

**From:** Blair Owens <baowens14@yahoo.com>  
**Sent:** July 02, 2025 3:24 PM  
**To:** Arregui, Jerry; Blom, Noah  
**Subject:** Strong Opposition to Proposed Ford Road Development – Plan PA2025-0056

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

Dear Mr. Arregui and Councilman Blom,

I'm writing to express my strong opposition to the proposed 27-unit condominium development on Ford Road (Plan PA2025-0056), adjacent to Bonita Canyon Sports Park.

As a homeowner in this community since 2016, I am deeply concerned about the negative impact this project would have on traffic, safety, and the overall livability of our neighborhood. Ford Road is already a heavily trafficked corridor—serving as a main access point for Port Streets residents, park-goers, and youth sports activities. Adding a high-density development with units opening directly onto the existing park parking lot would significantly exacerbate congestion and pose real safety concerns for pedestrians and families.

The scale and density of the proposed project are simply out of character with the surrounding residential area. A 47-foot-tall structure and 27 new residences—larger than the previously rejected 2019 proposal—would introduce undue strain on local infrastructure and parking, while diminishing the open feel and community value of the park-adjacent space. The lack of transparency around ingress and egress, particularly the proposed use of the AT&T driveway, only adds to the unease.

I understand that development is likely to occur on this site, but I urge the Planning Commission and City Council to reject this proposal in its current form. A significantly scaled-down and thoughtfully integrated project might be more appropriate—but not at the cost of our quality of life, safety, or property values.

Please prioritize community input and preserve the character of our neighborhood.

Sincerely,

Blair Owens  
1815 Newport Hills Drive E  
Newport Beach, CA 92660

**From:** brookecole99@gmail.com  
**Sent:** July 02, 2025 4:31 PM  
**To:** Arregui, Jerry; Blom, Noah  
**Subject:** Opposition to Ford Road Development— Plan PA2025-0056

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

Dear Mr. Arregui and Councilman Blom,

I'm writing as a concerned resident/homeowner of the Port Streets neighborhood regarding the proposed development on Ford Road (Plan Number: PA2025-0056). I strongly oppose this project in its current form.

This area on Ford Road has parking limitations, is already heavily impacted by traffic (by those using the community parks, athletic fields, and this being a main point of access in and out of the Port Streets). In addition, traffic studies and safety concerns should to be taken into consideration. Adding 27 units—more than the 2019 proposal—and a 47-foot-tall building will only worsen congestion and strain infrastructure. The lack of clarity around ingress/egress and the proposed use of the AT&T driveway adds to my concern. While I understand development may occur at this site, the current scale and density are simply not appropriate for the surrounding neighborhood. I urge you to take community feedback seriously and reconsider or scale back the proposal.

Thank you for your time and for representing our interests.

Sincerely,

Brooke Cole

949 861-0771

**From:** Debbie Mahon <debbiewhitener@hotmail.com>  
**Sent:** July 02, 2025 10:38 AM  
**To:** Arregui, Jerry  
**Subject:** Opposition to Proposed Development on Ford Road (PA2025-0056)

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

Dear Mr. Arregui and Councilman Blom

As a concerned resident and homeowner in the Port Streets neighborhood, I am writing to express my strong opposition to the proposed development on Ford Road (Plan Number: PA2025-0056) in its current form.

The proposed site is already burdened by significant traffic and limited parking, particularly due to its proximity to community parks, athletic fields, and its role as a primary access point into and out of the neighborhood. The addition of 27 residential units—an increase from the 2019 proposal—and a 47-foot-tall structure would exacerbate these issues, putting further strain on local infrastructure and worsening congestion.

Equally troubling is the lack of clarity around the potential use of the AT&T driveway. These uncertainties raise serious safety and traffic management concerns that must be addressed.

While I understand that development may be inevitable, the current scale and density of this proposal are out of step with the character and capacity of the surrounding community. I urge you to take the concerns of local residents seriously and to reconsider or significantly scale back this project to better align with the neighborhood's needs and limitations.

Thank you for your time and attention.

*Thank you,  
Debbie Mahon*

**From:** Patty Wills <westernmarine@sbcglobal.net>  
**Sent:** July 02, 2025 12:01 PM  
**To:** Blom, Noah  
**Cc:** Arregui, Jerry  
**Subject:** OPPOSITION to Ford Road Development - Plan PA2025-0056

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

Dear Mr. Arregui and Councilman Blom,

I'm writing as a concerned resident/homeowner of the Port Streets neighborhood regarding the proposed development on Ford Road (Plan Number: PA2025-0056). I strongly oppose this project in its current form.

This area on Ford Road already has severe parking limitations, and is already heavily impacted by heavy traffic from those using the community parks and athletic fields.

In addition, this is the main point of access in and out of the Port Streets. Furthermore, traffic studies and safety concerns need to be taken into consideration. The idea of adding 27 units is unreasonable. A 47' foot building will only worsen an already highly congested area.

The lack of clarity around ingress/egress and the proposed use of the AT&T driveway adds to my concern. While I understand development may occur at this site, the current scale and density are simply not appropriate for the surrounding neighborhood. I urge you to take community feedback seriously and reconsider or scale back the proposal.

Thank you for your time and for representing our interests.

Sincerely,

Harvey Wills

**From:** John Elmajian <john@bologroup.com>  
**Sent:** July 02, 2025 6:50 PM  
**To:** Arregui, Jerry  
**Subject:** OPPOSITION - Ford Rd condo project

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

I have lived in this neighborhood (Harbor View homes) over 30 years. My wife and I opposed the development of the land between Bonita Canyon and Ford Road (it was condos back then as well) back in the day because we thought it was a bad idea (instead we got excellent baseball fields and soccer fields...a real addition to the community). Now, here we are again with a similar proposal for the end of the street...again, a horrible idea. There is no way this makes sense as a “value add” to the community. The increase in traffic and danger to our children is very concerning. I am asking that you would vote against this project. Please know this is incredibly important to me. I appreciate your service and willingness to listen.

All the best!

John C. Elmajian  
**BOLO** Group  
949.251.9221 x1107 w  
949.246.4412 c  
949.263.8796 f

**From:** Lori WENGER <lornicada@aol.com>  
**Sent:** July 02, 2025 5:09 PM  
**To:** Arregui, Jerry  
**Subject:** Opposition to Ford Road Development – Plan PA2025-0056

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

Dear Mr. Arregui and Councilman Blom,

I'm writing as a concerned resident/homeowner of the Port Streets neighborhood regarding the proposed development on Ford Road (Plan Number: PA2025-0056). I strongly oppose this project in its current form.

My family and I have lived in the Port Streets since 1992 and we LOVE our neighborhood! Even without the addition of the proposed development, we have already noticed a definite large uptick in traffic flow and difficulty driving places on our surrounding major streets. We were here before Ford Road became Bonita Canyon, so of course that was a huge change.

Since then multiple developments in NB have led to population surges and many more cars on the roads near us, which has without question made the drives in any direction leaving and returning to our home, more time consuming and irritating, during many hours of the day and evening

The traffic increases have eroded the easy going pace of our lives here. And the politeness of drivers in general, and the safety of our roads. We find ourselves stuck at lights and intersections, for noticeably longer times, before entering San Miguel, or Bonita Canyon for example. I do not even want to imagine how difficult it will be to drive anywhere from our home, if you succeed in building this new development, as currently planned!

This area on Ford Road that you are planning on developing, has parking limitations, is already heavily impacted by traffic (by those using the community parks, athletic fields, and this being a main point of access in and out of the Port Streets). In addition, traffic studies and safety concerns should to be taken into consideration. Adding 27 units—more than the 2019 proposal—and a 47-foot-tall building will only worsen congestion

and strain infrastructure. The lack of clarity around ingress/egress and the proposed use of the AT&T driveway adds to my concern.

While I understand development may occur at this site, the current scale and density are simply not appropriate for the surrounding neighborhood. I urge you to take community feedback seriously and reconsider or scale back the proposal.

Thank you for your time and for representing our interests.

Sincerely,

Lori & Brahm Wenger and family

2327 Port Lerwick Place

NB, 92660

**From:** [Andrew Dinuzzo](#)  
**To:** [Planning Commission](#)  
**Subject:** Ford Road Townhomes - agenda #3  
**Date:** July 02, 2025 11:44:13 AM

---

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe.  
Report phish using the Phish Alert Button above.

Dear Honorable Members of the Newport Beach Planning Commission,

My name is Andrew DiNuzzo, and I live in Newport Beach with my wife, where we're proudly raising our family. I'm writing to voice my support for the Ford Road Townhomes project, which I believe is a smart, well-rounded addition to our community.

This isn't just a housing development—it's an upgrade to an entire site that has been overlooked for too long. Right now, the property sits vacant and unused. Next to it is an aging AT&T facility that doesn't add much value or visual appeal to the area. This project would revitalize the block, with attractive new homes, landscaping, and improvements to the existing utility property that have been long overdue.

The fact that this is a for-sale project makes it even more important. Young families like mine need more opportunities to live and grow in Newport Beach. These townhomes offer that, and in a way that feels connected to the surrounding neighborhoods. With direct trail access, open space, and thoughtful architecture, it checks all the boxes for both livability and community compatibility.

It's clear the developers have put time and care into getting this right. This isn't overbuilt or out of character. It's the kind of responsible, high-quality project that brings real benefits to both future residents and those of us who already live nearby.

I respectfully urge the Commission to approve Agenda Item No. 3. This is a well-planned, much-needed improvement that will serve Newport Beach well for years to come.

Andrew M. DiNuzzo



**From:** [Michael DiPrima](#)  
**To:** [Planning Commission](#)  
**Subject:** Ford Road Townhomes (PA2025-0049) – Agenda Item No. 3 - SUPPORT  
**Date:** July 02, 2025 7:40:58 PM

---

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe.  
Report phish using the Phish Alert Button above.

Dear Newport Beach Planning Commission,

As a longtime Newport Beach resident, I wanted to share my enthusiastic support for the Ford Road Townhomes project. I've followed the evolution of this property and have reviewed this staff report, and I have to say—it's refreshing to see a project that combines smart design with community benefit.

Frankly, I like the three- and four-story concept. It's modern, efficient, and it helps reduce sprawl while still respecting the surrounding area. Not everything in Newport needs to be one or two stories—especially when we're talking about thoughtfully designed housing that creates ownership opportunities for new families and long-term residents alike.

I'm excited to see this project move forward and help provide the kind of housing our community actually needs. With floor plans ranging from two to four bedrooms, the townhomes appeal to a broad range of people—from young professionals to growing families—many of whom have struggled to find for-sale housing in Newport Beach that isn't decades old or out of reach.

The location is also a smart one. Right next to Bonita Canyon Sports Park, this project will tie into existing trail access, create walkability, and make great use of an otherwise underutilized piece of land. And the commitment to improve the adjacent AT&T facility, with landscaping, repaving, and a visual upgrade to the building, is a big win for the neighborhood.

It's also worth noting that the development team is not seeking variances or cutting corners. They're working within the City's standards—and exceeding them in areas like open space, parking, and design quality. That's rare and deserves recognition.

Please move this project forward. The Ford Road Townhomes are exactly the kind of high-quality, owner-occupied housing Newport Beach should be proud to welcome.

Best,

Michael DiPrima

**From:** [Larry Tucker](#)  
**To:** [Planning Commission](#)  
**Subject:** Ford Road Townhomes Project  
**Date:** July 03, 2025 7:20:11 AM

---

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.  
Report phish using the Phish Alert Button above.

Mr. Chairman and Members of the Planning Commission,

I had the privilege of serving 11 years as a Newport Beach Planning Commissioner, and more recently as Chair of the City Housing Element Update Advisory Committee for the 6<sup>th</sup> Cycle Housing Element. I have reviewed the Staff Report for the 27 unit project near the southeast corner of Bonita Canyon Road and MacArthur Blvd. And I have read the commentary provided by nearby residents. I don't see a legitimate basis to oppose the project. To the contrary, the project is attractive and provides a product type that is mostly missing in Newport Beach. So, I support approval of the project and hope the Commission will as well.

I would also like to share an observation that became apparent as I tried to understand the statutory framework that I had to navigate as Chair of the Housing Element Committee. The 4<sup>th</sup> Cycle and 5<sup>th</sup> Cycle updates to the Housing Element that I dealt with when I was on the Commission were benign, and almost perfunctory. However, the changes in the Housing Laws in the runup to the 6<sup>th</sup> Cycle process (and even more changes still being enacted with each legislative session) are radically different. What changed? Well, my research revealed that the State Legislature became very unhappy with local agencies that too often turned down housing applications when neighbors came out to complain about nearby projects (and/or conducted an email campaign in opposition).

So, the State Legislature enacted and the Governor signed laws that severely limit the ability of local agencies to turn down housing applications once a property is included in the Sites Inventory of a Housing Element certified by the State Department of Housing and Community Development. And to ensure that each agency adopts a Housing Element Update satisfactory to HCD by a statutory deadline, State Law now incorporates the potential for over the top penalties for failure to do so. The new laws also include severe consequences if an agency uses questionable tactics to reject a project on a site that is listed in the Sites Inventory, if the project is within the density indicated for such site in the Housing Element, and complies with the Objective Designs Standards that each agency must adopt.

Now agencies must have valid, technical reasons to turn down a project that is consistent with what is listed on the Sites Inventory. Opinions of neighbors that a project will create unacceptable traffic consequences, or even a dangerous situation, absent reports to that effect by credentialed experts, usually will not be a sufficient basis for an agency to reject a project proposed for a listed site. In other words, the ability of an agency to turn down a project even if most of the nearby neighbors

loudly object is not what it used to be. The just enacted new exemption from CEQA for certain housing projects is a seismic shift in the field of entitlement processing, with a clear message from Sacramento: The review of residential projects especially if listed on a Sites Inventory will be much more limited than in the past and most will have to be approved. Thankfully, the project before the Commission tonight will be a quality project.

Larry Tucker

---

**Subject:** FW: Opposition to Ford Road Development – Plan PA2025-0056

---

**From:** Natalie Giannulli <[natalie@carecliques.com](mailto:natalie@carecliques.com)>  
**Sent:** June 28, 2025 10:18 AM  
**To:** Arregui, Jerry <[JArregui@newportbeachca.gov](mailto:JArregui@newportbeachca.gov)>  
**Subject:** Re: Opposition to Ford Road Development – Plan PA2025-0056

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

Jerry – Can you please address the following:

1. Only 11 nearby residents were notified, if the online mailing list is correct. I would ask that the Planning Commission delay continuation of the project until the community can be adequately notified and respond. Was this intentional so that the residents would be caught off guard and it would be too late to oppose this project? Also, scheduling the meeting on July 3<sup>rd</sup> when many families are on vacation seems intentional.
2. A traffic evaluation was not required, although an estimated 300+- additional car trips would be generated. Those car trips were for residents only. This does not take into consideration the number of daily Amazon deliveries, UPS deliveries, Door Dash, Uber Eats, Uber, Lyft, etc. YIKES!!!
3. There will be no fence between the project and the park's parking lot so residents and their guests will be using parking meant for patrons of the park. No plan has been submitted to curtail illegal use of the park parking.
4. The CEQA report says there would be no deterioration of the park with no regard to the proximity of the parking lot to the actual homes. In fact, the report says there will be open access and walkways from the project to the bike path and park.
5. Construction is proposed to begin 6/1/2026.
6. Although it is mentioned in several documents, the City doesn't seem to require an access easement to use the existing ATT driveway.

Thank you for your time.

Sincerely,

Natalie Giannulli

---

**From:** "Arregui, Jerry" <[JArregui@newportbeachca.gov](mailto:JArregui@newportbeachca.gov)>  
**Date:** Friday, June 27, 2025 at 5:13 PM  
**To:** Tom & Natalie Giannulli <[natalie@carecliques.com](mailto:natalie@carecliques.com)>, "Blom, Noah" <[NBlom@newportbeachca.gov](mailto:NBlom@newportbeachca.gov)>  
**Subject:** RE: Opposition to Ford Road Development – Plan PA2025-0056

Hello Natalie,

Thank you for your input. I will include your correspondence as part of the public comments to be considered by the Planning Commission.

I am happy to answer any questions that you may have.

Thank you,



**Jerry Arregui**  
Assistant Planner  
Community Development  
Department  
Office: 949-644-3249  
100 Civic Center Drive  
Newport Beach, CA 92660



---

**From:** Natalie Giannulli <[natalie@carecliques.com](mailto:natalie@carecliques.com)>  
**Sent:** June 26, 2025 2:39 PM  
**To:** Blom, Noah <[NBlom@newportbeachca.gov](mailto:NBlom@newportbeachca.gov)>  
**Cc:** Arregui, Jerry <[JArregui@newportbeachca.gov](mailto:JArregui@newportbeachca.gov)>  
**Subject:** Opposition to Ford Road Development – Plan PA2025-0056

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

Dear Mr. Arregui and Councilman Blom,

I'm writing as a concerned resident/homeowner of the Port Streets neighborhood regarding the proposed development on Ford Road (Plan Number: PA2025-0056). I strongly oppose this project in its current form.

This area on Ford Road has parking limitations, is already heavily impacted by traffic (by those using the community parks, athletic fields, and this being a main point of access in and out of the Port Streets). In addition, traffic studies and safety concerns should to be taken into consideration. Adding 27 units—more than the 2019 proposal—and a 47-foot-tall building will only worsen congestion and strain infrastructure. The lack of clarity around ingress/egress and the proposed use of the AT&T driveway adds to my concern. Just imagine the Amazon deliveries, the Door Dash & Uber Eats deliveries, Uber, Lyft, UPS, etc.

While I understand development may occur at this site, the current scale and density are simply not appropriate for the surrounding neighborhood. I urge you to take community feedback seriously and reconsider or scale back the proposal.

Thank you for your time and for representing our interests.

Sincerely,

Dr. Thomas & Natalie Giannulli

**From:** [nick alvino](#)  
**To:** [Planning Commission](#)  
**Subject:** Strong Support of Townhouse project!  
**Date:** July 03, 2025 7:38:24 AM

---

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe.  
Report phish using the Phish Alert Button above.

Dear Chairman Rosene and Members of the Newport Beach Planning Commissioners,

I'm writing to express my support for the Ford Road Townhomes project on your July 3rd agenda. Like many cities in California, Newport Beach is facing real pressure when it comes to housing. We constantly hear about the need for more options, especially for families and individuals who want to live here but are priced out or simply can't find available homes. This project may not solve the problem on its own—but it's exactly the kind of progress we need. Every well-designed, appropriately scaled project helps, and these 27 homes will make a meaningful difference for people trying to find a place in this community.

What I appreciate most about this proposal is that it's thoughtfully planned. It includes enough parking, attractive architecture, usable open space, and a layout that respects its surroundings. The integration with the nearby Bonita Canyon trail show this is about more than just buildings—it's about creating a livable neighborhood. And frankly, this project would be a major upgrade from what's there now. The site is currently a vacant, underutilized piece of land next to an aging utility building—it's an eyesore. Transforming it into a high-quality residential community is a smart and appropriate use of that property. I strongly encourage you to approve this project. It meets the city's goals, it improves the area, and it provides needed housing without cutting corners or asking for exceptions.

Thank you for your consideration.

**Nick V Alvino**

C: 714-717-9423  
F: 714-475-5915

---

**Subject:** FW: Plan Number: PA2025-0056,

---

**From:** [strelzowv@aol.com](mailto:strelzowv@aol.com) <[strelzowv@aol.com](mailto:strelzowv@aol.com)>  
**Sent:** July 03, 2025 8:22 AM  
**To:** Arregui, Jerry <[JArregui@newportbeachca.gov](mailto:JArregui@newportbeachca.gov)>  
**Subject:** Plan Number: PA2025-0056,

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

I am strongly apposed to your selling out our safe and tranquil neighborhood's safety and lifestyle.

Especially for base developers financial gains rather than supporting building some more useful facility for our communities betterment & that of our children!

This is not what public servants are chosen and dedicated to do!...This shall not stand!



**From:** [James Lloyd](#)  
**To:** [Planning Commission](#)  
**Cc:** [Jurjis, Seimone](#); [Brown, Leilani](#); [Leung, Grace](#); [Harp, Aaron](#); [City Clerk's Office](#); [Murillo, Jaime](#); [CDD](#)  
**Subject:** public comment re item 3 for tonight's Planning Commission hearing  
**Date:** July 03, 2025 11:17:57 AM  
**Attachments:** [Newport Beach - 1650 Ford Road - HAA Letter.pdf](#)

---

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.  
Report phish using the Phish Alert Button above.

Dear Newport Beach Planning Commission,

The California Housing Defense Fund ("CalHDF") submits the attached public comment re item 3 for tonight's Planning Commission hearing, letter to remind the City of its the proposed 27-unit housing development project at 1650 Ford Road.

Sincerely,

James M. Lloyd  
Director of Planning and Investigations  
California Housing Defense Fund  
[james@calhdf.org](mailto:james@calhdf.org)  
CalHDF is grant & donation funded  
Donate today - <https://calhdf.org/donate/>

---

**Subject:** FW: Stop The 4302 Ford Road Project

---

**From:** Bobbi Robinson <[bobiroboc@gmail.com](mailto:bobiroboc@gmail.com)>  
**Sent:** July 03, 2025 10:38 AM  
**To:** Arregui, Jerry <[JArregui@newportbeachca.gov](mailto:JArregui@newportbeachca.gov)>  
**Subject:** Stop The 4302 Ford Road Project

**[EXTERNAL EMAIL] DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe. Report phish using the Phish Alert Button above.

Dear, Jerry Arregui,

NO to increased pollution, noise, traffic, increased street parking, speeding, abandonment of PUBLIC SAFETY and NO to politicians who stand on my front porch and tell me they are against increased traffic, high density ( like in L.A.) increase in pollution and they want to keep Newport beautiful and not in anyway like Los Angeles.

B. Robinson



Jul 3, 2025

City of Newport Beach  
100 Civic Center Drive  
Newport Beach, CA 92660

Re: Proposed Housing Development Project at 1650 Ford Road

By email: [planningcommission@newportbeachca.gov](mailto:planningcommission@newportbeachca.gov)

CC: [sjurjis@newportbeachca.gov](mailto:sjurjis@newportbeachca.gov); [lbrown@newportbeachca.gov](mailto:lbrown@newportbeachca.gov);  
[gleun@newportbeachca.gov](mailto:gleun@newportbeachca.gov); [aharp@newportbeachca.gov](mailto:aharp@newportbeachca.gov);  
[cityclerk@newportbeachca.gov](mailto:cityclerk@newportbeachca.gov); [jmurillo@newportbeachca.gov](mailto:jmurillo@newportbeachca.gov);  
[CDD@newportbeachca.gov](mailto:CDD@newportbeachca.gov)

Dear Newport Beach Planning Commission,

The California Housing Defense Fund (“CalHDF”) submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 27-unit housing development project at 1650 Ford Road. These laws include the Housing Accountability Act (“HAA”), AB 130, and California Environmental Quality Act (“CEQA”) Guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subd. (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible unless, again, such written findings are made. (*Ibid.*) As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA’s ambit, and it complies with local zoning code and the City’s general plan. The City must therefore approve the project unless it makes written findings regarding health and safety as mentioned above – which it cannot do since the preponderance of the evidence in the record does not support such findings. (*Id.* at subd. (j).) Furthermore, if the City rejects the project or impairs its feasibility, it must conduct “a thorough analysis of the economic, social, and environmental effects of the action.” (*Id.* at subd. (b).)

Additionally, the project is exempt from state environmental review pursuant to section 15183 of the CEQA Guidelines, as the project is consistent with a previously certified

Program Environmental Impact Report (SCH No. 2023060699). Furthermore, the project is eligible for a statutory exemption from CEQA pursuant to AB 130 (Pub. Res. Code, § 21080.66), which was signed into law on June 30, 2025 and effective immediately (Assembly Bill No. 130, 2025-2026 Regular Session, Sec. 74, available [here](#)). Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

CalHDF notes that the City's Housing Element planned for 64 units of housing on the site, which included 19 units planned to be affordable to lower-income households. Pursuant to Government Code section 65863, the City must make "no net loss" findings that the remaining sites in its Housing Element site inventory are adequate to accommodate its share of the Regional Housing Needs Allocation. These findings must "include a quantification of the remaining unmet need for the jurisdiction's share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level." (Gov. Code, § 65863, subd. (b)(2).) If the City cannot make such findings – in other words, if the remaining sites in the City's Housing Element site inventory cannot accommodate the City's housing need – then the City must identify and rezone additional sites within 180 days to ensure it maintains zoned capacity for its share of the Regional Housing Needs Allocation. (*Id.* at subd. (c)(2).)

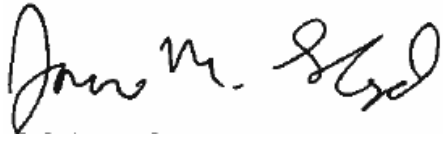
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: it will bring new customers to local businesses; it will grow the City's tax base; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at [www.calhdf.org](http://www.calhdf.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dylan Casey', with a stylized, looping flourish extending to the right.

Dylan Casey  
CalHDF Executive Director

A handwritten signature in black ink, appearing to read "James M. Lloyd". The signature is fluid and cursive, with the first name "James" being the most prominent part.

James M. Lloyd  
CalHDF Director of Planning and Investigations