

**From:** Jim Mosher  
**To:** [Planning Commissioners](#)  
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Dear Planning Commissioners,

Please find attached some written comments on March 8's Item 8 (the General Plan status report).

Yours sincerely,

Jim Mosher

## March 8, 2018, Planning Commission Item 8 Comments

These comments on a Newport Beach Planning Commission agenda item are submitted by:

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### ***Item No. 8. 2017 GENERAL PLAN STATUS AND PROGRESS REPORT (PA2007-195)***

This comment is in two parts because the totality of promises made in the various Implementation Programs is rarely evident from the brief captions and examples provided in the report (Attachment PC 2), and can instead often be discerned only by reading the full programs, and the prefatory material leading up to them, in the [Implementation Program](#) (Attachment PC 1).

Based on a partial reading the Implementation Program, the first part of these comments expresses my own citizen's view of the status of the City's General Plan, and its compliance with it, much of which I think is missing from the City's report.

The second critiques the posted staff report, and, for the most part, rather than repeating what I think is missing, notes only what seem to me errors in what *is* said.

Given the length of the documents being reviewed, and the complexity of the issues touched upon within them, both sections remain incomplete, but especially Part 1.

#### **Part 1: Thoughts on Reading Attachment PC 1 General Plan Implementation Program (General Plan Chapter 13)**

At its most basic level, the fact the City makes so little effort to maintain its General Plan in a transparent way suggests the General Plan is not taken as seriously as it could and should be.

- No printed copies of the complete current GP appear to be available for review.
- The [online version](#) is posted in multiple PDF's (lacking individual Tables of Contents) with most of the illustrations segregated out in separate files (but without links to them), making it difficult to follow.
- The PDF's appear to have been prepared using subtly different formatting than the now out-dated [printed "July 25, 2006" copies](#) held by the City's libraries, causing the page numbers to frequently differ and making it especially difficult to tell what, if anything, in the text has changed.
- What purports to be the online [Table of Contents](#) appears to be a facsimile of the TOC in the 2006 library copy, which means it does not match the page numbers in the slightly differently formatted online elements, and has no connection with such things as the current [Housing Element](#) (twice replaced since 2006 – the most recent incarnation of which *does*, to its credit, contain a TOC and the illustrations).
- It contains no place to record changes to it. Hence to discover what has changed, and when, one has to rely on a cumbersome, non-transparent, non-self-explanatory (and now barely functional) external list of online links to [General Plan Amendments](#). However, that list is incomplete, since it does not list changes to the development limits

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and conceivably policies, rightly or wrongly, not regarded by the City as GPA's. These include such things as staff's addition of 300,000 sf of development potential to Newport Coast (approved with Planning Commission [Resolution 2030](#) in 2016), and numerous transfers and "conversions" purportedly altering the development limits listed in the GP Land Use tables but shown nowhere in the General Plan (the failure to show these in the tables is a very serious concern since it evades the [Greenlight](#) assumption that all modifications to the Plan would be memorialized by amendments to it). There is also no way for the public to know if administrative "corrections" to the plan, not discussed or disclosed at any public meeting, have been made since 2006.

- This may be contrasted with other significant documents maintained by the City, such as most [Planned Community texts](#), and by other agencies, such as the [JWA Access Plan](#), in which each change since adoption is carefully footnoted and explained (or, for that matter, the City's own Zoning Code, which includes extensive annotations and a complete [Ordinance List](#) – recognizing changes can be made only by ordinance).
- The present ongoing review does not appear in the [case log](#) of current Planning Division activities.

Compounding this apparent lack of concern about making the current General Plan, including the currently applicable development limits, a transparently available document, the City, in both project approvals and reviews like this, frequently displays what appears to be an attitude (undoubtedly common in other bureaucracies) of feeling compliance has been demonstrated if one or more instances of compliance can be found, while failing to reflect on policy promises that have not have been fulfilled, and worse, ignoring actions taken in clear non-compliance with the stated policies.

To demonstrate this lax sense of the meaning of "compliance," one does not have to read beyond the second paragraph of the introduction to the [Implementation Program](#) (Chapter 13), as reproduced on handwritten page 5 of the staff report:

*"The programs described herein may change over time" and "the General Plan Progress Report required to be prepared annually, as described in Imp 1.3 below, should review the continuing applicability of the programs and update this list as necessary."*

Conditions have certainly changed since Chapter 13's adoption in 2006, but I find so such review in the current Report, and to the best of my knowledge, not a single update to any program – not even a correction of spelling or punctuation -- has ever been made. To me, that lack of reflection hardly seems like compliance.

#### **Regarding the specific programs described in Chapter 13 of the General Plan (Attachment PC 1):**

**Imp 1.1** (handwritten page 6): Although ignored in staff's review, I have a problem with the very first sentence: "a city's decisions regarding its physical development must be consistent with the adopted General Plan." The Newport Beach General Plan chooses to set clear limits for allowable development in each area, including "Anomalies". Yet the City has a recent history of approving projects whose allowed development exceeds and is inconsistent with the stated

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limits. For example, nothing in [Tables LU1](#) and [LU2](#) of the Land Use Element explains how 524 dwelling units could have been approved at [Villas Fashion Island](#) in Anomaly 48, or a 387,500 square foot [PIMCO Tower](#) in Anomaly 40, or the 347,552 sf Irvine Company HQ Tower in Anomaly 39. Conversely, Table LU2 lists substantially more hotel rooms being allowed in Newport Center than staff says are “actually” allowed. Past Community Development Department administrations dismissed this problem by referring to the limits stated in the General Plan as a mere “snapshot in time,” with the *true* limits known and carefully tracked by City staff. That does not seem to me an attitude of regarding the General Plan as the supreme land use document, with all others subordinate to it.

As indicated earlier the failure to amend the General Plan Land Use Tables to justify approved development is at the center of an ongoing dispute with organizations like SPON as to whether land use approvals such as those for the 150 Newport Center or Museum House project General Plan Amendments in Newport Center should have gone to an automatic Greenlight vote because of earlier approvals by the Council to convert voter-approved non-residential uses in Newport Center to 79 residential units, putting the new proposals over the Council’s authority, under Greenlight, to add at most 100 units to a statistical area over any 10 year period.

Moving on to the second paragraph, I am told the City’s proposals for public works must be reviewed each year by the Planning Commission and that the City is supposed to have a “five-year Capital Improvement Program.” Regarding the first, the last such review I recall was [Item 2](#) on June 6, 2013. Regarding the second, does the City have a five-year Capital Improvement Program? I know it has a longer range [Facilities Financial Plan](#) (for replacement of buildings), but building replacements are only part of a City’s project capital expenditures. And how can the lack of Planning Commission review since 2013 be regarded as compliance with the General Plan?

Also in that paragraph, I learn the Planning Commission is supposed to be reviewing outside agencies plans for public works within the City limits. When was the last time the PC reviewed a Sanitation District project? The Orange Coast College Sailing Center bridge over PCH? Or the CdM High School Sports Complex?

**Imp 1.1** likewise raises the question of how compliance of *private* development with the General Plan is ensured. Given the attitude detailed above, I have to doubt the thoroughness of the compliance testing. Does Planning staff have a systematic list of project details that need to be compared against GP policies? And does Planning staff consider consistency with chapters other than the Land Use Element?

In that connection, earlier reports listed the City’s 2012 approval of development at **Banning Ranch** as an accomplishment. This year’s report mentions in passing the City’s 2017 repeal of those approvals. But it fails to mention the reason for the repeal, which was the California Supreme Court decision in *Banning Ranch Conservancy v. City of Newport Beach*, [2 Cal. 5th 918](#) (2017) – a decision that surely should have been cause for reflection regarding the City’s land use approval process and compliance with the General Plan.

The Supreme Court found the Banning Ranch EIR failed to properly disclose likely disagreements between the City and California Coastal Commission regarding the amount of

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environmentally sensitive habitat area on the property (the City's attitude having been to approve the development and then let the CCC work out whether it was allowed).

The Court found the EIR was inadequate, and would have to be rejected with or without guidance from a General Plan. As a result, it did not have to answer the question of whether the City followed its General Plan, including its Implementation Programs. Yet, that question was at the core of the dispute in the lower courts, where it was answered with conflicting conclusions.

Although the trial court found the City had *not* followed its General Plan, in 2015, the Fourth District Court of Appeals (in [236 Cal. App. 4th 1341](#)) took a very narrow, and apparently erroneous, view of the City's General Plan, noting (see 1348 in the page notations in the left hand margin of the display) that to delineate wetlands and habit in cooperation with state and federal agencies per [Policy LU 6.5.6](#) the General Plan calls out Imp 14.7 ("Coordinate with the California Resources Agency, Department of Fish and Game") and Imp 14.11 ("California Public Utilities Commission") but *not* Imp 14.6 ("Coordinate with California Coastal Commission").

Surely the California Supreme Court decision should provide reason for the City to add Imp 14.6 to the procedures needed to delineate habitat, and to correct what the Fourth District Court seemed to obtuse to observe, namely that the references to Imp 14.11 ("California Public Utilities Commission") here, and in several other General Plan policies (LU 3.4, LU 6.3.2 and LU 6.5.3) were clearly typos, and were meant, instead, to encourage cooperation with federal agencies – presumably Imp 14.13 ("Coordinate with United States Fish and Wildlife Service") and possibly Imp 14.12 ("Coordinate with United States Army Corps of Engineers"), since both of those program descriptions specifically mention Banning Ranch habitat.

And, rather shockingly, a directive to follow Imp 14.6 ("Coordinate with California Coastal Commission" which includes the City's own obligation to find development compliant with the California Coastal Act after certification of the LCP) does not appear to be called out as program needed to support policies *anywhere* in the Land Use Element of the General Plan -- although it does appear repeatedly in the Harbor and Bay Element, and at one place in the Natural Resources Element (Policy NR 14.3 – where an erroneous reference to Imp 14.11 appears, once again). In fact, *all* the references in the body of the General Plan to Imp 14.11 ("California Public Utilities Commission") appear to be erroneous. See, for example, HB 7.2. They seem to have been intended to be references to either Imp. 14.12 or 14.3, or it that case possibly both.

One can only wonder how many other erroneous citations to Implementation Programs exist in the body of the General Plan, and how many Programs are not cited as necessary to support a policy when they really are?

More generally, the California Coastal Commission and Supreme Court decisions suggest that to comply with the Implementation Program's commitment to continuously adapt the General Plan to changing conditions, the entire narrative and policies regarding Banning Ranch in the GP needs to be rethought.

**Imp 1.2** (handwritten page 7): This program tells me that not just for the Implementation Program, but for the General Plan itself, changing conditions will be reviewed and policies

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amended to retain their effectiveness, with the Public Infrastructure and Services Plans and Public Service Programs of the IP being particularly in need of frequent review and revision.

While the Housing Element has been extensively revised twice since 2006, a very minor change made to the Safety Element, and many amendments applied to Table LU2 of the Land Use Element, I am not aware of any policy or other aspect of the General Plan – not even spelling or punctuation errors – having been changed since 2006. While it is true a series of revisions was proposed in 2014 contingent upon voter approval of the ill-fated [Measure Y](#), the failure to actually make any changes since 2006 – and instead rely on some future “comprehensive update” – does not seem compliant to me.

**Imp 1.3:** The last sentence of the first paragraph tells me “*the Report must specify the degree to which the approved general plan complies with the General Plan Guidelines published by the Governors Office of Planning and Research (OPR) and the date of its last revision.*” I am not aware of the present report informing anyone of the date of the last revision of our City’s General Plan or the extent to which it complies with the OPR’s *General Plan Guidelines*. And since the OPR adopted completely [new General Plan Guidelines](#) in 2017, shouldn’t that have triggered a reassessment of whether our Plan complies with them?

**Imp 2.1:** Regarding the Zoning Code, this program notes “*it is common practice for communities to revise their zoning within a 12- to 18-month time period.*” Newport Beach clearly missed that target by taking four years to amend its Zoning Code to conform to the General Plan adopted in 2006. But in addition, it calls for revision of not just the Zoning Code, but also subservient documents. When were the City’s Planned Community texts checked for consistency with the 2006 General Plan? Design Guidelines? And why were the specific plans praised in the 2006 GP removed from the Zoning Code rather than expanded and refined?

**Imp 3.1:** The prefatory language to this program speaks with apparent pride of six existing specific plans the Zoning Code (as of 2006) and a placeholder for one expected to be developed for Corona del Mar. Only one of them, Santa Ana Heights, survived the 2010 update of the Zoning Code. Why is this? And why was there no follow-through on the projected new specific plans mentioned in Imp 3.1 (specifically, West Newport Mesa, which was not given a “Planned Community” option, and areas near the Airport not under common ownership)?

[note: my Part 1 commentary ends here, barely into the Implementation Program, not because I’m out of comments, but because I’m out of time]

## **Part 2: Thoughts on Reading Attachment PC 2 General Plan Annual Status Report**

Title page (handwritten 38), last sentence: “*This report evaluates and provides the status of the General Plan **provided** organized by each implementation program.*”

**Imp. 1.1** “2. In June 2017, the City Council confirmed that the 2017-2018 Fiscal Year Capital Improvement Program (CIP) was consistent with the General Plan when it approved the CIP with the adoption of the budget.” This is easy to say, but it does not sound right to me. I am



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unable to find any mention of the words “General Plan,” let alone consistency with it, in anything related to the Council’s June 13, 2017, adoption of the budget (agenda [Item 14](#)).

**Imp 1.2:** “*Staff reviews the General Plan on an ongoing basis to ensure it is maintained to reflect current conditions, issues, and visions.*” Have these reviews resulted in any actions? I am not aware of any changes being recommended as a result of them.

**Imp 1.3:** See comments in Part 1, above. This program promises to report the revision date of the City’s General Plan, and the degree to which it complies with the latest OPR *General Plan Guidelines*.

**Imp 2.1:** “*Comprehensive Zoning Code Update, consistent with the General Plan, was adopted by City Council in October 2010.*” The IP asks for subservient documents such as Planned Community texts to be reviewed and updated, as well. Have they been? And regarding the Zoning Code, it lists five specific goals the update was supposed to accomplish. Were those goals achieved?

**Imp 3.1:** “*Within the Airport Area, Uptown Newport and Koll Center ~~also~~ elected to do a Planned Community Development pursuant to Program 4.1.*” [“also” is no longer appropriate, since the sentence before this was dropped]

**Imp 4.1:** “*1. Uptown Newport – Approved February 2013, the Uptown Newport Planned Community (PC) was created (~~formally~~ ~~formerly~~ a part of the Koll Center Planned Community) ... The construction of the first phase is underway with ~~the~~ building permits for the construction of 455 apartment units including 91 affordable units ~~were~~ issued in May 2017.*”

In addition, the Planning Division’s Case Log lists the Newport Dunes Hotel (PA2016-175) as seeking a PC, as well as the likely-now-abandoned request from the former ExplorOcean (PA2014-069).

**Imp 5.1:** It is good to hear the City’s [Coastal Land Use Plan](#) was amended in 2009 to achieve consistency with the General Plan that had been adopted in 2006, and that it is updated as changes are made to the GP. But based on the City’s other performances, I doubt the consistency is perfect. And I find it curious the City Library doesn’t have a single printed copy of the CLUP, old or new, in its catalog.

**Imp 7.1:** “*The 2017 California Building Code was adopted by the City in late 2017, and was effective starting January 2018, as required by State Law.*” I do not believe this is correct. The state Building Code is updated in three year cycles. The City’s version was adopted in 2013, and most recently as [Item 4](#) on the Council’s November 22, **2016**, agenda (not **2017**). I am unaware of it having been replaced by a 2017 edition.

**Imp 7.2:** “*The completion of updating the Fair Share Traffic fee has been put on hold until direction is determined regarding various iterations proposed by the General Plan/LCP Implementation Committee, project consultants and interested parties such as the Building Industry Association of Orange County.*” To the best of my knowledge, the General Plan/LCP Implementation Committee no longer exists. Why has no action been taken to complete this?

**Imp 8.1:** It is unclear why the review of codes is confined to the ones listed, which Imp 8.1 says are simply “representative” of those needing review. Among those, the statement under “c” that

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harbor standards approved by the City Council in 2017 increased the required height of bulkheads to +10 Mean Low Low Water (MLLW) is interesting both in that may or may not be standard being used by the Planning Division in considering Coastal Development Permits, and in the event of sea level rise it is expressed in a system with a changing reference point related to the observed tides (MLLW) whereas planning approvals appear conditioned on adhering to heights in a fixed and unchanging geographically-based system (NAVD88).

**Imp 8.2:** Considering the widespread concern over “mansionization” many residents seem to be questioning whether the design standards of “b” have been adequate to achieve the objective of ensuring that residential redevelopment “*complement[s] the character of existing development.*”

**Imp 9.1:** The statement regarding Council Policy updates completed in 2017 is inaccurate. In addition to the updates mentioned, as part of the August 8, 2017, Item 18, the Council accepted a sub-committee recommendation “*to revise 26, consolidate 17, and delete 16*” policies. Nothing in the report or adopting resolution indicates that consistency with the General Plan was a consideration in that review or updating, or for that matter in the other policy updates made in 2017.

**Imp 10.1:** If new layers were added in 2017, it would have seemed helpful to describe what they are.

**Imp 10.2:** This program requires staff to track the amount of development capacity remaining under the current General Plan limits.

The first paragraph, saying the information is available on an as-requested basis is a significant backtracking from [last year's promise](#) that “*City staff is developing a user-friendly format that will be posted on the Planning Division website.*”

The second paragraph confuses the tracking required by Imp 10.2 with the “Entitlement Tables” which, since 2001, have been required by [Council Policy A-18](#) implementing [Charter Section 423](#) (Greenlight).

Both kinds of tracking are currently problematic because they relate to the development limits (and amendments to those limits) stated in the General Plan. But the City claims development is allowed to different a different set of limits established through non-General-Plan-amending transfers and conversions of the stated (and in some cases, voter approved) uses – something many citizens object to.

**Imp 11.1:** As indicated in the first part of this written public comment, one would certainly think the 2017 California Supreme Court decision regarding the inadequacy of the Banning Ranch EIR would cause the City to reflect on the adequacy of its CEQA compliance policies.

**Imp 12.1:** The accomplishments listed in the first sentence do not appear to be relevant to calendar year 2017.

**Imp 13.1:** Should this item mention that the Museum House Development Agreement, listed as an accomplishment in the 2016 report, was repealed in 2017?



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Regarding the “Koll Center Newport” (actually “Koll Center Residences”) project, who is doing the negotiating? In the past an “ad hoc” City Council subcommittee was appointed for that purpose, but I am not aware of any having been appointed in 2017.

**Imp 14.1:** Why has City participation in borders committees not been maintained?

**Imp 14.6:** What is the status of the “Fostering interest in Nature” program promised to the Coastal Commission to mitigate for the lack of low cost visitor serving accommodations at the Lido House Hotel?

**Imp 14.7:** Michelle Clemente no longer seems to be with the City.

**Imp 14.8:** I believe “*Natural Resource Division*” (for the Recreation and Senior Services Department) is meant to be “*Natural Resources Division*” (as in Imp 14.7).

Regarding Accomplishment 3, there is a rumor that the Isopod went missing, but has been found and restored.

Accomplishments 4 and 5 appear to be part of the same thing, and I am aware that despite this being listed as an accomplishment, some people feel the City’s commitment to Snowy Plover habitat is inadequate near the mouth of the Santa Ana River, where unpermitted dog activity is allowed to persist.

**Imp 14.9:** The two bullets appear to refer to the same thing.

**Imp 14.15:** “*The distribution facility was relocated to Santa Ana and Anaheim. The Mariners Mile location maintains a drop-off box.*” This seems to me to be a complete misunderstanding, triggered by the incorrect use of the term “distribution facility” in the General Plan. To the best of my knowledge, the post office on Riverside Drive was never a regional distribution facility of the sort found in Santa Ana and Anaheim. It was simply a post office, and as far as I know it has not turned into a drop-off box or relocated to Santa Ana or Anaheim. It still has boxes and a service counter and has mostly just moved to a different part of the shopping center.

**Imp 14.11:** As noted in the first part of these written comments, this is an interesting program in that a number of accomplishments are listed, but none of the General Plan policies appear to call on it to support them. It was presumably intended as a call-out to Policy NR 21.3 (“Overhead Utilities”), but that policy erroneously calls on Imp 14.13 (“Coordinate with United States Fish and Wildlife Service”) and fails to cite Imp 31.1 (“Consider the Establishment of Community Facilities and Special Assessment Districts”).

These kind of errors and oversights make one wonder if staff actually regards and uses the General Plan as an important controlling document that needs to be referred to in making day-to-day decisions.

Since the most recent date cited in the present staff report is 2013, one has to wonder how up-to-date that is, as well.

**Imp 14.16:** “California State Parks” is listed as an “Other Agency,” but it earlier has its own Imp 14.8. Why is it in the Other Agencies list?

**Imp 16.4:** This appears to be an “*Ongoing*” rather a “*Complete*” program.

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**Imp 16.5:** *"The City monitors the regional Arterial Program, OCTA's Master Plan, and the County-wide traffic model to ensure consistency."* I believe the 19<sup>th</sup> Street bridge (over the Santa Ana River) was removed from OCTA's Master Plan some years ago, but is still in our Circulation Element. How is that "ensuring consistency"?

**Imp 16.6:** Weren't things done in 2017 regarding Newport Heights traffic and Peninsula crosswalk striping?

**Imp 16.8:** The 2016 report listed the "Downtown" as an accomplishment. Shouldn't the 2017 report indicate that service was discontinued?

**Imp 16.11:** The last sentence of the first paragraph is a hold-over from 2016 and should be deleted (the topic is updated in the preceding sentence). The last sentence should be corrected: *"Bicycle racks were added to Marine Avenue creating a bicycle ~~corral~~ corral."*

**Imp 18.1:** One paragraph refers to a "Sewer Master Plan" and the other to a "Wastewater Master Plan." Are those the same, or different?

**Imp 19.1:** In the first sentence, the same \$5.5M total is quoted as in the previous year, even though there were presumably changes in the list. Such a coincidence is possible, but seems unlikely.

In the last sentence, the number of catch basins has increased compared to 2016, but the amount of debris collected -- 538 tons -- is precisely the same. Again, such a coincidence is possible, but seems unlikely.

**Imp 20.1:** The first paragraph appears to be something left over from 2016 and not relevant to the 2017 report.

Wouldn't the Façade Improvement Program in Balboa Village be something to list under this program?

The West Newport Revitalization efforts of a former City Council's Ad Hoc Neighborhood Revitalization Committee and its "CAP"s seem long ago things reported as if they happened in 2017.

**Imp 20.3:** *"Back Bay View Park Enhancements - Upgrade water fountain with bottle filler and doggie bowl, ~~add~~ and add bike fixit station was finished in October 2017."*

**Imp 21.3:** *"For the ~~seventh~~ eighth year, City staff teamed up with The Orange County Water District to provide education on how to protect our coast and waterways from trash at the 21st Annual Children's Water Education Festival on March 29 ~~and 30~~ and 30, 2017, at the University of California, Irvine."* [the 2016 report also said "seventh"]

**Imp 21.4:** *"A joint City/County study that evaluates the costs and efficiency of current services provided by the City and County in Newport Harbor and opportunities to realign these to reduce costs has not been conducted to date and may be prioritized in the future based on needs and funding."* This seems very out of date. To the best of my knowledge the study never took place (or rather, the County was found a less expensive alternative to other interested outside bidders), but the City Manager nonetheless announced a transition to a City Harbormaster

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model, replacing many of the former County Harbor Patrol functions, which commenced on July 1, 2017.

**Imp 23.2:** “2. Bonita ~~Creek Canyon~~ Sports Park – Installation of Pickleball Courts at Bonita Canyon Sports Park.”

**Imp 23.3:** “The Recreation and Senior Services Department continuously analyzes enrollment numbers in existing recreation programs and periodically ~~initiate~~ initiates community surveys to assess the current needs of the community.”

**Imp 23.4:**

“4. Beach volleyball nets donation, in memory of Ron Hanks ~~and Neil Neal~~ Cline.”

“12. The City provides shuttle bus services for the Dayle Lusk, Tumble-n-~~Kida Kids~~”

“16. Health and wellness of the ~~Oasis~~ OASIS Senior Center clients on an as-needed basis.”

**Imp 29.3** (last sentence): “On December 12, 2017, the City Council adopted Ordinance No. 2017-17, which repealed ...”

**Imp 30.2:** “3. ... Commercial Piers: Study is underway with **anticipated** Council adoption by Spring 2017.” Didn’t what was anticipated either happen or not?

**Imp 31.1:** The 2016 report said “staff will return to the City Council with various options for review and direction” regarding “a new community center in West Newport.” The present report does not explain what happened to that plan.

## Housing Element Annual Report

**General note:** Since the Housing Element Programs are presented outside the context of the Housing Element itself, including not showing the “Responsibility” and “2014-2021 Objective” attached to each, it is difficult to assess the accuracy or completeness of what is being reported in the current item.

**Handwritten page 72:** Is it really true that halfway through the 2014-2021 cycle, the City has not yet met its requirement to add just **one** new unit each in the **moderate**, **low** and **very low** income housing categories?

**Program 3.2.4:** “The VUE Newport ~~formally formerly~~ known as Newport Bay Marina project was identified as an underutilized site.” It might be noted the City’s current Mayor does not feel the site was underutilized, and finds VUE Newport a poor (and itself underutilized) replacement for what was there (namely, boatyards and marine-supporting uses).

**Program 4.1.7:** “City staff worked closely with OCHA staff to facilitate the award of the Veterans Affairs Supportive Housing (VASH) Vouchers to the Newport ~~Shores Veterans~~ project (See Program 4.1.4)” Compared to last year’s report, the name has been changed (in this way) in all the other references to it.

**Program 5.1.7:** “The City also operates the ~~Oasis~~ OASIS Senior Center.”