irvine Avenue, Newport Blvd, Brookhurst, etc.) it now takes 20-25 mins to go 6 miles to work near the JW airport. All the streets are congested during the commuter hours of 6:30-9:00 am and 5-7 pm as well as the 55 freeway, and by the way with the ongoing development that is in progress in the City of Costa Mesa (Placentia, 17th street; and Victoria street) and the hotels being built along the coast in Huntington Beach, this will get exponentially worse, even without the proposed Newport Banning Ranch project. The infrastructure is not there !!

I can't imagine what will happen to the area should this project go forward. Is it really necessary to make a few bucks and ruin a quality of life already severely impacted by the greed of development? I make a good salary (80K) and in today's market even that has me counting my pennies. I understand development and improving and renewing resources, but as it is, the affluent are getting richer and the middle income/ professional workers are disappearing and fewer and fewer people can afford the use of upper luxury amenities and homes which this project proposes. Build something else !!! We don't need it.

Wouldn't it be nice to be able to take your children or grandchildren to someplace where it is "Just like when you grew up"?

Best Regards

Bill Trigwell
2123 Continental Ave.
Costa Mesa, CA

From: [Lou Anna Denison](#)
To: BanningRanchComments@Coastal
Date: Monday, May 09, 2016 1:24:57 PM

I am very opposed to the change proposed! The marked increase in potential development area is not acceptable and that the CCC staff should stick with their original ESHA delineations.!

Ann Denison

From: [Peggy Otterstrom](#)
To: BanningRanchComments@Coastal
Subject: Coastal CommissionBanning Ranch
Date: Saturday, May 07, 2016 8:53:20 PM

"Stick to the science" and the original Banning Ranch ESHA delineations.

From: [Janet Millian](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Saturday, May 07, 2016 7:40:15 PM

To Whom It May Concern,

The Coastal Commission should deny the Banning Ranch project this time and insist that the project not be approved until it is consistent with the Coastal Act. The marked increase in potential development area is not acceptable and that the CCC staff should stick with their original ESHA delineations. Thank you.

**Sincerely,
Janet Millian**

From: PARS11@aol.com
To: BanningRanchComments@Coastal
Subject: (no subject)
Date: Saturday, May 07, 2016 9:15:42 PM

Commissioners,

Please reconsider the recent decision to allow building on the Banning Ranch property. We are NOT Oklahoma, that is rapidly becoming the California of the midwest due to earthquakes caused from fracking.

What kind of commissioner "forgets" to file ex parte comments and then suddenly remembers when contacted by the L.A. Times? What kind of commission accepts reports from an expert that never walked the property?

The voting majority has lost the confidence of the public and the environmental community in particular. With two huge projects, Banning Ranch and the Poseidon Project in Huntington Beach, now is NOT the time to cave to pressure and money and still tell us you have ethics and follow the Coastal Act. It just doesn't ring true.

Merle Moshiri
Huntington Beach, CA

From: [Bill McCarty](#)
To: BanningRanchComments@Coastal
Subject: The reclassification of ESHA on Banning Ranch is unacceptable
Date: Friday, May 06, 2016 9:29:51 AM

The reclassification of ESHA in the latest CCC Staff report on the Banning Ranch development permit is arbitrary, inconsistent with the California Coastal Act and completely unacceptable. In addition, the sectioning of remaining protected areas by roads and infrastructure will render those areas uninhabitable by endangered species like the Burrowing Owl.

Coastal Commission Staff should stick with their original ESHA delineations called out in report prepared for the October hearing.

Sincerely

Bill McCarty
Costa Mesa, CA

From: [Robert Tighe](#)
To: [BanningRanchComments@Coastal](#)
Subject: stop this now
Date: Friday, May 06, 2016 7:54:25 AM

PLEASE stop,

From: [Tony Guenther](#)
To: BanningRanchComments@Coastal
Subject: Stop the Influence Peddling...
Date: Friday, May 06, 2016 7:27:01 AM

I am a Newport Beach resident for over 25 yrs. , and I oppose the increased development changes to Banning Ranch. I was among the October '15 audience in Long Beach for 8 hrs. as the Lawyers for the developer worked the crowd. With all the construction underway in our environs, as well as the 'water shortage' it is beyond comprehension how the City continues to rubber stamp the development of remaining lands. We're rapidly becoming the New L.A. with traffic & congestion. How much \$\$\$ is enough for the recipients of Soft Money ? Only time will tell. Listen to the People's voices.

Sent from [Mail](#) for Windows 10

From: [Marinka Horack](#)
To: BanningRanchComments@Coastal; [Marinka Horack](#)
Subject: Save Banning Ranch EHSAs-No Room for Any More Traffic
Date: Friday, May 06, 2016 1:34:43 PM

Dear Coastal Commissioners:

Please do not allow anymore destruction of our precious and rare open space in Orange County.

The Banning Ranch is an extraordinary open space at the mouth of the Santa Ana River. Oil companies have been exploiting this land for decades, now they want to exploit it even more by building a high density project on an area that should be protected for future generations.

Haven't they made enough money on oil profits?

Traffic in this area of Newport-Costa Mesa-Huntington Beach is already too heavily impacted during work day

rush hours and summer beach travel. It's bumper-to-bumper for miles along highways and freeways in

the area. The Costa Mesa Freeway (55) becomes a parking lot on many days.

The Banning Ranch project can be voted down alone based on the traffic problems it will generate.

Go ahead: Drive the 55 Freeway at 6:00 PM tonight, then try voting on the Banning Ranch project.

Sincerely,

Marinka Horack

Huntington Beach

From: [Suzy Briggs](#)
To: [BanningRanchComments@Coastal](#)
Subject: Re: development @ Banning Ranch
Date: Friday, May 06, 2016 1:38:42 PM

Please stick with the Coastal Commission original plan of NO DEVELOPMENT @ Banning Ranch!! Just clean it up & leave it be!! Do we have to develop every spot along the coast??? Thank God Joan Irvine gave us Crystal Cove ! Otherwise we would have another resort hotel down there!
Sincerely ,
Suzy Briggs

Sent from my iPad

From: [Marion Coddington](#)
To: [BanningRanchComments@Coastal](#)
Cc: [rvdixons@yahoo.com](#)
Subject: Please save Banning Ranch
Date: Friday, May 06, 2016 12:30:36 PM

Please do not allow any construction on this protected land! We need to save it for our environment!
Sincerely,
Marion Coddington of Newport Beach, CA.
Sent from my iPad

From: [Meridee Thompson](#)
To: BanningRanchComments@Coastal
Subject: Overdevelopment and who does it benefit?
Date: Friday, May 06, 2016 7:59:49 AM

May I comment:

The only thing that makes sense here is to stick with the original ESHA delineation. We do not have to bend to the greed that developers seek to satisfy. The area of coastline here is heavily impacted already by too many people, traffic and commercial outlets.

We would be a much more civilized county if we were in agreement that not every inch of original outdoor space had to be divided up and someone build on it. People do much better as a community if they have, yes those bluffs to drive by, knowing there is some wild out there in the middle of all this commotion we call civilization.

Since Exxon Mobile have already made it clear they will continue to draw oil from the ground in this area there are always the concerns that removing one fluid under the surface of the earth will result in a reaction, like a sinkhole, making unstable ground for any roads, development etc. down the line. We know the oil companies will always keep people's best interests to heart.....not.

Keep Banning Ranch the little bit of mystery on the coast, don't turn it into a mall and parking lot, million dollar homes and more traffic. There are no street improvements planned to allow the thousands of car trips that will be the result of such development. The entire Costa Mesa Newport Beach areas surrounding such a development will suffer with traffic. Not to mention we may be seeing more drought conditions and more homes = more toilets, etc. I am already awfully upset about the lame stack a shacks taking over CM. There too, no additional roadwork to get the new owners to their destinations. 17th and Newport Blvd. is already a dangerous and difficult traffic snarl and this is the closest intersection to the project on 17th. Drive one street over and see how impacted we will be when they continue to enlarge this unpleasant looking high density project. You think we need MORE development? Once this is built over the space is gone forever. No doubt the soil will be cleaned (and airborne) and certified if you can believe the contractor. So much corruption. All it takes is \$\$\$\$\$. I grew up here and have seen what used to be tranquil Newport turn into hyper Newport. No more please!

Thank you for reading my message.
Meridee Thompson

From: [Norm](#)
To: BanningRanchComments@Coastal
Subject: Object to the Costal Commission Staff Report for the May 12, 2016 Banning Ranch Project
Date: Friday, May 06, 2016 12:30:19 PM
Attachments: [Caltrans Letter12-9-090300.pdf](#)

To: California Costal Commission

As a 30 year resident of a Newport Crest townhouse abutting the Banning Ranch, I strongly oppose the Banning Ranch project.

My main issue with this project is the proposed Bluff Rd and PCH intersection which would have to be signalized.

When Caltrans reviewed the Sunset Ridge Park project (adjacent to the Banning Ranch Project) they issued a letter dated December 9, 2009, attached. The Park's proposed access to PCH is the same intersection as the Banning Ranch Bluff Rd. intersection. Caltrans stated that the proposed intersection is not recommended if it shall seriously disrupt traffic flow, which it would.

The Banning Ranch Project EIR stated that without the 19th Street Bridge ((which has been deleted from the Orange County Transportation Authority's (OCTA) Master Plan of Arterial Highways)) that the proposed traffic signal would operate at an LOS "F", which is failing.

The OCTA has recently prepared a study on congestion of PCH from Seal Beach to San Clemente including the area of the proposed traffic signal, which would only make congestion worse.

CCC staff's recommendation of Project approval with conditions would include Caltrans approval of the subject intersection. The last time I talked to Mr. Dave Richardson

At Caltrans, the Banning Ranch project applicant had not applied for an encroachment permit for the proposed intersection.

Sincerely,

Norman J. Suker, P.E., T.E.
14 Odyssey Court
Newport Beach, CA 92663



Virus-free. www.avast.com

ARNOLD SCHWARZENEGGER, Governor

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY

DEPARTMENT OF TRANSPORTATION

District 12
3337 Michelson Drive, Suite 380
Irvine, CA 92612-8394
Tel: (949) 724-2267
Fax: (949) 724-2592



Flex your power!
Be energy efficient!

Post-It* Fax Note	7571	Date	12-10-09	Page	1
To	Janet Brown	From	D. DAVIS		
Co./Dept.	PLANNING	Co.	CALTRANS		
Phone #	(9) 644-3236	Phone #	(9) 440-3487		
Fax #	(9) 644-3229	Fax #	(9) 724-2592		

December 9, 2009

Janet Johnson Brown
City of Newport Beach
3300 Newport Blvd.
Newport Beach, CA 92685-8915

File: IGR/CEQA
SCH#: 2009051036
Log #: 2285A
SR-1

Subject: Sunset Ridge Park

Dear Ms. Brown,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Sunset Ridge Park Project. The project proposes construction of a City park with active and passive recreational uses and an access road to the park through the contiguous private property to the west (Newport Banning Ranch, SCH #2009031061). No nighttime lighting, other than for public safety, is proposed. No nighttime park uses are proposed. The project would include the following uses and facilities: 1 baseball field; 2 soccer fields; playground/picnic area; memorial garden; overlook area with shade structure; pedestrian pathways and bike rack; restroom facilities; up to 119 parking spaces. A signal is proposed on West Coast Highway at the park access road. The City also proposes to widen a portion of the northern side of West Coast Highway from Superior Avenue to a point west of the park access road. The nearest State route to the project site is SR-1.

The California Department of Transportation (Department), District 12 is a responsible agency on this project and has the following comment:

1. Table 1-1, Threshold 4.3-3 in the Level of Significance After Mitigation column should read, "Less than significant impact with mitigation incorporation".
2. The proposed signalized intersection is not recommended based on the MUTCD, chapter 4, which reads, "a traffic control signal should not be installed if it shall seriously disrupt progressive traffic flow".

Please continue to keep us informed of this project and any future developments, which could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Damon Davis at (949) 440-3487.

Sincerely,

Maryam Molavi

Maryam Molavi, Acting Branch Chief
Local Development/Intergovernmental Review

"Caltrans improves mobility across California"

From: [Patricia Rudner](#)
To: BanningRanchComments@Coastal
Subject: ESHA
Date: Friday, May 06, 2016 7:54:25 AM

The changes in the ESHA area are unacceptable and a threat to the environment. This is an important area for wildlife and should not be subjected to development.

Sent from my iPad

From: [Bill McCarty](#)
To: BanningRanchComments@Coastal
Subject: Don't reclassify ESHA on Banning Ranch!
Date: Friday, May 06, 2016 9:34:03 AM

Why has CCC Staff succumbed to political pressure and opened reclassified ESHA on Banning Ranch? This is inconsistent with the California Coastal Act and completely unacceptable. Criss-crossing the remaining ESHA with roads and other development will also make it impossible for endangered species to live there.

Coastal Commission Staff should stick with the ESHA delineations called out in report prepared for the October hearing.

Sincerely

William McCarty

From: callmom@aol.com
To: BanningRanchComments@Coastal
Subject: Does every square inch of Southern California
Date: Friday, May 06, 2016 9:02:20 AM

have to be covered in cement, asphalt and expensive housing?

Enough! Our children and their children need to be able to experience some open, natural land. Once it is paved over, it will never revert.

The quality of our lives is affected by traffic, pollution and crowding.

Let it be!

Thank you,

[Georgia Mahoney](#)

From: [Ted Mumm](#)
To: BanningRanchComments@Coastal
Subject: Development Not Acceptable
Date: Friday, May 06, 2016 10:35:57 AM

Dear Commissioners:

PLEASE DENY DEVELOPMENT OF BANNING RANCH !!!

I simply can't believe that you are actually considering ANY development on Banning Ranch.

It desperately needs to be kept as an intact ecosystem. There is simply nothing like it for many miles to the North and South. Plants, animals, the entire riparian community needs this last bit of intact coastal land.

The area simply doesn't need this development. We don't need to build out every bit of available land, and we have more than enough houses already.

Development is completely against the wishes of the surrounding residents. Newport Beach even spelled it out in our General Plan, which was voted upon and approved overwhelmingly.

The additional car trips will overwhelm PCH.

The construction would cause years of dust and dirt in our air.

The additional residents will put unnecessary strain on resources - police, fire, water, etc.

PLEASE DENY DEVELOPMENT OF BANNING RANCH !!!

Sincerely

Carl W. Mumm
319 Cedar Street
Newport Beach, CA 92663

From: [Lornicada](#)
To: BanningRanchComments@Coastal
Subject: Developing Banning Ranch.
Date: Friday, May 06, 2016 1:54:57 PM

I would like to add my sincere voice of protest to the development of the Banning Ranch area and the change in protected area that your committee has adopted since last Octobers report. I join many others in asking you to stick to your previous ESHA delineation for the Banning Ranch development project. I wish you would refuse the project completely but if that is impossible then I'll settle for the previous restrictions.

I have lived in Newport Beach with my husband and two sons since 1992 and attended college at UCI in 1975 and 1976. I have obviously seen a great deal of development and population growth here since then. But in the past two or three years I have felt an explosive invasive change in the traffic all around Newport Beach and Costa Mesa. I used to be happy I did not live in Irvine because it was so difficult at times to drive up main roads like Culver in terms of long lights and heavy traffic. Now traffic signals have been altered all over my area of Newport Beach which makes waits at many of my local intersections interminable and there seems to be heavy traffic at many, many more times of the day and night in many, many places around town. There is absolutely no doubt in my mind that this is due to absurd amounts of new Development in Newport Beach and a seemingly burning desire on the parts of city and state government to cover every green space with homes and hotels and retail space. It disturbs me enormously that you are helping to destroy the magnificent previously peaceful friendly roads and environment of Newport Beach. I used to drive and be astounded at the politeness of drivers and the easiness of driving to places from my home: divided roads, right turns at red lights, separate left turn signals. Now although those things are still physically there, the timing of the lights and the enormous population growth makes me and my family feel as if we we might as well be living in Los Angeles in terms of aggressive drivers and traffic woes. Please try to remember why people moved to beach communities in the first place and respect our wishes to keep our wonderful home city as wonderful as it always was. Thank you very much for your time and consideration.

Lori Wenger
Sent from my iPhone

From: [Helen Maurer](#)
To: BanningRanchComments@Coastal
Subject: comment
Date: Friday, May 06, 2016 10:48:41 AM

Please do NOT increase the area open to development. This was supposed to have been settled.

From: [William Harader](#)
To: BanningRanchComments@Coastal
Subject: Coastal Commission Staff should stick with their original ESHA delineation
Date: Friday, May 06, 2016 10:14:57 AM

The recently released CCC staff report for the upcoming May 12 hearing, shows a disappointing change in the CCC staff's position. While appropriately dismissing a 895-home interim proposal submitted by the developer after the Oct. hearing as inconsistent with the Coastal Act, the CCC staff, in worrisome change of position, decreased the amount of recognized ESHA on the site and expanded the potential development area from 11.5 acres to 55 acres(an almost five-fold increase from October's report). Furthermore, the CCC staff is now recommending approval of the conditioned project proposal.

The CCC staff was able to decrease the amount of recognized ESHA by taking the already-high bar establishing ESHA and making it even higher. The number of vernal pools recognized by staff have been cut by almost 75% and amount of native grassland has similarly been shaved. The remaining uplands would be extensively fragmented by roads and structures, leaving them unsuitable for Burrowing Owls that currently winter on Banning Ranch and very few other places on the coast.

The marked increase in potential development area is not acceptable and that the CCC staff should stick with their original ESHA delineations
Please consider carefully CCC staff and stick with the original ESHA delineations.

Thank you,

Bill Harader

From: [Sandie Frankiewicz](#)
To: BanningRanchComments@Coastal
Subject: BR development
Date: Friday, May 06, 2016 3:53:08 PM

Dearest Coastal Commissioners,

I am an owner of two properties, one in Newport Beach, less than 50 feet from Banning Ranch and the other is under 1,000 feet, located in Costa Mesa.

Due to the toxin air we will face for 10 years it will take to complete the project, along with additional thousands of estimated cars passing through and by my two homes and a another big issue is the water this project intends to use IS MORE THAN ENOUGH TO CONSIDER DISAPPROVING THE PROJECT!

I know money talks!! And money and revenue will all go to the City of Newport Beach. Newport Beach should consider all of the lawsuits they will face when many of the residents become ill from the toxins, dust and pollutions beyond the acceptable limitations.

Oh, and finally, I am concerned with the amount of "HEADS UP" time we will receive when you notice us that our house will be taken from us when you widen W19th street for the connecting roads that the project will demand in order for people to get to the 55 freeway. It currently takes us approximately 10 minutes to get out of our driveway on Monday – Friday during 8:00 – 8:30 while kids are making their way to the local schools and commuters heading to work. I can't imagine what another 10s of thousand more vehicles will be like. Can you?

[Sandie Frankiewicz](#),
Office Manager
R.C. Edwards & Company, LLC
400 North Tustin Avenue, Suite 400
Santa Ana, CA 92705
714-543-8385 fx 714-542-4704

From: [Carol Furuani](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch Proposal (Ap. 5-15-2097)
Date: Friday, May 06, 2016 12:37:28 PM

To the CCC,

I believe the proposal should be rejected as the diminishing of coastal wildlife habitat should end. Development has had it's way already, especially in Newport Beach, with homes built all the way down beach cliffs and increased traffic density affecting quality of life.

Shaving away more coastal wildlife habitat for houses and roads to benefit people who can move about more readily to find a place to live than the wildlife, which already have very limited alternatives, just does not make sense.

Is a land swap possible to address the financial drive to develop this land so that it's protected and continues to support and help increase the natural biodiversity of our coastline?

Regards,
Carol Furuani
Lakewood, CA

From: Ron42554@aol.com
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 3:28:07 PM

Dear Sir/ Madam,

I know this is past 2pm so you probably will ignore my comment, especially because it is against the Banning Ranch Project. The project will increase traffic with no relief for the congested roads. This will allow for more air pollution along the coast as well as run off from the streets.

Also we remain in a drought and this project will put more pressure on our water supply.

Please don't ignore the will of the people to satisfy the developers pocketbooks.

Thank you.

Ron Frankiewicz

From: [Don Ronaldson](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 11:48:00 AM

I am a long time resident of Costa Mesa and Newport Beach. Development is not new to us, nor is the increased congestion.

What is new to me is the willingness of those charged with enforcing the Coastal Act to interpret Environmentally Sensitive Areas restrictively, so that less area is protected.

I infer from the changes from the October report (increasing the potential Banning Ranch development area) and the overhaul of the commission's administration a developer's thumb on the scale of determining what is "rare or especially valuable."

I urge the commissioners to deny the project this time and insist that the project not be approved until it is consistent with the Coastal Act, as interpreted in a way to promote the permanent protection of the state's natural and scenic resources.

Don Ronaldson

From: kwalt@cox.net
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 10:03:56 AM

Please protect the open space provided by Banning Ranch along the coast.

Kevin Walt

From: [Judy Meade](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 10:01:46 AM

To whom it may concern,

Please do not destroy the natural habitats at the Banning Ranch site. California will soon be without our most treasured asset - coastal open areas set aside for the public, and, most important, for animals, birds, and flora.

An increase in potential development area at Banning Ranch is not acceptable. The CCC staff should stick with their original ESHA delineations at a minimum.

Judy Meade

Sent from my iPhone

From: [Shannon Crossen](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 9:59:38 AM

Dear CCC,

The marked increase in potential development area for Banning Ranch is not acceptable whatsoever and your staff must stick with your original ESHA delineations.

This is some of our last coastal undeveloped space in Orange County! I hope that you realize the extreme gravity of the situation. Once land is developed it cannot be undone. Please keep this and the law in mind and be wise in your decisions.

Concerned constituent

From: [Karen Sas-Arnold](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 1:35:05 PM

I am extremely upset with the new proposed plan which shows increase in the development area. This is not acceptable! The CCC staff need to stick with their original ESHA delineations!!!

Concerned Citizen

Karen Sas-Arnold

From: [Lisa Lawrence](#)
To: [BanningRanchComments@Coastal](#)
Subject: Banning Ranch
Date: Friday, May 06, 2016 3:23:39 AM

To Coastal Commission,

The marked increase in potential development area is not acceptable and the staff should stick with their original ESHA delineations.

Sincerely,

Lisa Lawrence
1014 W. 19th St
Costa Mesa CA 92627
Lrlawrence@prodigy.net

Sent from my iPhone

From: [Gary Ranes](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 12:30:48 PM

The CCC should stick with their original ESHA delineations.

From: [ryan long](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 3:22:02 AM

Good Day,

I recommend that this project be dramatically reduced and the oil wells shut off. This project affects thousands of people currently living in the surrounded area and the current proposals from the developers and oil company are reckless. It is our responsibility to preserve and protect open space land and our environment. We need to become an example to the state and country that profit does not come first.

Thank you,
Ryan
Local resident

From: [Lynn Friedman](#)
To: BanningRanchComments@Coastal
Cc: [Lynn Friedman](#)
Subject: Banning Ranch Proposal
Date: Friday, May 06, 2016 3:58:38 PM

Dear Coastal Commission Committee Members,

Banning Ranch is the last large open land parcel in what is quickly becoming a very urban built-up coastline in Southern California.

With more and more people coming and living and/or visiting Orange County's coast it is more important than ever to hold on to this open space.

This is especially important as more people are walking, hiking and enjoying the open spaces as our society increases its awareness of the need for fitness, de-stressing, enjoying the out of doors.

This project should NOT be approved until it is consistent with the COASTAL ACT.

The **increase** in potential development is NOT ACCEPTABLE. The CCC needs to stick with their original ESHA delineations and restrict the development area to the 11.5 acres it had spelled out in that October report.

We care. We live here (I have lived here all of my 60 years). We are spending all this time and effort to save this precious area because it is THAT important to us. We have a Coastal Act in place so that this precious coast has protections. It is your job to be sure that it is protected under the Coastal Act.

Do YOUR JOB and follow the intention of the Coastal Act. Protect Banning Ranch by following the Coastal Act. All is up to you doing your job: all the vernal Pools, all the Burrowing Owls, all the Native American sacred sites, all the wildlife habitat, all the citizens who live and love this area depend upon you upholding the ACT.

Sincerely,
Lynn Friedman
350 Vista Baya
Newport Beach 92660

From: [Rob Snyder](#)
To: BanningRanchComments@Coastal
Subject: Banning ranch proposal
Date: Friday, May 06, 2016 11:37:19 AM

The newly updated proposal from staff to increase development area is wholly unacceptable. Keep Banning Ranch open and protected!

Sincerely,
Robert Snyder
Rancho Palos Verdes, CA

From: [Mary Clarke](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch ESHA's
Date: Friday, May 06, 2016 7:45:08 AM

I hope the Coastal Commission 's change about sensitive areas will be explained the 12th. I don't understand how ESHAs can change so much since October's view. Sounds like the Coastal Commission is selling out the people for a developer instead of protecting the coast.
Mary Clarke

Sent from my iPad

From: cspenger@suddenlink.net
To: BanningRanchComments@Coastal
Subject: Banning Ranch ESHA
Date: Friday, May 06, 2016 2:11:28 PM

To: California Coastal Commission

The marked increase in potential development area at Banning Ranch is not ecologically sound. Vernal pools, for instance, are extremely rare in California and deserve preservation in their entirety. The increase in potential development area is more related to politics than to science, and would be counterproductive to preserving California's beautiful coastal environment.

Yours truly,
Constance Spenger (former 40-year resident of Orange County)
115 Elmcrest Drive
Big Pine, CA 93513

From: lstrope@socal.rr.com
To: BanningRanchComments@Coastal
Subject: Banning Ranch Development
Date: Friday, May 06, 2016 10:21:59 AM

I have lived in California with my family since 1960. I am a practicing physician here. I know many of my patients are concerned about Banning Ranch. I have walked through the area many times, listened to the owls in the dusk, seen an occasional raccoon and skunk, and of course the rabbits and squirrels. The area has been invaluable in teaching my children about the delicate balance of a biological habitat. It is already a very small area with too much impingement of suburban developments.

I won't be able to attend the hearing myself on May 12th, but I want to express our strong opposition to the most recent revised project. The residential and resort areas are broken up into islands of development which are certainly not in accordance with the intent of the Coast Act.

I don't think the impact can even be accurately foreseen in that situation. Once built, it would never be able to be remedied. Please stand firm with your earlier assessment from the Fall. It was very sad to even imagine those 11 acres given over to development, but it was quite shocking to see the more ambitious revised plan.

Don't fail to protect our small treasure of California coastlands. Developments we have in plenty.
Loreen Strobe, MD

From: [Wayne Weber](#)
To: BanningRanchComments@Coastal
Subject: Banning ranch denial
Date: Friday, May 06, 2016 1:32:12 PM

Dear coastal commission members:

I don't understand your recent recommendation for approval of the conditional project proposal for Banning ranch.
Please reconsider and deny the project until compliance with the coastal commission act.

Sincerely,

Wayne Weber, M.D.
1835 Newport Blvd. A109
Costa Mesa, Ca. 92627

Sent from my iPad

From: scott_tracy
To: BanningRanchComments@Coastal
Subject: Banning Ranch Comments
Date: Friday, May 06, 2016 8:50:14 AM

Dear Coastal Commission,

I find it hard to believe that the latest staff report increases the proposed development footprint nearly 500% from the previous CCC staff report.

Beyond the many problems with the proposed development such as long-term traffic on PCH and 19th Street (and elsewhere), intrusion on native nation sacred sites and overload of current water and sewer service, I recently learned of a new issue. Burrowing owl habitat would be threatened. Please watch or re-watch "Hoot!" prior to the May meeting. It is a cute, not-animated movie I believe by Disney about the Burrowing Owl.

Thank you for your consideration,

Scott Tracy

From: [Birute Ranes](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 12:27:32 PM

The CCC should stick with their original ESHA deliniations. The burrowing owl has a right to his environment too. There is plenty of developed residential areas for humans.

Sent from my iPhone

From: [James & Nancy Turner](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Friday, May 06, 2016 1:48:24 AM

Please do not develop this property-..We are over populated now and out of space to breathe....We need our natural environment to keep our souls alive...Stop this nonsense of development so the developers can get richer than they are. Thank Goodness Castaways Park was saved for us humans..Now please do the same on this property...WE need empty space,.NOT Hotels, houses, apartments and whatever they are trying to ruin the coastal area. Stop these projects..Nancy Odell Turner- I am a resident of the New[port-Mesa area for 50 years...STOP>>>this development.

From: [Gerard Proccacino](#)
To: BanningRanchComments@Coastal
Subject: Application No. 5-15-2097 (Newport Banning Ranch, LLC , Newport Beach)
Date: Friday, May 06, 2016 1:01:01 PM

Application 5-15-2097

OPPOSED

Greetings California Coastal Commission, Commissioners and Staff,
I am a proud 44 year resident home owner of Lido Sands, Newport Beach, Ca. Lido Sands is a cozy mid century community in West Newport Beach that lies along PCH directly in front of the devastatingly intrusive project of Banning Ranch. I want to share my thoughts of why I pray you do not approve the application of the Banning Ranch Development.

I was present at the October 2015 meeting where I commend you folks for being very generous in giving the applicant another chance to present a project that would not only be kinder to the precious 401 acres ESHA but the quality of life for the residents of West Newport Beach. I do not believe the applicant appreciated or respected that second chance.

Staff has stated among numerous other conditional agreements that "Significant changes to the development plan proposed by the applicant in order to achieve consistency with the Coastal Act include elimination of Bluff Road as a through connector from 17th Street to Pacific Coast Highway". Well the applicant showed no respect for that condition in it's recent ,full page, ad in the Daily Pilot newspaper stating, "A downsized road connects West Costa Mesa to the beach". They should have continued and include connects all cities up and beyond West Covina. They are promoting Bluff Rd. as a thoroughfare that will dump thousands of auto, motorcycle, tractor trailer, truck, and bus trips daily. PCH is like a river ready to crest and overflow. It can't take any more. The intrusive intersection at PCH is less then a mere 300 yards from the massive PCH, Superior Ave. intersection and not supported by Cal Trans who frowns on major intersections that close together.

No respect for Staff recommendation. If, God forbid, this road and intersection are built I see no mention of mitigation of the sound, light and air pollution. No mention of heightening the existing sound wall and/or planting sound absorbing foliage. It is often forgotten that Newport Beach residents are fortunate not to need air conditioning, and believe me we pay for that

privilege. Many nights we sleep with windows open for fresh air rather than refrigerated air. How destructive to our quality of life with more noise, light and air pollution. Bluff Rd. was denied, by the Commission, to Newport Beach as a road into Sunset Ridge Park. How can it even be considered now? What has Mother Nature changed with the ESHA since then?

At the October meeting Commissioner Bochco stated there are “very, very, very” strict parameters concerning ESHA. Commissioner Shallenberger stated “ESHA is the strongest policy in our act”. Is it or is that what’s changed?

During closing comments in October Chairman Kinsey was “specific” about a target of 90% to be saved of the last, one of a kind, sensitive properties in Ca.. If my math is correct Chairman Kinsey was deliberately specific about only 10% of the property being developed. He referred to Marin county where only 5% of similar properties are allowed development. If I read correctly the applicants latest proposal is a “city” style development of 51.9 acres of which 8.6 acres is a resort, hotel, commercial, retail business district. Let me return to my math again. Of 401 acres 10% development would be 40 acres. The applicant is proposing 51.9 acres, 11.9 over what Chairman Kinsey was specific about. Again no respect for, their second chance, the Commission and Staff. If the business district were denied it would eliminate 8.6 acres and be close to Commissioner Kinsey’s 10% and with no road/ intersection to PCH. In October I called the project “The City of Banning Ranch” with a resident population greater than Bishop not accounting for the thousands of transit visitors daily. It is still a proposed city, just a little smaller.

I am totally disappointed with the City of Newport Beach, the County of Orange and the state of California for not coming together to work diligently with it’s citizens to devise a working plan to purchase the property, at a fair market price, and to restore it to God’s natural beauty as open space.

I strongly oppose this massive project as proposed by the developer. They have shown little concern for the strong suggestions put forth by the Commission and Staff, even given a second chance. They have presented no mitigation to the citizens of West Newport for the negative impacts on our quality of life. I urge you to please deny this project as proposed. It is too massive. It is more, more, more. Where does this all stop? Every corner and empty parcel in Orange County is being developed with massive residential condos, apartments, commercial, and residential. Where do we put the

people? Where do we put the vehicles? You folks have the power to at least slow it down. I read that there are at least 2005 letters of opposition and if I'm understanding correctly an additional 1,926 "form" letters in opposition totaling 3,931 opposing letters with only 242 in support. Please honor the powerful message being sent. Please deny the proposed Newport Banning Ranch project.

Thank you for your consideration.

Respectfully,

Gerard Proccacino

Newport Beach, CA



Virus-free. www.avast.com

From: [becky.hart](#)
To: [BanningRanchComments@Coastal](#)
Subject: 11.5 acres to 55???
Date: Friday, May 06, 2016 4:00:23 PM

Are you crazy? How can you do this to both nature and the HB residents? We are already inundated with apartments at Bella Terra and on Beach Blvd and the now huge Pacific City. When is it going to stop?? No, not everybody can live here....really. I vote for NO building whatsoever and sure as hell no 55 acres!!

Rebecca Hart

Sent from my Verizon 4G LTE Tablet

From: [Miguel Zamarripa](#)
To: [BanningRanchComments@Coastal](#)
Cc: [davan.maharaj@latimes.com](#); [cdizikes@sfchronicle.com](#); [editorial@nytimes.com](#)
Subject: 11.5 acres is NOT equal to 55 acres of \$50million dollar project on ESHA Banning Ranch
Date: Friday, May 06, 2016 11:26:31 AM

CCC representatives,

Last October you instructed for this project to be within 11.5 acres, why do you almost quintupled it to 55 acres - why?

So that billionaires can make 100 Million more on their project and destroy 40 more acres of Banning Ranch not including traffic, roads, trash, construction equipment, etc?

Why do the people and the coast always has to give way to Billionaires?

No wonder voters are disgusted with politicians and the establishment.

You represent the establishment in the pockets of politicians, lobbyists, and Millionaires that run this country, while the people and the environment get left out.

CCC, do the Right Thing and limit Banning Ranch destruction of ESHA to 11.5 acres... no more!

Miguel Zamarripa
1904 Harbor Blvd. 129
Costa Mesa, CA 92627
mzamarri@yahoo.com

(6 year Costa Mesa resident and 35 year Orange County resident, voter and U.S. citizen)

From: [Gail L Millage](#)
To: BanningRanchComments@Coastal
Subject: 11.5 acres increased to 55 acres
Date: Friday, May 06, 2016 9:07:18 AM

Good morning Ladies and Gentleman:

I am not pleased with the increase in acreage to build more homes. I live on Victoria Avenue in Costa Mesa on Westward Lane and I have to listen to the sounds of cars and trucks 24 hours a day. Enough noise already. Most of my neighbors have sound proof windows which I am working on getting some installed. I have to keep a fan running 24 hours day to cut down on the noise so I can sleep and watch television without the sound up as loud as it can go. I was present at the meeting in Long Beach in October and pleased to hear of your decision to be considered at that time. My neighbor next door opened her windows for fresh air and could not believe the noise. Fortunately, I have an air conditioner I can use!

I was present at the meeting in October in Long Beach and was pleased to hear what your staff would take into consideration. There are two new sets of homes that have been constructed in this area within the last two years. One project is completed and another is still under construction. That will add to the traffic and noise in the area. Many people love to walk in this area for exercise, fresh air, and to enjoy the view. I love seeing the plants, the water, the birds in this area. I see fish jump of water. i love seeing the ducks swimming on the water. Sea gulls are flying around alot. I advise you to take another tour in this area. Let this area be!

I live at 1058 Westward Lane in Costa Mesa, California. Leave this area intact. We have enough homes and traffic in this area.

Thank you for your time and consideration.

Gail L. Millage

From: [Andrea Stone](#)
To: BanningRanchComments@Coastal
Subject: Save Banning Ranch
Date: Thursday, May 05, 2016 12:14:24 PM

Dear Honorable Chair Kinsey, Commissioners and Staff,

I am emailing you to please uphold the Coastal Act and keep all of Banning Ranch an open space. There is very few wildlife area left in Newport Mesa area and Banning Ranch is the last large unprotected coastal space in Orange County.

Banning Ranch is home to me. I lived a block away from Fairview Park during college and have future plans to move back in the area. I also currently commute everyday past Banning Ranch and enjoy the beauty I see! If Banning Ranch is destroyed, the construction will make commuting much harder, noise traffic and air pollution will increase. Traffic will also double once development takes over. As a previous resident of the area and hopeful future resident, please preserve Banning Ranch from being turned into a mall and grounds for an oil field. The species left are worth much more than the land can offer developers.

Thank you.

Sincerely,
Andrea Stone

From: dor.nazari@gmail.com
To: BanningRanchComments@Coastal
Subject: Preserve what little habitat OC has
Date: Thursday, May 05, 2016 1:23:05 AM

Have a great day



May 5, 2016

Item Th11c

California Coastal Commission
45 Fremont Street
Suite 2000
San Francisco, CA 94105-2219
BanningRanchComments@coastal.ca.gov

Re: Opposition to Newport Banning Ranch Application

Dear Commissioners:

The Center for Biological Diversity (“Center”) provides these comments to express our grave concerns about the proposed Newport Banning Ranch project, Application No. 5-15-2097 (Newport Banning Ranch, LLC, Newport Beach), which will be considered by the Commission on May 12, 2016. The proposal from the project applicant, even with the proposed changes and conditions identified by staff, would degrade and destroy important and irreplaceable coastal habitat and wetlands; including rare coastal scrub. The project will also harm federally endangered species by harming California gnatcatcher critical habitat and vernal pool habitat of the San Diego fairy shrimp. Banning Ranch is a massive development project on the largest tract of coastal open space in Southern California, and this intensive residential, commercial, and resort project does not pass legal muster and should be denied by the Commission.

Our objections to the project include, but are not limited to: (1) the size and density of this development are incompatible with such an environmentally sensitive coastal property; (2) approval would undermine the Commission’s mandate to protect Environmentally Sensitive Habitat Areas (ESHA); (3) the proposed roads would fragment and impair the habitat values on site; (4) property owners are required by their current oil field abandonment plans to restore and enhance ESHA on the site rather than further developing the site; and (5) the proposed project may undermine state and federal protections for special status and listed species, designated critical habitat, and rare plant communities. Further, the Center is concerned that the project proponents may have interfered with the independence and scientific integrity of the approval process through extensive ex parte communications and otherwise.

1. The massive project is incompatible with sound coastal development policy.

The Coastal Commission’s mission is to protect and enhance the California coast and ocean, and the Legislature enacted the Coastal Act to “protect the ecological balance of the coastal zone and prevent its deterioration and destruction.” (Pub. Res. Code § 30001.) Approval of this project

runs afoul of the Coastal Act, its goals and local coastal plan requirements. The proposal to build 13.4 acres of roads, 895 residential units on 43.4 acres, 45,100 square feet of commercial use, 3.9 acres of resort, and a 75-room hotel and 20-bed hostel along with ongoing oil operations is incompatible with these policies because it will destroy and fragment important and increasingly rare habitats in the coastal zone—rather than achieving a balance, the proposed project would sacrifice ecological values to development.

Approving a new massive development and ongoing oil operations on one of the largest undeveloped pieces of coastal property in Southern California is unsound coastal development policy. As Commission staff pointed out in its April 2016 report and the one it completed in October 2015, most of this 401-acre site is made up of protected wetlands, fault-zones, and Environmental Sensitive Habitat Areas (ESHA), protection of which is a top mandate for the Commission under the Coastal Act.

The staff's revised recommendation in the April 2016 report that 55 acres of land can be developed along with an additional 11 acres for continued oil extraction operations is a significant deviation from and expansion of the 18 acres it identified as non-ESHA land back in October 2015. The October staff report acknowledged the significant harmful impacts of the project on the sensitive habitat:

The proposed project would have significant adverse impacts upon terrestrial and vernal pool ESHA, including impacts to important/rare upland habitats and wildlife species that are an important part of the existing functioning ecosystem that includes both the uplands and lowlands habitat areas.

Staff is now recommending approval of the project if proponents can squeeze it into the new footprint proposed by staff, which would require scaling back of the current proposal.

The Commission should not and cannot make a finding that the proposed project is consistent with the California Environmental Quality Act (CEQA). The staff report also notes that going beyond the 55 acres it identified would be a violation of state law: "In addition, the Commission must make findings that the approved project would be consistent with CEQA, specifically including a finding that the project approved is the least environmentally damaging alternative. The proposed project is not the least environmentally damaging alternative."

While we agree with the staff position that the Commission may not approve a project that allows development within ESHA and wetland areas that have been identified by staff, we continue to have serious concerns about whether the new analysis properly identifies and fully safeguards ESHA and protected species on the property.

For example, the project threatens the coastal California gnatcatcher, which thrives in the coastal scrub on this property. The rare bird is threatened with extinction by the rampant overdevelopment of Southern California, and this project further imperils it and would destroy and adversely modify its critical habitat.

The coastal California gnatcatcher was listed as threatened under the U.S. Endangered Species Act in 1993 and it was given critical habitat protections in 2007, habitat that includes Newport Banning Ranch. The gnatcatcher is a tiny gray songbird considered by biologists to be an

indicator species of the overall health of this ecosystem. That habitat was largely, if inadvertently, protected for the gnatcatcher by the decision to devote this property to oil production and thus limit development and general public access.

Now that the property owners have made their money off of oil and sucked most of their wells dry, they want to profit from paving over the property and building an exclusive coastal resort and homes for the wealthy. They want to destroy the last great piece of coastal habitat in Orange County which is home to the gnatcatcher, fairy shrimp, and other coastal California wildlife.

But extensive, invasive, urban-style development of this property isn't allowed by our environmental laws and it shouldn't be allowed by the Coastal Commission, which was established to protect our valuable coastal resources and public access.

2. The revised recommendation ignores identified ESHA and allows ESHA to be developed in violation of the Coastal Act, with damaging environmental and legal consequences.

Under the Coastal Act, an “Environmentally sensitive area” means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.” (Pub. Res. Code § 30107.5.) It is undisputed that Banning Ranch contains such habitats including designated critical habitat for the California gnatcatcher and San Diego fairy shrimp, wetlands, and increasingly rare coastal sage scrub.

The Coastal Act mandates protections for ESHA.

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

(Pub. Res. Code § 30240.) Therefore, whether habitat on the site meets the ESHA criteria is a critical threshold question in determining whether a proposed project would be a permissible use within those areas and the significance of any impacts of a proposed project.

Previously, the Coastal Commission staff found the applicant's identification of ESHA faulty and proceeded with further analysis to identify ESHA on the project site. That resulted in a recommendation in the October 2015 staff report that the project's footprint be reduced to 18 acres to comply with the Coastal Act and avoid ESHA. In a recent reversal, the new staff recommendation in the April 2016 report relies on the old ESHA study the staff found inadequate and recommended an area more than three times that size for development. The proposed roads staff now endorses will significantly fragment habitat and undermine larger intact ESHA. The Center is concerned that ex parte communications and political pressures exerted

behind closed doors rather than in an open public process may have influenced the reversal by staff.

There are serious concerns that the approval of Banning Ranch would contravene the law and undermine ESHA provisions. Case law prohibits ESHA from being divided or relocated to satisfy the desires and designs of developers. Designation of ESHA and development of such areas are not discretionary decisions afforded to the Commission, but are based on legal standards.

The California Court of Appeals affirmed that ESHA places strict requirements on the Commission in *Bolsa Chica Land Trust v. Superior Court*:

Importantly, while the obvious goal of section 30240 is to protect habitat values, the express terms of the statute do not provide that protection by treating those values as intangibles which can be moved from place to place to suit the needs of development. Rather, the terms of the statute protect habitat values by placing strict limits on the uses which may occur in an ESHA.

...

There is simply no reference in section 30240 which can be interpreted as diminishing the level of protection an ESHA receives based on its viability. Rather, under the statutory scheme, ESHA's, whether they are pristine and growing or fouled and threatened, receive uniform treatment and protection.

(*Bolsa Chica Land Trust v. Superior Court* (1999) 71 Cal. App. 4th 493, 507-508 (citations omitted)). In fact, the Bolsa Chica property, located six miles north, had many of the same land features as Banning Ranch. Here, approval of the proposed massive development at Banning Ranch would destroy ESHA and violate the Coastal Act's requirement that ESHA shall not be disrupted.

3. The area slated for the Banning Ranch development was supposed to be rehabilitated and restored from prior oil developments, and it is improper for the Commission to rely on unlawfully degraded conditions to approve more development.

The oil operations on the Banning Ranch site are supposed to be restored. "When the oil production ceases (either through the termination of use of single wells or the entire operation), a variety of regulations come into play mandating that proper oilfield abandonment and infrastructure removal activities be conducted and completed," staff wrote in its October 2015 report, noting Newport Banning Ranch has entered into a contact with those operators to assume legal responsibilities for that cleanup and restoration obligation.

Rehabilitation of the site was already going to be a difficult task given the oil production work that began in the 1940s, peaked in the 1980s at 1.2 million barrels of oil being produced by 300 wells, before steadily declining to a few dozen wells today. Making the task of rehabilitation significantly more difficult is the history of unpermitted development and habitat removal in violation of the Coastal Act and environmental laws on this site. Indeed, between 1992 and 2012,

the U.S. Fish & Wildlife Service (USFWS) documented loss of 7.31 acres of native coastal bluff scrub from Banning Ranch.

The site has been increasingly degraded and not restored as required. Extensive unpermitted mowing, removal of coastal scrub, and clearing patches of coastal prickly-pear, California encelia, and other habitat-supporting vegetation goes back decades. As a result in August 2014, former Coastal Commission Director Lester issued West Newport Oil Company and Newport Banning Ranch LLC an 11-page Notification of Intent to Commence Cease and Desist Order and Restoration Order Proceedings and Notification of Intent to Record a Notice of Violation:

Based upon the information that staff has reviewed to date, it has become abundantly clear to staff that a number of sensitive and native plant communities and wildlife species thrive on the properties. Accordingly, the potential that development activities on the site, particularly unpermitted development activities, could have impacted and could be continuing to impact sensitive habitats and species, including ecologically significant vegetation, became more salient.

The Commission followed up that warning with Consent Cease and Desist and Consent Restoration Orders the following year, although the damage to some important ESHA habitat on the property had already been done.

A developer should not be permitted to rely on past mismanagement of property and habitat destruction to justify further degradation and development later. It is also improper for the Commission to rely on unlawful destruction of habitat or failure to restore habitat to eliminate ESHA or approve additional acres for development.

4. Other recent events, such as Dr. Lester's ouster as Executive Director and extensive ex parte communications, bring into question the independence and integrity of the approval process for the Banning Ranch project.

In its April 2016 report, Commission staff described extensive work it did following the October 2015 hearing to accommodate this project.

It is of concern that the new recommendations, which increase the amount of development three-fold, were developed while Commissioners who publicly expressed support for the Newport Banning Ranch project were in the process of firing Commission Executive Director Charles Lester, an action that environmental groups, Commission staff, and several California media outlets criticized as an attack on the independence and professionalism of Commission staff (see "["Disgrace' isn't a strong enough word to describe Coastal Commission meeting,"](#)" Los Angeles Times, 2/13/16, among many other media accounts of the Lester's ouster and the politics behind it).

The staff significantly changed its recommendations and analysis after the October 2015 hearing on Banning Ranch. "Following the October hearing, staff worked diligently to verify the sensitive resources on-the-ground, identify and map the site constraints, and provide them to the

applicant in an effort to create a revised proposal that avoids wetlands, ESHA, fault-zones, bluff top encroachments, and other site constraints,” reads the new April 2016 staff report.

When this project went before the Commission in October 2015, Commissioners Wendy Mitchell, Martha McClure, and others criticized Director Lester and Commission staff for trying to protect ESHA that had already been damaged over the years. Those same Commissioners then led the effort to fire Lester in the face of overwhelming public support for him and the independence of Commission staff.

The Center is also informed that one or more Commissioners attended an extensive ex parte site visit with the developer and may have directed staff to change their analysis based on the communications made outside of the public process.

But neither removing the director and thus sending a chill through the professional staff, nor heeding the wishes of the developer, can obviate the clear legal requirement for this property owner to restore this land to the state it was in before oil extraction operations began. The applicant’s proposal to substitute grading 2.77 million cubic yard of soil and constructing almost 1,000 buildings for “restoration” of the site is unlawful and the Commission should not accept it.

This decision will be considered by many observers to be a test case for whether the Commission will retain its integrity in the wake of Dr. Lester controversial removal from his position. The Center and dozens of other conservation and coastal organization will be watching this decision carefully, and we intend to ensure that the Coastal Act and its ESHA protection are not eroded.

In conclusion, the Center urges the Commission to reject the proposed development at Banning Ranch, both as proposed by the developer and with the proposed changes suggested by staff in the April 2016 report, as inconsistent with the Coastal Act and other laws.

Sincerely,

/s/Steve Jones

Steve Jones

- Firing of the Commission’s executive director in closed session on what appear to be bogus grounds
- Remarks by Commissioners during the April ESHA Workshop indicating unhappiness with Coastal Act ESHA requirements
- An irregular and unprecedented disavowal by the California Resources Agency – on thoroughly specious grounds – of completely appropriate biological input from the Department of Fish and Wildlife¹

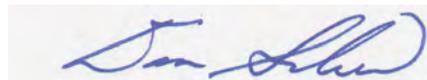
Biologically, the reduction in ESHA particularly errs by not including sufficient land to create viable burrowing owl wintering use areas for this sensitive species. The small patches of grassland and vernal pool habitat that would remain on site are not in a configuration or size useful to the owl.

Furthermore, the preserve design being recommended does not comport with the principles of conservation biology. It does not establish unfragmented and intact habitat blocks for the species identified through the ESHA process. Both the staff recommendation, as well as the applicant’s April 2016 proposal, consist of many fingers of development and severely fragment *both* upland mesas. Indeed, what is before you is the worst of all worlds – neither strict enforcement of ESHA nor a reserve design that reduces edge effects by siting all new development in locations contiguous with existing development.

We call for denial of this project and direction to staff to 1) strictly identify ESHA and 2) preserve large intact habitat blocks on the mesas that are biologically meaningful for the burrowing owl and other species through a site design that places development in the several available locations *immediately adjacent to existing development*. These locations include the areas labeled 12.1, 5.9, 8.2, and 5.7 acres on Exhibit 22 of the Staff Report. The active recreation adjacent to Coastline Community College proposed by the City as an exaction should be converted to housing or commercial development. This is the core of a constructive solution upon which we urge all parties to focus.

Thank you for considering our views.

Yours truly,



Dan Silver
Executive Director

¹ The Departmental October 2015 memorandum supporting staff’s original ESHA determination had ample biological basis and followed proper protocol, yet was denounced by the Resources Agency in public testimony. Similarly, the Agency provided no evidence to support its contention that the Department had completed a thorough Streambed Agreement analysis.

From: [Brad Moore](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Wednesday, May 04, 2016 8:52:11 AM

To Whom it May Concern:

This is the most special stretch in Orange County... Granted, immediate financial gain is available, but long term destruction and quality of life will be diminished. Not that a single voice makes a difference, but it is why I am happy in the otherwise densely populated area.

Best,
Brad Moore

Brad Moore, CTP

Treasury & Risk Manager

MAG | Motorsport Aftermarket Group

17771 Mitchell North | Irvine | CA | 92614

Direct: 949-732-7408 | **Mobile:** 402-541-8955

bmoore@MAGgroup.com | www.MAGgroup.com

From: [Amanda Schwer](#)
To: BanningRanchComments@Coastal
Subject: please say no
Date: Tuesday, May 03, 2016 2:39:07 PM

Hello. My name is Amanda Schwer and I am a physician living in Newport Beach. My home is about 300 yards from Banning Ranch and my workplace (Hoag Hospital) is right down the street. I have watched this debate about whether to develop banning ranch with dismay and disappointment. There is simply no question that this development is a terrible idea for the environment-- both for humans and wildlife. Aside from the destruction of natural habitats and the last vestage of undeveloped land around here, we simply do not have the infrastructure, water or roads to support all these new people. Please say no. Please save my city and county and this beautiful place so many animals call home. ENOUGH IS ENOUGH

Dr Amanda Schwer

This email and any attached files are confidential and intended solely for the intended recipient(s). If you are not the named recipient you should not read, distribute, copy or alter this email. Any views or opinions expressed in this email are those of the author and do not represent those of Newport Diagnostic Center. Warning: Although precautions have been taken to make sure no viruses are present in this email, the company cannot accept responsibility for any loss or damage that arise from the use of this email or attachments.

The materials in this e-mail are private and may contain Protected Health Information. If you are not the intended recipient be advised that any unauthorized use, disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this email in error, please notify the sender via telephone at 949-760-3025 or by e-mail and then permanently delete it immediately.

From: [jacksart](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch oposition
Date: Tuesday, May 03, 2016 11:19:09 AM

If the coastal commission is swayed by the opposition I suggest the following g questions:

1. What do you estimate the total cost of developing the area into an open space/Park?
2. Where can you get that much money? How long will that take?
3. How much do you have now?

Everyone wants open space if someone else pays for it.
This proposal is the best compromise of individual and public needs.

Sent from my Verizon, Samsung Galaxy smartphone



LEAGUE OF WOMEN VOTERS OF ORANGE COAST

Aliso Viejo, Costa Mesa, Huntington Beach, Irvine, Laguna Beach, Laguna Hills, Laguna Woods,
Lake Forest, Mission Viejo, Newport Beach, Rancho Santa Margarita, Seal Beach

California Coastal Commission
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

May 3, 2015

Agenda Item: 11c , May 12, 2016

Oppose: Application #5-15-2097, Newport Banning Ranch LLC

Dear Commissioners:

The League of Women Voters of Orange Coast is **opposed** to the Banning Ranch Development as currently proposed.

- 1) The established policies for California's Coastal Zone, an area of statewide concern, have not been met with regard to environmentally sensitive habitat areas (ESHAs), wetlands, landform alteration, rare ecosystems, endangered species, sensitive biological resources, archaeological resources and bluff and canyon edges.
- 2) Proposed construction and grading areas compromise coastal resources.
- 3) Required public access and affordable accommodations have not been adequately safeguarded.
- 4) The Santa Ana Regional Water Quality Control Board and the Orange County Health Care Agency have not approved a Remedial Action Plan (RAP) for this development proposal. The League supports an RAP that has been approved by reviewing agencies as meeting state standards and providing maximum protection to human health and the environment from the adverse effects of hazardous materials existing on the site. At a minimum, site cleanup should comply with existing law, include measures to safeguard ESHAs and archaeological resources, and employ Best Available Control Technology.
- 5) The proposed project is not the least environmentally damaging feasible alternative.
- 6) There is no certified Local Coastal Program (LCP) for this area and approval of this development proposal could compromise the future development of a certifiable LCP for the area due to inconsistencies of this proposal with the resource protection policies of the Coastal Act
- 7) The project has not received the required permits and approvals from the California Department of Fish and Wildlife, Regional Water Quality Control Board, US Army Corps of Engineers, or US Fish and Wildlife Service
- 8) The development proposal does not protect the overall quality of the environment, enhance neighborhood livability, preserve ecological integrity, or consider the regional carrying capacity of the land or infrastructure, especially with regard to water and transportation.

Thank you for your consideration of our concerns about this project as proposed.

Sincerely,

Barbara Wood, Diane Nied, Grace Winchell, Co-Presidents

From: [Patrick Osullivan](#)
To: BanningRanchComments@Coastal
Subject: Please deny Coastal Development of Banning Ranch (Permit No 5-15-2097).
Date: Saturday, May 28, 2016 2:55:04 PM

Dear Coastal Commision,

I am writing to recommend DENIAL of Coastal Development of Banning Ranch (Permit No 5-15-2097). Please uphold the Coastal Act and protect ESHA (Environmental Sensitive Habitat Area).

Sincerely,

Patrick O'Sullivan
Huntington Beach, CA

Phone: 714.240.8084

From: [Mary Carlson](#)
To: BanningRanchComments@Coastal
Subject: Fwd: Proposed Newport Beach development
Date: Friday, May 20, 2016 5:47:19 PM

At the request of Roberto Uranga, I am forwarding this email to you.

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

From: **Mary Carlson** <marycarlson28@gmail.com>
Date: Thu, May 12, 2016 at 3:58 PM
Subject: Proposed Newport Beach development
To: Roberto.Uranga@coastal.ca.gov

Hello,

I am writing to you as a citizen of Orange County who is very opposed to the Banning Ranch Development being proposed for Newport Beach. Our coastline is so over-developed already, we need to be doing everything we can to avoid developing it any more. I could hardly believe my eyes when I read that the mission of the California Coastal Commission is to "protect and enhance California's coast". In my opinion, this means no more development along our coastline. Period.

If I should be contacting someone else on the Commission other than you (I chose you because you appear to represent the Orange County area on the website), please let me know.

Sincerely,

Mary Carlson
Mission Viejo, CA
[949-380-0744](tel:949-380-0744)

RECEIVED
South Coast Region

MAY 20 2016

May 13, 2016

CALIFORNIA
COASTAL COMMISSION

Dear Members of the California Coastal Commission,

It has come to my attention that The Banning Ranch Property Is threatened with a large development.

We already have water issues, electric grid problems and extensive traffic in the region.

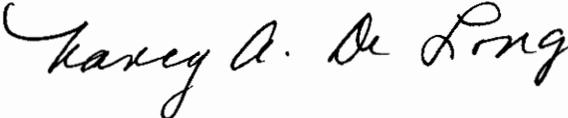
But most of all we don't have enough protected open space for our wildlife and our souls. We need local places to recover from the stress of the city. We need places that are natural.....weeds, birds, reptiles, bugs and all. We have so few left. It would be a shame to lose another one.

It is in your power to help preserve this sensitive habitat. Please don't authorize building and give us time to obtain the necessary funds to keep this property as open space for both active and passive uses.

Thank You,

Nancy De Long

pvnancy@cox.net



From: [Ferry, Michelle](#)
To: [BanningRanchComments@Coastal](#)
Subject: I oppose the development of Banning ranch
Date: Monday, May 02, 2016 5:07:47 PM

Dear Coastal Commission,

The idea of turning this sensitive habitat into a bunch of houses and hotels is painful to hear. I have lived here all my life and places like Bolsa Chica, so often slated for development, remains a jewel of the Orange County coast. I hope that Banning ranch coastal plateau will always be preserved.

The only ones who really want these houses and hotels built are few wealthy developers and their lobbyists. Please take the long view to preservation and not the short view to profit. Once land is developed, we can't get it back the way it was.

Do you want our grandchildren to see a lovely natural area or a parking lot? Keep Banning open.

Sincerely,

Dr. Michelle Ferry
Adjunct Professor of California History, Golden West College.

May 2, 2016

Meg Caldwell, Chairperson
California Coastal Commission
200 Ocean Gate, Suite 1000
Long Beach, CA 90802-4302

Subject: **Application # 5-15-2097; Agenda item, TH-11C, May 12, 2016 meeting**
Site: Newport Banning Ranch
Newport Beach, CA, Orange County

Dear Chairperson Meg Caldwell:

I respectfully request that you re-consider the impacts of this project and deny development.

There have been numerous reasons, previously stated, for not allowing development on this very important site, which I will not reiterate here. Please consider all input by Banning Ranch Conservancy, as I agree with their research and documentation previously submitted.

Without keeping Banning Ranch in-tact as a preserved area, the Orange County parks adjacent to Banning Ranch cannot provide corridors for wildlife and wildlife don't have a chance to thrive due to reduced habitat. Preserving Banning Ranch is critical to creating an adequate sized, long term habitat which will provide numerous benefits to both humans and wildlife.

In addition, as a resident of Orange County/Costa Mesa, I respectfully request that you help us reduce development as this is creating more traffic, pollution and water usage problems. The County is extremely overpopulated and the quality of life has become compromised. It is not a problem that a Bullet Train can solve. It must be solved with long term vision and thoughtful planning.

Your consideration in this matter is appreciated.

Sincerely,

Sylvia Marson
County of Orange, Costa Mesa, CA Taxpayer
(949) 645-9348 email: sylviamarson@sbcglobal.net

cc: Please accept emails as copies:

BanningRanchComments@coastal.ca.gov

Amber Dobson, Staff Analyst, Coastal Commission, adobson@coastal.ca.gov

Sonia Vasquez, Staff Analyst, Coastal Commission, svasquez@coastal.ca.gov

Teresa Henry, Director, Coastal Commission, thenry@coastal.ca.gov

Dave Kiff, Newport Beach Assistant City Manager, dkiff@city.newport-beach.ca.us

Diane Dixon, Mayer, City of Newport Beach, ddixon@newportbeachca.gov

Banning Ranch Conservancy, info@banningranchconservancy.org

From: [Jack Eidt](#)
To: BanningRanchComments@Coastal
Subject: Analysis of Newport Banning Ranch Coastal Development Permit - Wild Heritage Planners
Date: Monday, May 02, 2016 4:31:25 PM
Attachments: [Banning Ranch Alternative Plan Analysis - WHP - 5.2.16.pdf](#)

Dear Coastal Commission:

We appreciate the opportunity to comment on the Newport Banning Ranch Coastal Development Permit now under consideration by the Coastal Commission. Please accept the attached report into the public record, prepared for the Banning Ranch Conservancy by Wild Heritage Planners, Carl Welty Architects, and Blake Whittington Landscape Planner.

If there is any problem accessing this document, do not hesitate to contact me.

Sincerely,

Jack Eidt
Director - Wild Heritage Planners
Publisher - WilderUtopia.com - Coexisting into the Great Unknown
Connect on [Facebook](#) and [Twitter](#) - [@WilderUtopia](#)
Office 323 362 6737



WILD HERITAGE PLANNERS
P.O. Box 50260
Los Angeles, CA 90050
Website: WilderUtopia.com
Email: [Jack.Eidt\[at\]wilderutopia.com](mailto:Jack.Eidt[at]wilderutopia.com)
Phone: 323 362 6737

Analysis of Newport Banning Ranch Coastal Development Permit

Undertaken by *Wild Heritage Planners – Carl Welty Architects – Blake Whittington Landscape Planner*

EXECUTIVE SUMMARY

Following is an analysis conducted by Jack Eidt, Carl Welty, and Blake Whittington on the future of the Banning Ranch site and the suitability of a massive mixed-use development project there proposed by Newport Banning Ranch (NBR) development consortium under review by the California Coastal Commission.

First we analyzed the site, then the development proposed, and finally suggest a series of planning and design guidelines that could shape a project that would meet the needs of the community and the development consortium, while protecting and regenerating the significant ecologic role of this irreplaceable coastal public resource.

Santa Ana River Delta Revitalization. First of all, we see the need to consider the planning and development of this site as integral to the restoration and revitalization of the hydrologic cycle of the Santa Ana River, a vital component of providing water sustainability and security for Southern California. The plan as proposed compromises a significant portion of the upland habitat as well as drainage areas, which would foreclose opportunities to restore the function of the river delta/estuary that has been lost through channelization and human modification of the river. Using the example of the \$1.3 billion ongoing restoration of the Los Angeles River and the further studies of its entire 51-mile course, we foreclose this opportunity of a 400-acre piece of vital habitat at our peril. See Pages 5-9 for a fuller discussion.

Summary of Impacts. Next, we list the most pressing significant and unavoidable adverse impacts to the environment that this latest proposal, even reduced from its October 2015 level, still present for Central Orange County communities of Newport Beach, Costa Mesa, and Huntington Beach, and the beaches, tidelands, marshes, wetlands, and riparian areas of the

mouth of the Santa Ana River leading into the Pacific Ocean. Some of the significant impacts that cannot be mitigated include:

- Destruction of Environmentally Sensitive Habitat Areas (ESHA) and removal of endangered and threatened wildlife species habitat from grading and oil and gas impact land remediation,
- Impacts to water quality and hydrology from storm water runoff,
- Increases in greenhouse gases and violations of the tenets of SB 375 (Sustainable Communities and Climate Protection Act) and AB 32 (Global Warming Solutions Act),
- Impacts to cultural resources,
- Violations of the Coastal Act for the above issues which should be a basis for the rejection of this development alternative.

We look at Environmental/Social/Cultural/Design Impacts of the NBR Plan on Pages 10-11.

Alternatives Analysis. Banning Ranch presents an opportunity to demonstrate that human development can work with nature to enhance and restore sensitive native habitat if designed with a deep understanding of the site's energy and water cycles. This is the concept of Regenerative Design.

The term "regenerative" describes processes that restore, renew or revitalize their own sources of energy and materials, creating sustainable closed-loop systems that integrate the needs of society with the integrity of nature. The present NBR proposal does not approach this level of design sophistication. In a world of impending environmental collapse from global warming-induced climate change and a future facing water and energy resource challenges, we must do better.

In order to avoid impacts to surrounding communities and ESHA while preserving options for river revitalization, we drew up a baseline plan to establish a development pattern that adheres to the existing site topography and respects the intrinsic environmental quality of the site (page 3 and 12-18).

We propose a rethinking of the proposed plan, building in the fundamentals of ecological planning, pioneered with historical projects such as the Sea Ranch (Sonoma County, CA) and Village Homes (Davis, CA), and expanded to consider Regenerative Design with Sustainable Sites criteria that goes well beyond the LEED (Leadership in Energy and Environmental Design) criteria touted by NBR.

See: Benefits of Regenerative Design (Page 12), Design Alternatives for Banning Ranch (Pages 12-18), Alternative Development Models (Page 19-24), Eco-Developments (Page 25-28). and Sustainable Sites Design Criteria (Pages 28-32).



Conclusion. Based on the reality that this proposal violates the California Coastal Act and presents numerous significant and unavoidable adverse impacts to the environment and community, this project should be rejected for a Coastal Development Permit by the California Coastal Commission. We do agree with members of the Commission as well as Commission staff, that a development project that could satisfy the needs and interests of the project applicant, while not only preserving, but regenerating the coastal environmental resources, could be achieved with a more sensitive and comprehensive approach. We use this document to start the discussion.

Wild Heritage Planners collaborates with government, industry, and stakeholders as urban planners, transportation advocates, and environmental sustainability advisors. Jack Eidt, co-founder and Director, is an Urban Planner, Environmental Designer, and Journalist. He advocates a collaborative design process that embodies principles from nature to achieve maximum efficiency, creates a sense of public place, connecting elements of the wild with the urban, while employing a minimum resource footprint.

Carl Welty has over 35 years of experience in the field of architecture. He is a proponent of Regenerative Design, the idea that we can create buildings and communities that generate more resources (energy, water, and building materials, to name a few), and at the same time restore native habitat. Carl is principal of his own firm, Carl Welty Architects, based out of Los Angeles.

Blake Whittington, trained as a landscape architect, has worked in watershed-wide solutions to regional environmental concerns. His projects range from developing funds for and managing Arundo cleanup projects, to advising San Gabriel River recreation enhancement and cleanup programs, to developing multi-purpose projects for storm water cleanup.

Regional Significance of Banning Ranch Site for Comprehensive Santa Ana River Revitalization

Banning Ranch, situated at the Pacific Ocean terminus of the Santa Ana River, has recently been recognized by SB 1390 as a statewide resource through the formation of the Santa Ana River Conservancy. Through concerted action by the State's Coastal Commission and Coastal Conservancy along with all other parties of interest including the 17 agency Southern California Wetlands Recovery Project, the Banning Ranch in its entirety should be valued as the one remaining opportunity for a coastal public resource.

There are very few areas along the southern California coastline with the kind of diverse topography and habitat for wildlife found at this site. Furthermore, the site has unique potential due to its preeminent hydrologic, biologic and ecosystemic role as river delta to a system that meanders 110-miles, draining a watershed encompassing about 3,200 square miles of San Bernardino, Riverside and Orange counties, populated by some 5 million people.

A delta is a body of sediment deposited at the mouth of a river or stream where it enters the ocean. A river creates a delta by laying down sediment or rock debris, called alluvium, made up of gravel, sand, silt, and clay picked up and carried along its course. Rivers can also enter into the sea in the form of an estuary, a partly-enclosed coastal body of brackish water with a free connection to the open sea. Because of the flood control channelization of the Santa Ana River, this natural formation of a delta/estuary has been obliterated.

The site should be preserved without significant development for the following reasons:

- Banning Ranch is the only remaining large unprotected coastal open space in Southern California. If it is developed, it is gone forever.
- The lowland wetland/riparian areas at Banning Ranch present an unprecedented opportunity to revitalize and restore the river delta of the 110-mile Santa Ana River. We must not foreclose opportunities to integrate lessons from exemplary river and wetland revival projects on the Los Angeles River, the Guadalupe River in San Jose, California, the Sacramento and San Joaquin River Delta, and the San Diego River.
- Restored waterways, where significant hydrologic and habitat restoration is combined with public open space and recreation, yield commercial, social and ecosystem benefits for the region and state.
- Banning Ranch's diverse topography of upland mesas drained by arroyos, with numerous vernal pools with rare biotic life, proximate to the sizeable lowland wetlands, creates a remarkable abundance of wildlife. These areas are biologically interdependent. Through significant development of these mesas, the ecologically synergistic effect of topography diversity would be lost forever.

BANNING RANCH AS SITE FOR SANTA ANA RIVER DELTA REVITALIZATION

Banning Ranch could be the site of significant restoration of a functional wetland/watershed complex ecosystem for the mouth and delta of the Santa Ana River. The goals would include:

- Increase education, recreation, open space, and conservation opportunities
- Restore lost aquatic, riparian and freshwater marsh habitat.
- Improve and restore dynamic ecological processes, including the “staircase” between the diverse environments including beach, dunes, surf zone, marsh, intertidal river, vernal pools, riparian, willow forest and grassland scrub
- Restore substrate
- Improve habitat connectivity
- Improve sedimentation processes
- Improve infiltration and recharge
- Rectify the problem of saltwater intrusion into freshwater aquifers
- Become the crown jewel of the Orange Coast River Park Master Plan
- Maximize involvement of OCRP ownership stakeholders, including US Army Corps of Engineers, State of California, OC Parks, OC Flood, the Cities of Newport Beach, Costa Mesa, and Huntington Beach, and Newport Banning Ranch LLC

The environmental imperative:

- Creating habitat in the Pacific Flyway, an important destination for many avian species on the international migratory treaty path
- Stemming and reversing biodiversity loss in the California Floristic Province, one of the top 25 global biodiversity loss hotspots

A number of examples of river revitalizations have been happening around California and beyond include:

The Los Angeles River Revitalization Master Plan

Twenty-nine years ago, L.A. civic leaders, led by poet Lewis MacAdams, founded Friends of the Los Angeles River (FoLAR) as a continuing work of art (and public education as well as politics) to bring the Los Angeles River back to life. After a long process of educating city residents and the political establishment, in 2007 the [LA River Revitalization Master Plan](#) stipulated twenty major opportunity areas, promising to restore habitat, treat urban storm runoff, improve water quality, creating a network of parks and a continuous River Greenway, which will spark economic growth to newly-greened neighborhoods along the 51-mile river.



After eight years of study, the Army Corps of Engineers released its proposal to restore 11 miles of the LA River between Griffith Park and Downtown. The report considered four options, each with the goal of getting the river flowing again, “reestablishing riparian strand, freshwater marsh, and aquatic habitat communities and reconnecting the River to major tributaries,” while maintaining the river’s role in flood control and providing recreational opportunities. Overleaf is a rendering of a restored Taylor Yard from City of Los Angeles.

The plan (detail shown overleaf at Taylor Yard, a former railroad storage site in the Elysian Valley of L.A.) intends to remove concrete and restore a soft-bottom where possible to establish a connected riparian corridor. Neighborhoods would be integrated with the river through a network of greened streets, sidewalks, and pathways. Compromises between ecology and flood control could be implemented through collaboration between the City and County of Los Angeles, the Army Corps of Engineers and numerous regional and local non-profit organizations and public stakeholders in the area.

First San Diego River Improvement Project, San Diego, CA

The first phase of the "First San Diego River Improvement Project" or "FISDRIP" sets a good example for Banning Ranch to follow. In place of a planned concrete channel as envisioned by the Army Corps of Engineers, the project was a successful collaboration by Public Agencies, Engineers, Biologists and Landscape Architects in designing a highly sustainable and functional flood control system that respected and preserved the natural habitat. Originally completed in the late 1980's, this project represents an

excellent example of restorative design within an urban context, testimony to nature's ability to heal itself, survive within a busy transportation corridor and provide human connections to the natural environment.



The first phase of the San Diego River Improvement Project has earned the Landmark Award from the American Society of Landscape Architects and the National Trust for Historic Preservation. Designed by San Diego's Wimmer Yamada and Caughey, the project features created wetland habitats, wildlife preserves, picnic areas, bikeways and pedestrian paths. The project reduced and controlled the seasonal flooding that previously plagued the Mission Valley area each year.

By approving such an intense development project on a sizeable portion of the Banning Ranch, we would lose significant opportunities to restore the environmental service of a biologically-rich keystone ecosystem in deposition of 110-miles of upriver sedimentation flow toward the coast, the delta of the Santa Ana River, will be significantly foreclosed.

Morro Bay National Estuary Program, Morro Bay, California

Morro Bay on the Central California Coast provides an excellent example of a community that worked to protect its coastline through joining the EPA's National Estuary Program. This program could provide necessary funding and political impetus to move a comprehensive Santa Ana River Estuary/Delta revitalization forward, advancing the master plan goals of the Orange Coast River Park while broadening the scope and bringing together the myriad of interests that are advocating for coastal watershed sustainability in Orange, Riverside and San Bernardino Counties.

The rate of sedimentation in Morro Bay was as much as ten times the natural rate, due largely to changes caused by people. The estuary could lose all of its open-water and inter-tidal habitat within 300 to 400 years. The area was designated as a State Estuary in 1994, and the Morro Bay National Estuary Program was established in 1995 after many years of hard work by the community, in particular, the Bay Foundation of Morro Bay and the Friends of the Estuary. The individuals who served in these organizations never quit until they reached their goal of National Estuary designation.

There is also a similar program for restoration of the Santa Monica Bay through the Bay Foundation, as well as 26 other estuaries along the Pacific, Atlantic, Gulf, and Puerto Rican coasts, sponsored by the National Estuary Program.



Summary of Impacts: Newport Banning Ranch Proposal

The sheer extent of the proposal, the intensity of combining a major hotel property with varying types of residential uses, mixed with visitor- and neighborhood-serving commercial uses, goes against the intent of the Newport Beach General Plan, approved by the voters in 2006, to protect the entirety of the site for future generations. It seems premature to consider a Coastal Development Permit before the State Supreme Court has weighed in on the case of the inappropriate nature of this proposal.

Nevertheless, this proposal, despite being recently amended and downsized, continues to violate the thresholds of significance in the areas of land use, aesthetic/visual quality, transportation/traffic, air quality, greenhouse gas creation, and noise impacts, as stated in the environmental documents completed in 2011 by the City of Newport Beach.

From a planning and design perspective, the project as currently proposed should be rejected for a Coastal Development Proposal on the basis of the following issues:

- The most recent plan ignores existing topography and proposes 2.8 million cubic yards of soil would be excavated and stockpiled to prepare the land for development, destroying a unique coastal environment. NBR's plan to dig up over a football stadium full of oil-contaminated dirt from the project site means that toxic, oily runoff from this excavation during big or frequent storms will also be diverted to the ESHA wetlands, Santa Ana River, and the receiving waters of the Pacific Ocean.
- Although some urban runoff currently flows to Banning Ranch's wetlands, NBR's proposal will increase impervious surfaces significantly and hence, increase polluted water draining into the Santa Ana River and Pacific Ocean. While provision of rain barrels and impervious area runoff dispersion connected to harvest and reuse cisterns in developed areas are good mitigation measures for impacts, these engineered solutions versus more holistic solutions, make the area less resilient and open the possibility to polluting the wetland area, the river, and the ocean. During significant or frequent precipitation events, NBR's major water quality Best Management Practice (BMP) is a proposed multi-acre Diffuser Basin in the ESHA wetlands habitat area. It would use this rare habitat area as an effective flood control detention basin, without proper removal of pollution. Hence, failure to use infiltration basins in the upland area would pose large water quality risks for the ESHA wetlands, Santa Ana River, and nearby beaches.
- Low Impact Development suggested by NBR's engineers addresses storm water runoff, yet their latest proposal ignores the economic potential to reduce energy consumption and produce energy on site by orienting streets and buildings to the sun.
- Community design that depends on importing energy from offsite sources via the energy grid increases greenhouse gas emissions, increases the development's carbon footprint, and needlessly increases costs for energy. Just by orienting communities to the sun reduces energy consumption by 30 to 40% without increasing construction cost. With even more innovation and creative design, energy savings can go well above 50%. Now is the time that California must demonstrate to the world how to build climate appropriate resilient communities, and this proposal falls far short.

- Banning Ranch is part of the several thousand-year-old Native American village Genga, an important historic and cultural site for both the local Juaneño (Acjachemen) and the Gabrielino (Tongva) Nations. The “Banning Ranch Cultural Properties and Landscape” was added to the state Sacred Lands file, maintained by the California Native American Heritage Commission at the request of local tribal leaders, and meets the criteria to be considered a Tribal Cultural Resource under the California Environmental Quality Act as recently amended by AB 52.
- Additionally, eight Native American archeological sites have been documented on the property, with at least three of these eligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). The entire area is also likely eligible for listing on the National Register as a Traditional Cultural Property.
- Although the cultural resources and archaeological sites on Banning Ranch have been adversely impacted as a result of oil operations on site, previous disturbances do not compare to the damage that could result from the proposed project. Massive grading proposed would most certainly result in the unearthing of Tongva and Acjachemen cultural items of great significance to both tribal communities. Additionally, creating a massive new housing development would impact the integrity of the site as a traditional cultural property and would impair the ability of contemporary tribal citizens to utilize the area for traditional cultural practices today.
- Considering that over 90% of known Native American traditional cultural properties and archaeological sites in Orange County have been destroyed because of this type of development, the Acjachemen and Tongva evidence on Banning Ranch must be left in place.
- The Coastal Commission must be cognizant of the California Supreme Court’s decision on November 30th on the Newhall Ranch mega development north of Los Angeles. The decision requires public officials to determine whether new development projects will interfere with the state's climate goals stated in A.B. 32. The decision also protected endangered fish and other wildlife by disallowing capture and relocation as mitigation for impacts to endangered species. The court further required more consideration to the issues regarding cultural resources and native peoples.
- For a project that creates substantial levels of greenhouse gases, has significant and unavoidable impacts to federally listed threatened and endangered wildlife, and destroys a Native American Traditional Cultural Property, the Newhall Ranch example carries a salient lesson in pushing forward a project at Banning Ranch that so burdens our state’s resources.

On the basis of the above series of comments, Wild Heritage Planners and our consultants urge the California Coastal Commission to deny this CDP for the Newport Banning Ranch proposal.

BANNING RANCH ALTERNATIVES: BENEFITS OF REGENERATIVE DESIGN

Banning Ranch presents an opportunity to demonstrate that human development can work with nature to enhance and restore sensitive native habitat if designed with a deep understanding of the site's energy and water cycles.

Humans are at a turning point in our history and if we continue to develop cities without taking into account the larger natural systems of which we are a part, we will put future generations at risk of more extreme weather events and failures in our energy, water, and food delivery networks. Humanity is at a point where using fewer resources is not enough to reverse the lack of balance between human development and nature's closed loop energy cycle.

By the 1970s many scientists began describing the potential impact of human development on earth's atmosphere and the risk of continuing to consume resources without concern for the balance between consuming and restoring resources. At that time, a few design professionals began to listen to the warnings of scientists and responded with well-reasoned practical solutions to building human communities in partnership with nature. Regenerative Design, a process-oriented systems theory championed by John Lyle at Cal Poly Pomona, is a comprehensive approach to that goes beyond sustainable design that provides insights on how to build resilient communities that will allow other species to thrive in the near future and enable the cities we build today to thrive in the predicted uncertain climate future.

The Banning Ranch is an opportunity to not only preserve a portion of coastal California landscape but to demonstrate how to build cities that work in partnership with nature to allow humans and other species to thrive.

Regenerative Design:

- Restore native habitat to support the continuing use by future generations
- Build communities that enhance the local closed energy cycle
- Build communities that generate energy consumed on site – orienting development to absorb energy directly from the sun with passive designed buildings is one simple cost effective first step to building cities in partnership with sites closed energy loop.

Regenerative design provides for all human systems to function as a closed ecological/economic system. Ecosystems and regenerative designed systems are holistic frameworks for restoring balance between humans and other plant and animal species and best practices for building resilient communities. The act of destroying massive amounts of ESHA by grading and re-creating the site topography, as proposed by NBR, is the opposite of regenerative design. We suggest a foundational rethink, beginning with development pattern illustrated below.

DESIGN ALTERNATIVES FOR BANNING RANCH

Wild Heritage Planners examined an alternative development pattern generated from the Coastal Commission Staff Environmentally Sensitive Habitat Area (ESHA) maps that stipulated seven possible areas for development.



We focused primarily on three of those areas because several sites were either engaged in active oil and gas uses or would present significant and unavoidable impacts to mapped areas of ESHA. Near the terminus of 17th Street, two sites identified as A and B, and near the terminus of 15th

Street is the area identified as D. All three areas total 6.5 acres of developable area, protecting ESHA and most of the buffer areas recommended, except where it could be reduced slightly.

We have recommended a medium-density residential development type for all three areas. We are looking at a prototype that is generally 16 to 18 dwelling units per acre. This would produce three- to four-story buildings with parking one-half-story underground. By going with a higher density prototype, we can maximize number of units, hence revenue margins for the developer, while opening up further areas around the buildings for ecosystem regeneration and open space for residents.

This might be counterintuitive, lower density is often associated with lower environmental impact. But from a habitat standpoint, medium density scenarios allow for protection of a maximum acreage of native habitat and opens up possibilities to restore more native habitat on the development site.

See the breakdown to date. See below for drawings, including higher-density illustrated concepts for Areas A, B, and D.

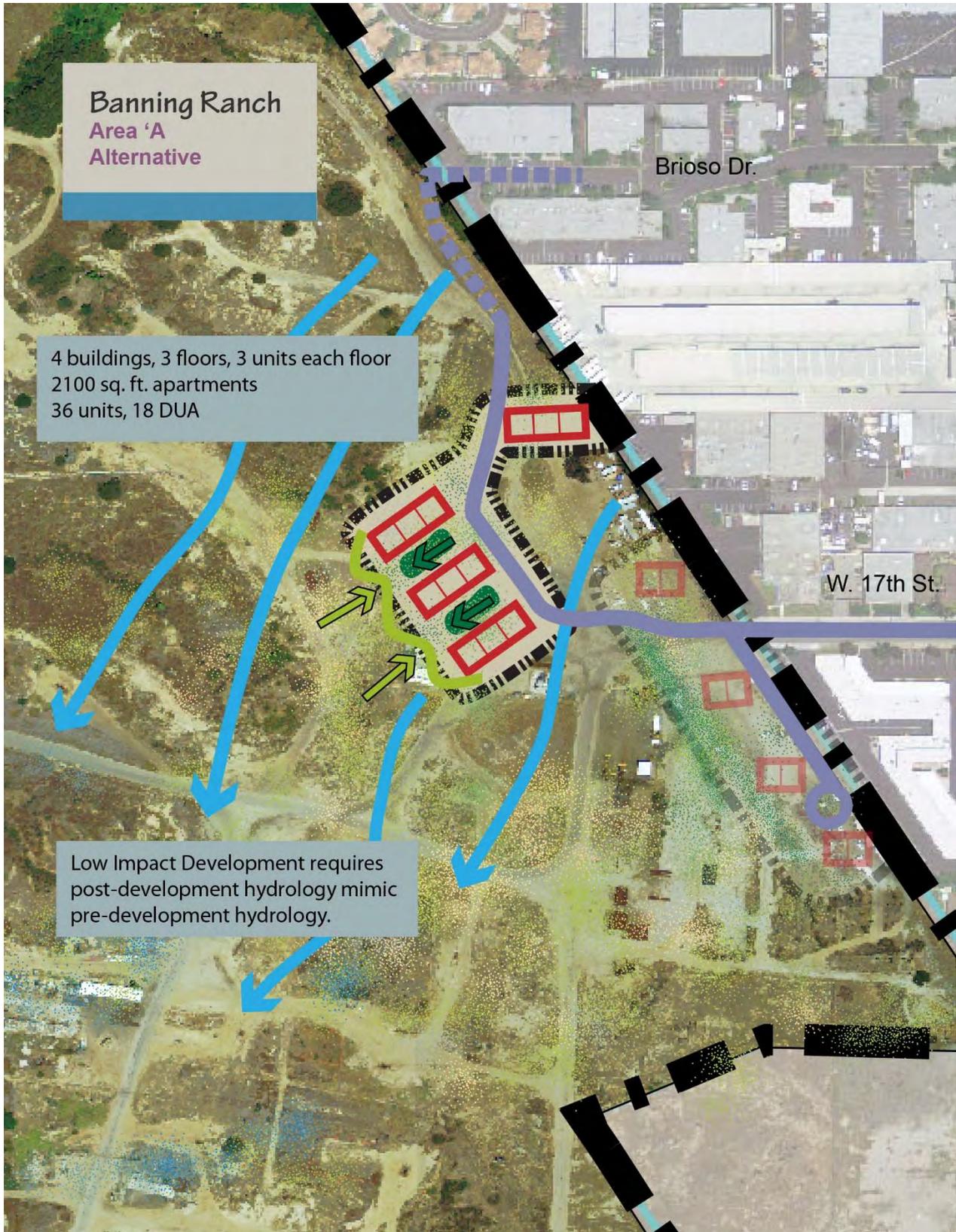
Development Area	Acreage	Density	Unit Square footage	Total Number of Units
A	2	18 DU/AC	2,100	36
B	1.5	16 DU/AC	1,900	24
D	3	16 DU/AC	2,500	48
			TOTAL MEDIUM DENSITY	108

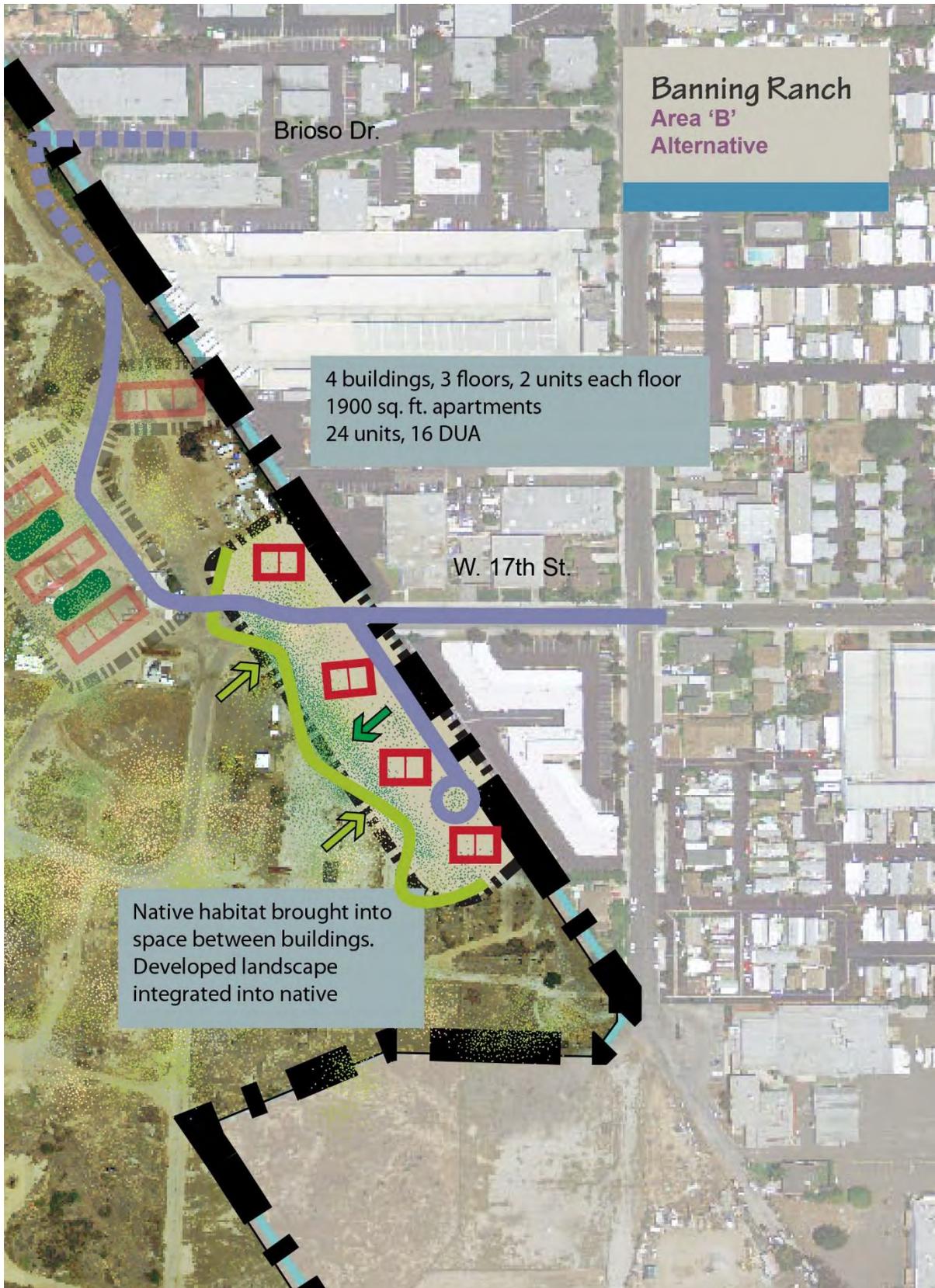
Communal underground parking increases the cost of units somewhat, and requires a certain amount of critical density, but it dispenses with driveways, garages and excess pavement associated with lower density developments. We found the reduced density option would require 42 percent more paving from added streets required to access smaller homes.

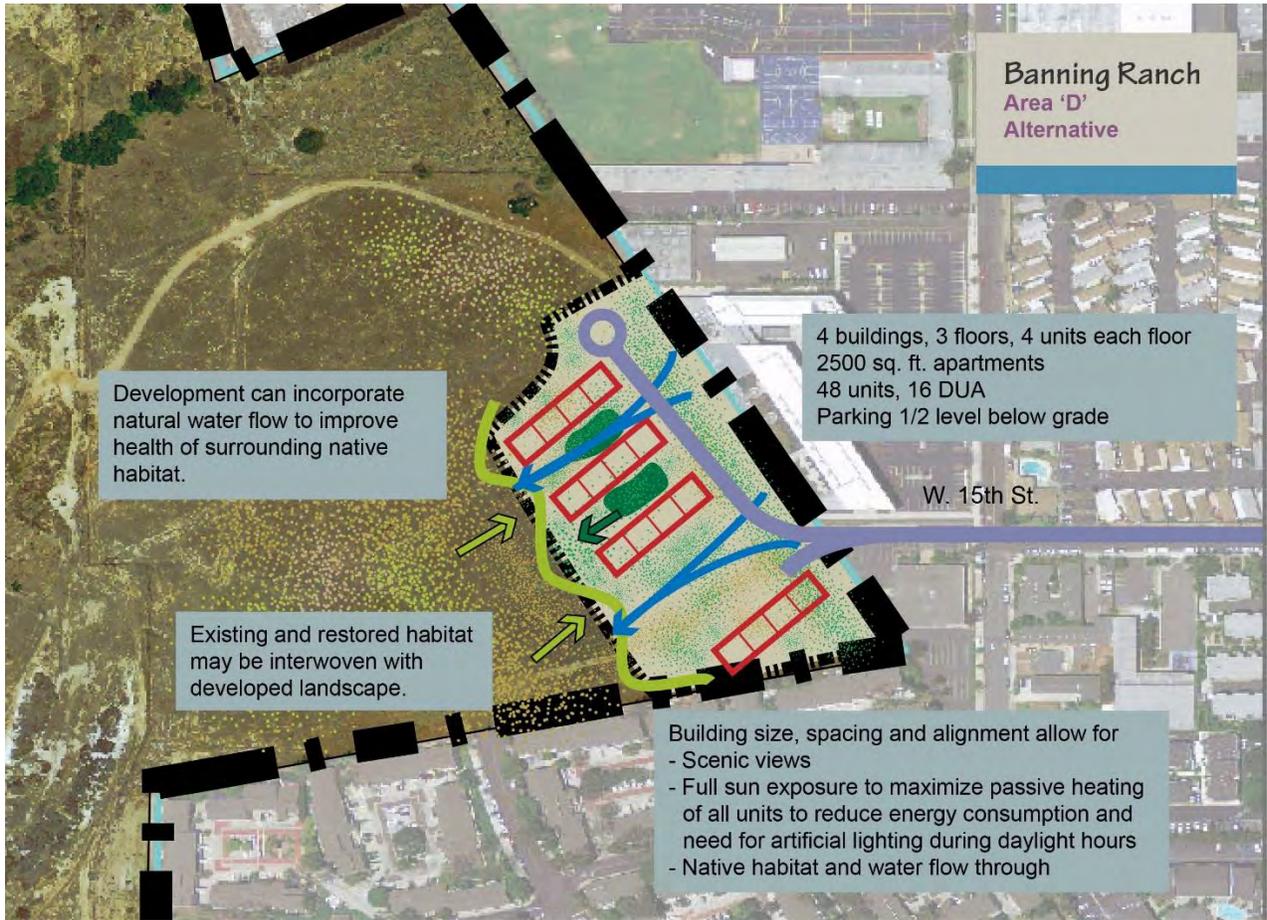
This pattern would support the larger vision of protecting native habitat, create connecting open space, and perhaps even restoring (regenerating) habitat in certain areas. Low-impact design requirements to integrate drainage swales can also be incorporated into this scenario to clean runoff before it flows into sensitive vernal pools. At this density, each of the units can maximize their passive solar orientation as well.

The following maps illustrate the lowest-impact development scenario, separated into areas A, B, and D in the context of the entire site.





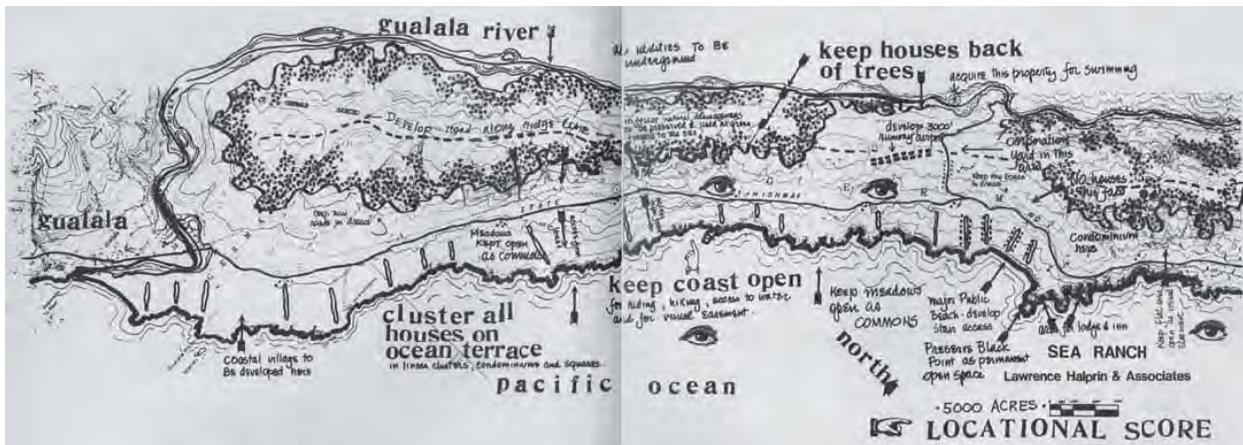




ALTERNATIVE DEVELOPMENT MODELS: The Sea Ranch in Sonoma County, Utopia by the Sea, 1960s to Present

Many correlations were made between Banning Ranch and the Sea Ranch proposal in the 1960s. Set on a mystical 10-mile stretch of California coast, Sea Ranch assimilates with the elements rather than confronting them, based on a plan that codified a covenant with nature. Sea Ranch is a community drawn together by a unique shared vision and respect for its concept, an early example of ecological planning that should not be lost on planners for Banning Ranch. The founding ideal, shaped by the all-star cast of architects, was that the land should be shared rather than subdivided, a dynamic form of conservation or "living lightly on the land."

Landscape Architect Lawrence Halprin designed the master plan based on his experiences on a kibbutz, of open land held in common and houses designed in deference to nature. The battles over land and sea access, part of what spawned the California Coastal Commission, ensured that 10 miles of rugged bluffs and sandy beaches were something to be accessed publicly, rather than privatized for the wealthy and privileged.



Architect Charles Moore called Sea Ranch his "Mother Earth." The designer of Condominium One, a complex inspired by weathered timber-framed barns, now is listed on the National Register of Historic Places, and remains one of the most influential buildings of the 1960s.



The early architecture was communal and modest, with houses clustered perpendicular to the ocean so that everyone would have a view, leaving the meadows open and held in common. Houses were sited to settle into the landscape, like quail nesting.

Obie Bowman designed the Walk-in Cabins, a remote gathering of 15 Hobbit-like dwellings in a kingdom of redwoods in the hills above Highway 1, where no cars are allowed. They are left about a quarter-mile down a dirt road.

Arguably, Sea Ranch's most hallowed ground are the Hedgerow Houses, a group of genteel rustic shacks, some as small as 1,000 square feet, that designer Joseph Esherick tucked inconspicuously into a row of wind-blown cypress trees not far from Black Point Beach.

Unfortunately, many of these concepts have been lost in subsequent planning and sacrifices to the real estate and political interests. By the late 1990s, the area has become suburbanized, but still retains the general outline of the original plan.

ALTERNATIVE DEVELOPMENT MODELS: Village Homes, Davis California, 1960s to 1980s

Village Homes is a planned community in Davis, California, Yolo County, designed to be ecologically sustainable by harnessing the energies and natural resources that exist in the landscape, especially storm water and solar energy.



Photo Above: Grass lined swale collects rainwater, which then slowly percolates into the soil where it is protected from runoff and evaporation.

Village Homes demonstrates simple principles of how to build in partnership with nature. The basic principles of regenerative design are demonstrated here are well tested by time, yet these profoundly simple principles are rarely incorporated as thoroughly as they were in Davis nearly a half a century ago. These ideas are well documented and proven to reduce the local demand for imported energy, the only thing new is the predicted impact of climate change is apparent all over the world and yet we only nibble at that edges of real solutions.



California now has at least four times the number of dwelling units that existed in 1960, yet the number of developments similar to Village Homes that offer real solutions for restoring balance with nature and examples of regenerative resilient communities are too few – less than a dozen.

The principal designer of Village Homes was architect Mike Corbett who began planning in the 1960s, with construction continuing from south to north from the 1970s through the 1980s. Village Homes was completed in 1982, and has attracted international attention from its inception as an early model of an environmentally friendly housing development, including a visit from then-French President François Mitterrand.

The 225 homes and 20 apartment units that now constitute the Village Homes community utilize solar panels for heating, and are oriented around common areas at the rear of the buildings, rather

than around the street at the front. All streets are oriented east-west, with all lots positioned north-south. This feature has become standard practice in Davis and elsewhere, since it enables homes with passive solar designs to make full use of the sun's energy throughout the year. The development also uses natural drainage, called bioswales, to collect water to irrigate the common areas and support the cultivation of edible foods, such as nut and fruit trees and vegetables for consumption by residents, without incurring the cost of using treated municipal water.

More Examples: Passive Net-Zero Buildings appropriate for the Banning Ranch Development

Climate appropriate design from the California's Energy Commission: "Here's a news flash...the sun rises in the east and sets in the west. Here's another... the sun is higher in the summer sky and lower in the winter sky. So what does that have to do with a passive-design house? This simple lesson of nature literally sets the foundation for a well-designed solar home."

"The optimum position for maximum solar benefits is true south but you can vary the orientation within 20 degrees of that direction with minimal effect. In most parts of the U.S., however, just making the building the right shape, properly placing its windows and pointing it in the right direction can cut the building's total energy use by 30 percent- 40 percent at no extra cost."

Our alternative proposal for the Banning Ranch property orients the buildings to optimize passive heat gain for passive winter heating and minimize heat gain during summer months. There are very few examples of passive designed multi-story multi-family residential buildings; California has been an international leader on energy conservation and protecting the environment. A high profile project like the Banning Ranch Development is an opportunity to demonstrate to the world how to build energy efficient resilient communities.

Energy efficient green buildings are good for business

Owners of green buildings reported that their ROI improved by 19.2% on average for existing building green projects and 9.9% on average for new projects. Examples include:

- One major hotel project spent an estimated \$184,000 for building energy efficiency improvements and has realized a yearly savings of \$58,035, yielding a 3.17-year break-even point.
- A new CoStar report indicated that while traditional (non-LEED or non-ENERGY STAR certified) Los Angeles buildings command an average of \$2.16/ft², tenants were willing to pay \$2.69/ft² for ENERGY STAR certified buildings and \$2.91/ft² for LEED certified

spaces. The increased cost of rent appeared to have little effect on vacancy rates, which remained relatively constant with the general market over the 5-year evaluation period.

Alternative scheme for Banning Ranch: LEED Certified buildings generally consume less energy than non-LEED Certified buildings, but not always. Orienting buildings to optimize passive heating and cooling will increase the benefits of energy efficient technologies incorporated into LEED and Energy Star buildings. By combining passive design strategy of orienting buildings south and LEED Energy Standards Banning Ranch will establish a new standard in energy efficient resilient communities for California and the world.



Photo Above: First multi-unit residential building certified to Passive House Plus-- Housing complex in Innsbruck, Austria, combines energy efficiency and renewable energy.

California is considering requiring all residential buildings achieve Net-Zero Energy by 2020. Orienting buildings to the sun is the most cost effective strategy to achieve Net-Zero Energy standards.

BANNING RANCH ALTERNATIVES: ECO-DEVELOPMENTS

The geometry of the proposed NBR resort, imposed through grading and habitat destruction on to the landscape will create the most generic of guest experiences. The design appears like a resort or hotel that could be in “anywhere USA.” By designing to the unique and diverse local topography and vegetation in a holistic way, a one-of-a-kind guest experience could be achieved that could be tailored to all income levels of coastal, visitor-serving accommodation. The Southern California coast is a special place, and this being one of the last significant parcels left, effort should be taken to create within the context of the site to preserve ESHA and wildlife areas. Resorts and communities that have a unique quality often have greater economic returns.

Furthermore, the NBR plan has roads and parking areas that will further destroy the integrity of the wild landscape. NBR should consider a medium-density Eco-Resort prototype where parking would be offsite at the eastern edge of the property, with shuttles that would bring people into the resort. Within that scenario, low-impact, low-cost visitor-serving accommodations could also be provided on-site.

The following eco-developments could be used as models for a sustainable re-design of NBR’s environmentally heedless and generically-designed plan.



Southern Ocean Lodge in Australia is an example of human development designed to respect sensitive native coastal landscape habitat. This luxury hotel demonstrates that Eco Design can be upscale.

The Southern Ocean Lodge is a resort, but this sensitive approach to building in harmony with native landscape is adaptable for larger multi-family residential developments.



The Fogo Island Inn, on Fogo Island, Newfoundland, Canada is another example of design that is mindful of sensitive coastal landscape.





Fogo Island Inn see: <http://www.fogoislandinn.ca/fii/>

Other development options for low impact resorts provide examples that low impact “Eco Resorts” can provide anywhere from luxurious amenities to basic backcountry rustic, while preserving sensitive native habitat.



SUSTAINABLE SITES DESIGN CRITERIA

Development in such a sensitive ecosystem requires the utmost attention toward preservation of natural resources that we do not see employed by Newport Banning Ranch. There is mention of using the LEED (Leadership in Energy and Environmental Design) criteria for green building. What this lacks are standards for landscape development that would include areas with or

without buildings, including those created by the Sustainable Sites Initiative (SITES, <http://www.sustainablesites.org/>)¹.

One example is the Seagrove project in New Zealand (pictured below).



¹ Most of this text is extracted or paraphrased from “the Sustainable Sites Handbook” by Meg Calkins, John Wiley & Sons, Inc., Hoboken NJ, 2012

SITES defines sustainable design as “design, construction, operations and maintenance practices that meet the needs of the present without compromising the ability of future generations to meet their own needs.” Sustainable site design emphasizes design of whole, complex functioning systems; a widened scale of analysis and design consideration; highly site-specific (as opposed to universal) design responses; and continued monitoring, management, and adaption to ensure healthy, functioning systems for the life of the landscape.

SITES focuses on the benefits humans obtain from ecosystems, otherwise known as ecosystem services. The term ecosystem services describes how the living elements of ecosystems, such as vegetation and soil organism, interact with the nonliving elements, such as water, air and bedrock, in ecosystem processes to produce goods and services that offer direct or indirect benefits to humans. Such processes include water purification, urban heat island reduction, pollination, waste decomposition, erosion control, air cleaning, biodiversity and recreation.





Sites can be developed sustainably when ecosystem services are protected, enhanced or created. For example, structures can be built with green roofs to replace native flora, manage water flows and decrease heat island effect. Natural hydrologic features (e.g. vernal pools and connecting swales) can be incorporated into the developed landscape instead of being overrun. The developed landscape can be an organic extension of the surrounding native landscape rather than an imposed, unnatural and thoughtless design.

Within the scoring system for SITES conserving habitats for threatened and endangered species is a prerequisite before any points are assigned. Points in the Soils and Vegetation section are given for such items as conserving special status vegetation; conserving and restoring native plant communities; and conserving healthy soils. SITES designates levels of accomplishments for developments depending on how many points the project earns.

Another development approach less defined than SITES is conservation development.

Conservation development is a controlled-growth land use development that adopts the principle for allowing limited sustainable development while protecting the area's natural environmental features in perpetuity, including preserving open space landscape and vista, protecting farmland or natural habitats for wildlife, and maintaining the character of rural communities.² The

² Arendt, Randall G. (1996). *Conservation Design for Subdivisions: A Practical Guide to Creating Open Space Networks*. Washington: Island Press. [ISBN 978-1-55963-489-2](https://www.islandpress.com/books/9781559634892).

management and ownership of the land are often formed by the partnership between private land owners, land-use conservation organizations and local government. It is a growing trend in many parts of the country, particularly in the western United States.³

Conclusion

For the reasons stated above, approval of the Coastal Development Permit for the latest development plan by NBR should be denied. The plan violates the California Coastal Act and the California Environmental Quality Act, and the merits of the plan do not give sufficient basis for overriding considerations where the project benefits would override the stated and documented impacts to the environment.

Instead of planning and designing to celebrate the environmental uniqueness of this site, the developer claims it has minimal wildlife, negligible ESHA, and can easily mitigate issues on- or off-site.

We hope to collaborate with the applicant on a design that would employ the concept of a “dynamic conservation,” as witnessed at Sea Ranch, using the patterns and principles of design that are Regenerative, Sustainable and Climate-Appropriate. Until this work is carried out, No Project is the only way forward.

³ https://en.wikipedia.org/wiki/Conservation_development

From: [Jack Eidt](#)
To: BanningRanchComments@Coastal
Subject: Analysis of Newport Banning Ranch Coastal Development Permit - Wild Heritage Planners
Date: Monday, May 02, 2016 4:31:25 PM
Attachments: [Banning Ranch Alternative Plan Analysis - WHP - 5.2.16.pdf](#)

Dear Coastal Commission:

We appreciate the opportunity to comment on the Newport Banning Ranch Coastal Development Permit now under consideration by the Coastal Commission. Please accept the attached report into the public record, prepared for the Banning Ranch Conservancy by Wild Heritage Planners, Carl Welty Architects, and Blake Whittington Landscape Planner.

If there is any problem accessing this document, do not hesitate to contact me.

Sincerely,

Jack Eidt
Director - Wild Heritage Planners
Publisher - WilderUtopia.com - Coexisting into the Great Unknown
Connect on [Facebook](#) and [Twitter](#) - [@WilderUtopia](#)
Office 323 362 6737

RECEIVED
South Coast Region

MAY 16 2016

CALIFORNIA
COASTAL COMMISSION

May 12, 2016

California Coastal Commission
200 OceanGate
10th Floor
Long Beach CA 90802

Dear Board Members

A brief note to simply state it behooves the commission to protect Banning Ranch in its entirety. We have nearly no wetland or open coastal space left. This area needs to be protected for eternity. To allow the continual onslaught of "developers" to hasten the destruction of nature is horribly wrong. Do your job as it should be done.

Respectfully



Steve Tyler
2564 Franki
Orange CA 92865

From: [KnowWho_Services](#)
To: BanningRanchComments@Coastal
Subject: Reject Application 5-15-2097 to Develop Banning Ranch
Date: Thursday, May 12, 2016 6:22:08 PM

Dear CA Coastal Commission,

Dear Commissioners:

Do the RIGHT thing!! What will your legacy be? A housing development? Seriously...I write to urge you to reject Application 5-15-2097 to develop Banning Ranch. Don't be a sell-out. As Coastal Commissioners, your job is to protect the coast of California, not exploit it!

I urge you to follow the letter and spirit of the California Coastal Act and reject the proposal to develop Banning Ranch.

Sincerely,

Donna Birge
4681 Goldfield
Long Beach, CA 90807-
birgebergeron@verizon.net
(562) 221-7957

From: bcd.craig@yahoo.com
To: BanningRanchComments@Coastal
Subject: Banning Ranch - Citizen's Opposition to Plan
Date: Thursday, May 12, 2016 6:22:43 AM

Dear Coastal Commission Director and Staff,

Please lodge this comment as opposition to the planned Banning Ranch development. I am 48 years old have lived in Huntington Beach since 1973. In those years, I have seen Orange County's natural beauty paved over at every turn. I have seen the ocean poisoned and the coastal wetlands bulldozed. What little undeveloped, open space we have left must be preserved. There is no pressing need for more shops and hotels along PCH. Newport Beach has plenty of shopping centers already. The housing we need is affordable housing. The proposed development will be anything but affordable housing. The best decision you can make is to deny the Banning Ranch Development proposal and save our coastline for future generations to enjoy. There is always more time to build but there is never another chance to protect our coast and our state. Once it is built up, it is gone for ever. Please don't let that happen to one of the few remaining corners of wild space in the heart of Orange County. We the people need continued access to natural beauty which enriches our minds and soothes our souls. Thank you.

From: [David Weinstein](#)
To: BanningRanchComments@Coastal
Subject: banning each proposal
Date: Thursday, May 12, 2016 2:46:41 AM

Dear Commissioners,

I strongly urge you to reject the Banning Ranch development proposal.
Thank you.

David Z. Weinstein

W. Hollywood, CA

From: [Geri von Freymann](#)
To: [BanningRanchComments@Coastal](#)
Subject: Saving an ecologic treasure
Date: Wednesday, May 11, 2016 6:13:54 PM

Every inch of wetlands, vernal pools and native flora and fauna must be saved. Otherwise the future will be cinder walls, over-development and pollution. California is shrinking. As the Lorax said, Who speaks for the trees? You do!!!

The CCC has been entrusted with our precious coastline, please protect and save it.

Geri von Freymann
Huntington Beach

From: [Ivars Ozolins](#)
To: BanningRanchComments@Coastal
Subject: Stop the Development of Banning Ranch
Date: Sunday, May 01, 2016 3:47:27 PM

Hello and Good Afternoon,

As a concerned citizen and taxpayer, and as someone who spends plenty of time in Orange County, I am writing to you to urge you to reject any development of Newport Banning Ranch in Orange County. Doing so will ensure the continued safe haven for a large variety of bird and other animal species, as well as the habitats these beings need to survive in our otherwise largely developed coastal lands.

Do we really need more homes, shopping centers and hotels in this area? No! Given the immediate proximity to the ocean, it's clear this development will adversely impact the coastline, increase traffic in the area which will further denigrate the coastline and is thus not needed in this area. Additionally, this area has been designated as a Priority Conservation Area by the Orange County Transportation Authority Measure M2 Mitigation Program.

Please help us avoid the tragedy this project would undeniably bring to these animals, this rare habitat and us humans, too! Reject any proposal to develop this crucial piece of habitat, both now and in the future.

Thank you for your leadership and stewardship of our world-class coastlines and habitats.

Best regards,

Ivars Ozolins
Encinitas, CA 92024

From: [CAROL MASON](#)
To: BanningRanchComments@Coastal
Subject: Leave our coast alone.
Date: Sunday, May 01, 2016 10:32:21 AM

To the Commission...

I want to strongly state my opposition to the Banning Ranch development project. After watching the Commission act honorably through the years to save the coastline for the residents of the state of California, I am deeply disturbed by the recent turnaround in the way the commission operates. Now, after admiring your work for years, I am see that the commission, like almost every other political institution, has bowed deeply to the god of money — in this case to the developers of the Banning Ranch property who wish to build yet another hotel, yet another useless strip mall and almost a thousand homes.

Flying over this particular area of the southern California coastline, you will be aware that there is a very high degree of development. Now in the 21st century, I think there is some realization that this endless development can no longer be countenanced in a world with finite resources. But this is the time that the Commission has chosen to take a very pro-business and pro-development turn. I find this incredibly puzzling. The Commission has chosen to take staff decisions which make the outcome of this vote almost pre-determined, while ignoring the voices of the public who will have to put up with the traffic and the yet another schlocky coastal project assaulting the eyes.

I think at this point that the Commission is on the verge of losing respect and fear (a useful emotion in some places) built up over the years. This will change the nature of the coast forever. Instead of taking a principled viewpoint, you are now beholden to the gods of money and celebrity (photos of a commissioner with a prominent U2 band member are disgusting and inappropriate...and say so much about where the Commission finds itself these days). I don't frankly know how you will proceed as you are losing the confidence of the residents of the state of California. I have never felt the need to comment on these matters, but I am sure I represent many other people who find your current actions disturbing. I hope you will reconsider and choose to once again fulfill your original mission to save the coast for the residents of the state rather than bowing down to the developers who will never stop finding ways to despoil our coast.

Sincerely,

Carol Mason
Newport Beach, CA

From: hikersierras@yahoo.com
To: BanningRanchComments@Coastal
Subject: Coastal Commission May 12,2016 vote on Banning Ranch development
Date: Sunday, May 01, 2016 3:30:49 PM

Dear California Coastal Commission,
The Banning Ranch property should not be developed. Its ecological system should be enhanced.

Gary Hartung, Simi Valley, Ca. ,

COSTA MESA



May 1, 2016

California Coastal Commission
45 Fremont Street, Suite 200
San Francisco, CA 94105

Re: Newport Banning Ranch (Application 5-15-2097)

Ladies and Gentlemen:

Costa Mesa First requests that the California Coastal Commission reject Application 5-15-2097 with respect to Banning Ranch.

The residents of Costa Mesa will suffer most of the impacts of this project. Development of the property will require funneling auto and truck traffic through Costa Mesa, which already suffers congestion on its roads, especially in the summer months. The increased air pollution that accompanies new traffic will only be compounded by the contaminated soil that prevailing winds will blow into nearby neighborhoods during the 10 years of construction. There will be no mitigation of these impacts.

This project will have a tremendous adverse impacts on Banning Ranch's biological resources and natural landforms. The visual impacts of the project have made it inconsistent with the California Coastal Act. The Commission staff report has previously describe the land as the home of "an incredibly unique array of coastal species and habitats." While some of the land has been used as the sites for oil drilling, that land has been largely off limits to much human traffic, which has allowed wildlife to take refuge there. Further, the staff report also stated "There are very few sites along the southern California coastline with the kind of diverse topography and habitat for wildlife found at this site".

The California Coastal Act rightfully requires that environmentally sensitive habitat areas be protected. Costa Mesa First asks that you to follow the letter and spirit of the California Coastal Act, recognize the adverse impacts on the surrounding community, and reject the proposal to develop Banning Ranch.

Very truly yours,



Richard J. Huffman, II
Treasurer

Costa Mesa First (FPPC 1332564), P.O. Box 2282, Costa Mesa, CA 92628
costamesa1st@gmail.com
costamesa1st.com
(714) 549-5884

From: [Dorothy](#)
To: BanningRanchComments@Coastal
Subject: Banning Ranch
Date: Sunday, May 01, 2016 2:52:59 PM

Southern California does NOT NEED any more development at this point in time. We have DROUGHT and enough CONGESTION for decades. We need to solve our water and transportation problems before adding fuel to the fire. Therefore we strongly oppose this project.

It was quite obvious to those of us interested in preserving open space in this state that it was developer friendly decisions like the one being considered that led to the dismissal of Dr. Charles Lester.

Dorothy Golz
Helmut Golz
7147 E. Killdee Street
Long Beach, CA 90808

Sent from my iPad

From: [Roger -](#)
To: BanningRanchComments@Coastal
Subject: Stop Banning Ranch Development
Date: Saturday, April 30, 2016 7:57:12 AM

Stop all Banning Ranch development. There is so little open space in that area of Newport and Huntington Beach. The space at Banning Ranch is precious, and when its gone, its gone. We have enough stores and expensive housing. Adding more is of no benefit.

Something is rotten with the Commission. This is not how one should be protecting our coast.

Roger Hinkson
Irvine, CA

From: [William Dunlap](#)
To: BanningRanchComments@Coastal
Subject: No Development at Banning Ranch
Date: Saturday, April 30, 2016 1:44:36 PM

Dear Coastal Commission:

Both my wife and I are against any form of development on the Banning Ranch land.

Aside from the ecological damage, the traffic impact that development would cause to both Newport Beach and Costa Mesa is totally unacceptable. Due to this alone the project should be stopped.

Sincerely,

William Dunlap
Costa Mesa, CA

Willie

From: [John McMahon](#)
To: BanningRanchComments@Coastal
Subject: Fwd: Stop!!!!
Date: Saturday, April 30, 2016 1:47:14 PM

>>

>> Do your job. 900 houses, a hotel and retail development does not remotely comport with your stated purpose. How much money are they paying you to ruin Newport and the last coastal open space in OC? Shame on you and your corruption.

>>

>> Sent from my iPhone



Dear Commissioners,

This letter is in reference to the CDP 5-15-2097, the Newport Banning Ranch LLC development in Newport Beach. The Board of Directors of Newport Crest Homeowners Association, a 460-unit condominium complex, is very concerned with a possible change to the design of the development.

Newport Crest is adjacent to Newport Banning Ranch LLC, we share a perimeter. For several years, the Board of Directors has been involved in direct conversations with the developers and we have a good working relationship. We have discussed the design, changes in design, and they have responded to some of our concerns by implementing changes we requested. For example, the extension of 15th Street to Bluff Road came within 20' of our property. After meeting and discussing our concern, a subsequent design moved the road about 80' away. Also, the developers have agreed to build a pedestrian gate from our property to Banning Ranch, at the end of our main road.

Over the years, the discussion about the design of the Banning Ranch property has never included building homes directly adjacent to Newport Crest property. Based on comments made at the October 2015 Coastal Commission meeting in Long Beach, it was suggested by a Commissioner to look at building adjacent to Newport Crest. We are very concerned about this suggestion. The homes along this perimeter of Newport Crest have the good fortune of a view of Banning Ranch as well as the ocean.

Many homeowners were involved in the EIR process at the City of Newport Beach, providing input regarding concerns, criticism, and suggestions. If the design of the development had included the construction of homes directly adjacent to our homes, Newport Crest would have provided MUCH more input at the EIR level, as well as the Coastal Commission meeting in October, 2015. The content and scope of the EIR would have been very different than the one that was approved. Not having any opportunity for input on this particular design, the people in our community are at a great disadvantage, a decision could be made by the Coastal Commission without hearing from the people directly affected by this decision.

Prior to making a decision, we request you visit Newport Crest homes to observe firsthand the impact of this decision. At this time, we do not have another venue to express our concerns. We know the Commission does not address effects of land development on people. However, the people of Newport Crest have not been provided ANY opportunity for input on this matter. Prior to the March 2016 Coastal Commission meeting in Santa Monica, we request you examine this proposal carefully.

HOMEOWNERS ASSOCIATION

210 Intrepid Street • Newport Beach, CA 92663 • 949.631.0925 • Fax 949.631.5433

LETTERS OF CONCERN AND OPPOSITION

APPENDIX E2, PAGE 252



Changing the footprint of the Newport Banning Ranch LLC development to make it smaller in one area and moving it to this location is not what the developer or Newport Crest want. We want all development, including homes and parking, to be moved to the other side of the proposed extension of 15th Street, where there is a large area of buildable land where the active park is proposed.

Thank you for considering our request. Please contact us for more information or if you have any questions.

Sincerely,

Mark Gonzalez, President
Ginny Lombardi, Vice President
Sharon Boles, Secretary
Don Bruner, Treasurer
June Palomino, Member at Large
Xochitl Yocham, Community Manager

HOMEOWNERS ASSOCIATION

210 Intrepid Street • Newport Beach, CA 92663 • 949.631.0925 • Fax 949.631.5433

LETTERS OF CONCERN AND OPPOSITION

APPENDIX E2, PAGE 253



September 11, 2015

Via Email and U.S. Mail

Chairman Steve Kinsey and Honorable Commissioners
c/o Mr. Karl Schwing, Orange County Area Supervisor
California Coastal Commission
220 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Ms. Amber Dobson, Coastal Program Analyst
California Coastal Commission
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Re: Newport Banning Ranch Project – Application 5-13-032

Dear Coastal Commissioner Chair Kinsey, Commissioner and Staff,

The Newport Crest Homeowners Association Board of Directors represents 460 condominium owners. Our community is located immediately adjacent to the proposed Banning Ranch development, bordered on the west, southwest and eastern perimeters.

Should the Banning Ranch project be approved, we are very concerned with the impacts on Newport Crest residents such as, but not limited to, air pollution, noise, traffic, lighting, and impacts to our overall quality of life during the 10 year development period which includes demolition, excavation, soil remediation on site, grading, construction and ongoing impacts after the project is completed.

The mitigation or elimination of these impacts through special conditions is required for the Commission to find the project consistent with the California Coastal Act. For example, the close proximity to Newport Crest of the extension of 15th Street is of great concern to us since it runs parallel to our property at a distance of less than 100'. Elimination of 15th Street to Bluff Road from the project would eliminate both the road's possible impacts to ESHA as well as its adverse traffic, congestion and air quality impacts on Newport Crest and other local residents. We urge staff to recommend removal of the proposed 15th Street extension.

H O M E O W N E R S A S S O C I A T I O N

210 Intrepid Street • Newport Beach, CA 92663 • 949.631.0925 • Fax 949.631.5433

LETTERS OF CONCERN AND OPPOSITION

APPENDIX E2, PAGE 254



The Banning Ranch project will also require mass grading resulting in the movement of thousands of cubic yards of sediments. Even if all of this dirt is retained on-site, grading will require the use of large diesel trucks that emit harmful diesel particulate matter, exposing Newport Crest residents to harmful airborne sediments. Considering the long history of oil exploration on the Banning Ranch site, the potential spread of toxic contaminants is a major concern to our resident's health. Minimization of grading at Banning Ranch and the imposition of enforceable conditions regarding the testing of airborne contaminants is required.

Similarly, the project proposes lighted sports fields. Maintaining the sports fields but eliminating the night lights would greatly reduce negative impacts on Newport Crest. Otherwise, special conditions limiting the direction, intensity and hours of use would provide some measure of protection for the quality of life for nearby residents.

We believe the health and well-being of our Newport Crest community will be at risk should this project proceed. Mitigations for our concerns need to be addressed. We are asking the Coastal Commission to take our concerns into consideration when you deliberate the scope and impact of the project on our community.

This emailed copy will be followed by a hard copy with original signatures of the Newport Crest Board of Directors.

We request notice of any changes in the proposed hearing date and location.

Please feel free to contact us if you have any further questions.

Sincerely,

Mark Gonzalez, President

Ginny Lombardi, Vice President

Sharon Boles, Secretary

Mike Rosenthal, Treasurer

June Palomino, Member at Large

H O M E O W N E R S A S S O C I A T I O N

210 Intrepid Street • Newport Beach, CA 92663 • 949.631.0925 • Fax 949.631.5433

LETTERS OF CONCERN AND OPPOSITION

APPENDIX E2, PAGE 255