

## Switzer, Donna

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**From:** Julie Ault <jbas082005@gmail.com>  
**Sent:** Monday, January 19, 2026 11:08 AM  
**To:** CITY COUNCIL (INCL. CMO STAFF); supplementalcomm@surfcity-hb.org  
**Subject:** Opposition to Redevelopment Application for The Huntington Club  
**Attachments:** HB Council 01192026.pdf

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Please see attached opposition to proposed redevelopment plan of The Huntington Club property to remove recreational space and develop hotel units.

This communication should be placed with the record for any future agenda item for this application.

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Julie Ault-Snyder  
(714) 401-7627  
[JBAS082005@GMAIL.COM](mailto:JBAS082005@GMAIL.COM)

January 19, 2026

City of Huntington Beach  
2000 Main Street  
Huntington Beach, CA 92648

Dear Members of the City Council,

I am writing to formally express my opposition to the proposed renovation of The Huntington Club. After careful consideration, I believe the project poses significant risks to employees, the economy of Huntington Beach, the environment, adjacent property owners, club members, and the surrounding community, and that these concerns outweigh the potential benefits of the renovation.

#### **Economic Impact on Employees**

The proposed renovation threatens the livelihoods of many employees who depend on the club for stable, ongoing employment. Renovation-related closures, staffing reductions, or long-term operational changes could result in job losses, reduced hours, and financial instability for workers and their families. At a time when economic security is critical for our community, this project introduces unnecessary risk to an established workforce.

#### **Open Space/ Recreational Amenities**

A well planned city with abundant recreational areas and open space is imperative to maintaining property values and the active lifestyle which makes Huntington Beach a great place to live. This project removes from our community tennis courts, outdoor event spaces, and access to green spaces and bodies of water for the enjoyment of the community. Densification of even a members only club diminishes the community at large because current members may invite guests to enjoy these recreational spaces and further the club allows events such as weddings and social gatherings for non-members. Redevelopment to remove these community friendly amenities in favor of 'for rent' bungalows is taking space that currently enhances the City and the lives of its residents in favor of economic gain to the owner solely for the pleasure of tourists. The City is already overwhelmed with tourists and the quality of life for residents will be lessened by this development.

#### **Impact on Adjacent Home Values**

Years of construction noise and dust as well as the introduction of non-residents to this one-of-a-kind area in the Sea Cliff community will negatively impact home values in the Sea Cliff neighborhood. Few areas of the City are as alluring, quiet and amenity filled as Sea Cliff. The homes retain value due to the character of the neighborhood. Introduction of a retail/hotel type facility within this neighborhood is counter to the master planned design and will negatively impact property values. Reduced property values will decrease revenue to the City.

#### **Environmental Impact**

The renovation raises serious environmental concerns, including potential damage to green space, increased water usage, disruption to local wildlife, and a larger carbon footprint from construction activities. The country club currently serves as an important environmental buffer

and open space within the community, and large-scale renovation could irreversibly harm this balance.

### **Lack of Member Support**

A significant number of club members oppose the renovation. Many value the club as it currently exists and do not believe the proposed changes reflect their interests or priorities. Moving forward with a project that lacks broad member support undermines trust and disregards the voices of those most directly affected.

### **Community Impact**

Beyond the club itself, the renovation would negatively affect the surrounding community through increased noise, traffic, congestion, and construction disruption. These impacts would extend over a prolonged period and diminish the quality of life for nearby residents, while offering limited benefit to the wider public.

### **Wellness and Mental Well-Being**

The country club serves as a place of recreation, stress relief, and social connection for many members. Extended construction, loss of access, and uncertainty surrounding the club's future would negatively impact on both physical wellness and mental well-being. Preserving stable, accessible recreational spaces is essential to maintaining community health. The property owners have already benefitted from a 'buy in' from each member based upon the promise of providing the recreational amenities that they now seek approval to remove. Such a fundamental change in the offerings of The Huntington Club will trigger an exodus from the club, destabilizing the livelihood of this location in the future and likely lead to residents traveling outside the City to neighboring Newport Beach for similar recreation opportunities.

For these reasons, I respectfully urge the City Council to reconsider approval of the proposed renovation and to prioritize solutions that protect residential owner property value, further access to recreation and open space for residents of the City, protect employees, respect environmental sustainability, reflect member consensus, and safeguard the well-being of the broader community.

Thank you for your time and consideration.

Sincerely,

*Julie Ault*

Julie A. Ault-Snyder

92648

[JBAS082005@gmail.com](mailto:JBAS082005@gmail.com)

**From:** [Elizabeth Hartman](#)  
**To:** [supplementalcomm@surfcity-hb.org](mailto:supplementalcomm@surfcity-hb.org)  
**Subject:** Fwd: Conditional Use Permit No. 22-011 / Coastal Development Permit No. 22-009 Huntington Club Remodel and Bungalows – 6501 Palm Avenue Planning Commission Hearing: January 27, 2026  
**Date:** Tuesday, January 20, 2026 7:21:56 PM

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Elizabeth Hartman

t: 770-344-9236

Sent from my iPhone misspellings and all...

Begin forwarded message:

**From:** Elizabeth Hartman <[hartmanhouseoc@gmail.com](mailto:hartmanhouseoc@gmail.com)>  
**Date:** January 20, 2026 at 7:18:31 PM PST  
**To:** [City.Council@surfcity-hb.org](mailto:City.Council@surfcity-hb.org)  
**Cc:** [Connor.Hyland@surfcity-hb.org](mailto:Connor.Hyland@surfcity-hb.org), [permitcenter@surfcity-hb.org](mailto:permitcenter@surfcity-hb.org), [planning.commission@surfcity-hb.org](mailto:planning.commission@surfcity-hb.org), [SouthCoast@coastal.ca.gov](mailto:SouthCoast@coastal.ca.gov)  
**Subject:** RE: Conditional Use Permit No. 22-011 / Coastal Development Permit No. 22-009 Huntington Club Remodel and Bungalows – 6501 Palm Avenue Planning Commission Hearing: January 27, 2026

Honorable Mayor and Members of the City Council,  
Honorable Members of the Planning Commission,  
City Attorney's Office,  
and Interested Coastal Commission Staff:

This letter is submitted to formally object to, and preserve all legal objections regarding, the proposed Huntington Club Remodel and Bungalows project. These comments are submitted pursuant to the Huntington Beach Municipal Code ("HBMC"), the California Coastal Act, and the California Environmental Quality Act ("CEQA"), and are intended to be included in the administrative record for all current and future proceedings, including appeals and judicial review.

#### I. MISCLASSIFICATION OF USE UNDER HBMC TITLE 21

The project proposes four detached bungalow structures and two loft units intended for overnight occupancy. Although characterized as "lodging for club members," the form, scale, and function of these structures are inconsistent with an accessory or incidental use under HBMC Title 21.

Accessory uses must be clearly subordinate and incidental to the principal permitted use. Detached, habitable structures designed for repeated overnight occupancy are neither incidental nor subordinate to a private recreational facility. The bungalows are independent structures, physically and functionally distinct from the golf and tennis operations, while the loft units are of a size and configuration consistent with lodging or dwelling units.

The City may not rely on labels provided by the applicant; it must evaluate how the project will function in practice. Approval of a project whose operational reality exceeds what is permitted by zoning is legally impermissible.

## II. DE FACTO RESIDENTIAL OR HOTEL USE WITHOUT REQUIRED ENTITLEMENTS

Absent enforceable conditions, the proposed overnight units enable de facto residential or hotel use without the entitlements required under HBMC Title 21.

The application materials fail to impose enforceable restrictions on:

- Length and frequency of stay
- Occupancy limits
- Kitchen facilities and independent living features
- Rental, leasing, or marketing practices

Without such restrictions, the project exceeds what may be approved through a Conditional Use Permit alone and would require additional land use approvals, including rezoning or hotel-specific entitlements. Approval without such analysis is unsupported by substantial evidence.

## III. LOSS OF EXISTING RECREATIONAL FACILITIES AND AMENITIES

The project proposes the removal of four existing tennis courts, with no replacement courts proposed. These courts represent an existing recreational use and amenity that serves both club members and the broader recreational fabric of the City.

Elimination of these facilities constitutes:

- A reduction in recreational services
- A loss of membership benefits for tennis and pickleball players
- Potential economic harm to the existing club, as membership retention and revenue depend on maintaining these amenities

HBMC requires that CUP approvals maintain compatibility with existing uses and not diminish established community resources. Removing courts without replacement or mitigation constitutes a legally insufficient finding.

### III-A. ECONOMIC AND COMMUNITY IMPACT OF MEMBER LOSS

The removal of courts and reconfiguration of facilities will cause many current club members to cancel memberships and relocate to clubs in Newport Beach, Long Beach, Seal Beach, and other surrounding areas, resulting in:

- Direct economic harm to the Huntington Club due to loss of membership revenue
- Reduction in local recreational opportunities for Huntington Beach residents
- Potential regional impacts as displaced members join neighboring clubs, shifting traffic and land-use burdens

The City must consider these economic and community impacts under CEQA and HBMC Title 21 when evaluating CUP findings.

### III-B. COMMUNITY AND CHARITABLE IMPACT

The Huntington Club supports multiple charitable events, including the annual “Serve It Up for the Troops” tennis, pickleball, and golf tournament. The club is the single largest fundraiser for this organization.

Removal of courts and disruption of the existing recreational infrastructure threatens:

- The continuity of these charitable events
- The club’s ability to serve the community and nonprofit organizations
- Huntington Beach’s reputation and access to recreational resources for the public

These impacts must be considered under CEQA as social and economic effects, and under HBMC Title 21 when evaluating CUP findings regarding compatibility and public benefit.

### IV. IMPROPER RELIANCE ON A CEQA CATEGORICAL EXEMPTION

The City’s reliance on a CEQA categorical exemption is legally improper.

Introduction of overnight lodging and removal of existing recreational facilities constitutes:

- Material intensification and change of use
- Reasonable possibility of significant environmental impacts, including traffic, parking, noise, lighting, utilities, and public safety

CEQA Guidelines prohibit categorical exemptions where unusual circumstances or intensification of use may result in significant environmental effects. The City may not segment the project to avoid proper review.

### V. COASTAL ACT CONSISTENCY CONCERNS

Although in the non-appealable area of the Coastal Zone, the City must ensure consistency with Coastal Act policies regarding:

- Visitor-serving recreational uses
- Protection of public access and recreational resources
- Avoiding incremental privatization of coastal land

Approval of quasi-residential or hotel-like lodging without proper classification, findings, or environmental review undermines these policies.

## VI. FAILURE TO MAKE REQUIRED FINDINGS

To lawfully approve this project, the City must make explicit, evidence-based findings that:

1. Lodging is truly accessory and incidental to the primary recreational use
2. The project does not function as residential or hotel use
3. The scale and intensity are compatible with surrounding zoning
4. CEQA exemption fully applies notwithstanding overnight occupancy
5. The project does not increase intensity of use beyond what is permitted

Absent substantial evidence supporting each finding, approval would be arbitrary, capricious, and contrary to law.

## VII. SPECULATIVE / UNPROVEN REVENUE STREAM

The proposed lodging and bungalow units constitute a speculative, untested revenue source. There is no demonstrated demand, and the potential loss of current members further undermines the claimed financial rationale. Approval based on this untested revenue, without mitigation for displaced membership and loss of recreational services, fails the substantial evidence requirement and cannot justify CUP approval or CEQA exemption.

## VIII. NECESSARY CONDITIONS IF APPROVAL IS CONSIDERED

If the City considers approval notwithstanding the above concerns, it must impose clear, enforceable conditions, including:

- Strict maximum length-of-stay limits
- Prohibition of full kitchens or independent living facilities
- Absolute prohibition on leasing, renting, or advertising
- Occupancy caps
- Restriction to club members only
- Annual compliance reporting
- Express revocation authority for violations

Failure to impose such conditions further strengthens legal vulnerability.

## IX. PRESERVATION OF RIGHTS

All objections raised herein are intended to preserve all administrative, appellate,

and judicial remedies under state and local law. The City is respectfully requested to include this correspondence in the administrative record and respond with specific findings addressing each concern.

This letter is provided to document the status of the proposed approvals and is not intended as a waiver of any rights under HBMC, CEQA, the Coastal Act, or applicable law.

Respectfully submitted,

James and Elizabeth Hartman  
THC Members/ Townlot Property owners/Edison High School, Class of 1983  
Huntington Beach, California

Sent from my iPhone misspellings and all...

Elizabeth Hartman

t: 770-344-9236

Sent from my iPhone misspellings and all...

## Switzer, Donna

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**From:** Michael Gates <michaelgates44@gmail.com>  
**Sent:** Thursday, January 22, 2026 8:35 AM  
**To:** supplementalcomm@surfcity-hb.org

You don't often get email from michaelgates44@gmail.com. [Learn why this is important](#)

Dear Pat & Butch

I am writing as a friend and as a deeply concerned member of The Huntington Club community to express my unequivocal opposition to the proposed construction of bungalows on club property.

This proposal is profoundly misguided. The Huntington Club is not excess land waiting to be carved up—it is a long-standing recreational institution that serves its members and the Huntington Beach community every single day. Tennis and pickleball are not peripheral amenities; they are the core purpose of the club, supporting daily play, youth instruction, leagues, and sanctioned tournaments that bring meaningful activity and economic benefit to the city.

The bungalow plan would eliminate a significant number of existing courts and usable recreational space, effectively crippling the club's ability to function. This is not a minor adjustment or "reimagining" of the property—it is a direct assault on the very programs and activities that define The Huntington Club. The loss of courts would immediately disrupt established programs, displace players, and make it impossible to host tournaments or organized events that rely on proper court capacity and layout.

Even more troubling is the inclusion of a new street running directly through the middle of the property. This decision defies common sense. It would further destroy courts, fracture the club's footprint, compromise safety, and permanently degrade the continuity and usability of the remaining facilities. The cumulative impact of these changes would fundamentally and irreversibly alter the club's character, turning a cohesive recreational space into a fragmented and diminished shadow of what it is today.

I strongly urge the City Council to reject this proposal outright. Any development plan that sacrifices an established recreational asset in favor of short-sighted construction runs counter to the city's stated commitment to healthy living, community engagement, and quality of life. The Huntington Club should be protected and preserved—not dismantled piece by piece.

This community deserves better. I expect the City Council to recognize the damage this proposal would cause and to take decisive action to stop it. I am more than willing to engage further, but only toward solutions that preserve the club's core community mission and its facilities.

Sincerely,

Michael Gates

Business Owner

**From:** [Elizabeth Hartman](#)  
**To:** [CITY COUNCIL \(INCL. CMO STAFF\)](#); [city.manager@surfcity-hb.org](mailto:city.manager@surfcity-hb.org); [Hyland, Connor](#); [supplementalcomm@surfcity-hb.org](mailto:supplementalcomm@surfcity-hb.org); [SouthCoast@coastal.ca.gov](mailto:SouthCoast@coastal.ca.gov); [Planning Commission](#); [i.villasenor@surfcity-hb.org](mailto:i.villasenor@surfcity-hb.org)  
**Subject:** Formal Record Request & Disclosure – Huntington Club Agenda item Conditional Use Permit No. 22-011 / Coastal Development Permit No. 22-009 Huntington Club Remodel and Bungalows – 6501 Palm Avenue Planning Commission Hearing: January 27, 2026  
**Date:** Friday, January 23, 2026 2:30:13 PM

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To: City Clerk, City Attorney, Members of the Huntington Beach City Council,

This email is submitted in advance of the upcoming City Council vote regarding matters involving or affecting the Huntington Club. It is intended to create a clear, formal record for the public and the Council. The submission combines a public comment-style disclosure request with a California Public Records Act (CPRA) request, and is made in a good-faith effort to ensure transparency, compliance with state and local law, and preservation of public confidence in Council decision-making.

#### Public Comment / Disclosure Request

Pursuant to the California Political Reform Act (Gov. Code §§ 81000–91014), including §§ 87100, 87103, and 87200, as well as applicable Huntington Beach City Charter and Municipal Code provisions regarding Council conduct, conflicts of interest, and disclosure, I respectfully request clarification and recordation on the following:

1. Whether any sitting City Council Member currently holds, or has within the past two years held, a membership at the Huntington Club.
2. If so, whether such memberships were obtained at full market rates, including initiation fees and dues, and whether any discounts, waivers, complimentary services, or other benefits were allegedly or potentially provided, to the extent any exist.
3. Whether any such relationships, to the extent they exist, have been properly disclosed on Form 700 filings and whether a conflict-of-interest analysis has been conducted to determine whether any Council Member with such a relationship may legally participate in this vote.
4. Whether any Council Member's participation could reasonably foresee, allegedly or potentially, future financial benefits, privileges, or other emoluments arising from the Huntington Club or related entities.
5. Confirmation that appropriate recusals will be made, consistent with state law, FPPC regulations, and Huntington Beach Municipal Code / City Charter provisions, should any current or foreseeable interests exist.

This request is not an allegation of wrongdoing, but a good-faith effort to ensure compliance with California law, preserve the integrity of the Council's decision-making, and maintain public confidence. I respectfully request that any response be addressed on the record prior to the vote.

#### CPRA Companion Request

In addition, pursuant to the California Public Records Act (Gov. Code §§ 6250–6276.48), I request access to the following public records, to the extent they exist and are maintained by the City:

1. Form 700 Statements of Economic Interests for all current City Council Members, including any reporting of Huntington Club memberships, dues, or other benefits.
2. Internal communications, memoranda, or correspondence documenting conflict-of-interest determinations, recusals, or analyses regarding Council Members' potential financial interests, memberships, or benefits related to the Huntington Club, consistent with Gov. Code §§ 87100, 87103 and FPPC Regulations 18700 and 18702.5.
3. Any records regarding the reasonable foreseeability of future benefits, privileges, or emoluments to any

Council Member arising from the Huntington Club or related entities in connection with this agenda item, consistent with state law and City Charter / Municipal Code obligations.

I respectfully request acknowledgment of receipt within 10 calendar days, consistent with Gov. Code § 6253(c), and a reasonable estimate for providing these records. If any portion of the records is withheld, please cite the specific statutory exemption relied upon. I request that any responsive records be provided electronically, if available, and included in the public record for this agenda item.

Thank you for your attention to this request. Please contact me if clarification is required.

Respectfully,  
Elizabeth Hartman

t: 770-344-9236

Sent from my iPhone misspellings and all...

**From:** [Suzanne Devries](#)  
**To:** [supplementalcomm@surfcity-hb.org](mailto:supplementalcomm@surfcity-hb.org)  
**Subject:** Rezoning and Modifications of The Huntington Club  
**Date:** Monday, January 26, 2026 2:50:28 PM

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To the Planning Commission of Huntington Beach:

I inadvertently sent this letter to the City Council Members by mistake so I am now forwarding it to you, the Planning Commission.

The prospective project at The Huntington Club will be reviewed by the commission tomorrow. As a member of the community and as a landowner bordering The Huntington Club golf course, I have several concerns about the plan.

The landowner of The Huntington Club on Palm Street is currently planning to convert The Huntington Club from recreational zoning to a commercial use, including hotel and short-term stays. This proposal carries long-term and potentially irreversible consequences that may not be fully considered within the scope of a zoning change. Once recreational land is converted, the City permanently loses the benefits it provides—benefits that Huntington Beach is not currently equipped to replace.

Here are some of my immediate concerns:

#### 1. Loss of Recreational Functionality

Although The Huntington Club is private, its purpose is centered on physical activity—golf, tennis, pickleball, and fitness. Under the current plan, approximately half of the tennis and pickleball courts would become unusable. Additionally, the remaining courts cannot be lit at night due to proximity to neighboring homes, further reducing access.

#### 2. Elimination of Charitable and Community Events

The reduced infrastructure would prevent the club from hosting charitable and large-scale athletic events. For example, “Serve It Up for the Troops,” a longstanding event held at this location for over 15 years that supports military families, would no longer be viable.

#### 3. Long-Term Zoning Precedent

The site is currently zoned for recreation. Allowing bungalows for hotel use sets a clear precedent. The next logical step would be future requests to convert remaining recreational assets—such as courts—into housing or additional commercial use. Once zoning is changed, it will not revert.

## 5. Questionable Demand for Bungalow Lodging

The proposed bungalows warrant further study regarding realistic occupancy. While the City reports 11–12 million visitors annually, it is unlikely that a quiet residential Seacliff neighborhood will generate sufficient demand for this type of lodging. Existing hotels along PCH already struggle to maintain full occupancy year-round and offer similar wedding and event venues.

## 6. Broader Policy Implications

Finally, what precedent does this rezoning set for Huntington Beach? How does it align with the City's recreational master planning? Once this change is approved, what prevents similar requests from other recreational sites, and how does that serve the long-term interests of the City?

While our home backs up to the club and we enjoy hearing members using the facilities, this concern is about thoughtful planning and long-term community benefit. The plan for Huntington Beach is to maintain as much beautiful open space as possible. Let's not reduce that which is so scarce to begin with.

This proposal, as currently envisioned, introduces significant unintended consequences for club members and the City. I respectfully urge the Council to consider a more refined, scaled-back approach and to allow time for open dialogue among the landowner, management company, club members, and the City. These members are the economic drivers of the club and contributors to City tax revenue.

Please do not rush a decision of this magnitude. Thank you for your commitment to the health, well-being, and long-term interests of Huntington Beach residents.

Sincerely,

Suzanne DeVries  
6802 Silver Beach Cir  
Huntington Beach  
714.390.6175

## Switzer, Donna

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**From:** Elizabeth Hartman <hartmanhouseoc@gmail.com>  
**Sent:** Monday, January 26, 2026 4:44 PM  
**To:** supplementalcomm@surfcity-hb.org  
**Cc:** Hyland, Connor; Planning Commission; CITY COUNCIL (INCL. CMO STAFF); Permit Center; SouthCoast@coastal.ca.gov; Cortez, Joanna; Barnes, Lisa Lane  
**Subject:** Fwd:  
**Attachments:** PETITION CERTIFICATION .pdf; The Issue.pdf; Signature Summary.pdf; petition\_signatures\_jobs\_490986654\_20260126232929.csv

You don't often get email from hartmanhouseoc@gmail.com. [Learn why this is important](#)

Begin forwarded message:

**From:** Elizabeth Hartman <hartmanhouseoc@gmail.com>  
**Date:** January 26, 2026 at 4:19:53 PM PST  
**To:** Elizabeth Hartman <hartmanhouseoc@gmail.com>

Good afternoon,

This email serves as the formal submission and notice of a petition and supporting signatures regarding Agenda Item 26-039, Conditional Use Permit No. 22-011 and Coastal Development Permit No. 22-009, concerning the proposed Huntington Club Bungalows and Lofts project.

Submission Details (For the Record):

- The attached petition has received over 500 signatures within a 48-hour period, representing a substantial portion of The Huntington Club membership, as well as residents and stakeholders of the City of Huntington Beach.
- The petition and signatures were emailed to the City and Planning Commission prior to 5:00 PM today.
- Physical copies of the petition will be hand-delivered to the City Clerk at the Planning Commission dais, with additional copies provided to Planning Commission members and City planning staff.
- This submission is intended to ensure the petition and all supporting materials are entered into the official administrative record for the January 27, 2026 Planning Commission meeting.

Purpose of Submission:

The petition respectfully requests denial of, or further lawful review of, the proposed

project as currently presented, based on concerns related to:

- The scope and legality of approval under a Conditional Use Permit;
- Applicability of the CEQA Class 32 exemption;
- Consistency with Open Space–Recreation zoning;
- Equal treatment under local short-term rental regulations;
- Preservation of existing recreational facilities, including tennis courts; and
- The need for full disclosure of reasonably foreseeable future development.

This submission is not intended to be adversarial, but rather to assist the City, the Planning Commission, and reviewing agencies in ensuring that all decisions are made with a complete and accurate record, in compliance with applicable municipal, state, and coastal laws.

Please confirm receipt of this submission and inclusion in the record at your convenience.

Thank you for your time, service, and commitment to the City of Huntington Beach.

Respectfully submitted,  
Elizabeth Hartman

t: 770-344-9236

Sent from my iPhone misspellings and all...

## Switzer, Donna

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**From:** Elizabeth Hartman <hartmanhouseoc@gmail.com>  
**Sent:** Monday, January 26, 2026 5:09 PM  
**To:** supplementalcomm@surfcity-hb.org  
**Cc:** Hyland, Connor; Planning Commission; CITY COUNCIL (INCL. CMO STAFF); Permit Center; SouthCoast@coastal.ca.gov; Cortez, Joanna; Barnes, Lisa Lane  
**Subject:** Official Record Submission: Agenda Item 26-039, Conditional Use Permit No. 22-011 and Coastal Development Permit No. 22-009  
**Attachments:** PETITION CERTIFICATION .pdf; The Issue.pdf; Signature Summary.pdf; petition\_signatures\_jobs\_490986654\_20260126232929.csv

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- This submission is intended to ensure the petition and all supporting materials are entered into the official administrative record for the January 27, 2026 Planning Commission meeting.

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- Applicability of the CEQA Class 32 exemption;
- Consistency with Open Space-Recreation zoning;
- Equal treatment under local short-term rental regulations;
- Preservation of existing recreational facilities, including tennis courts; and
- The need for full disclosure of reasonably foreseeable future development.

This submission is not intended to be adversarial, but rather to assist the City, the Planning Commission, and reviewing agencies in ensuring that all decisions are made with a complete and accurate record, in compliance with applicable municipal, state, and coastal laws.

Please confirm receipt of this submission and inclusion in the record at your convenience.

Thank you for your time, service, and commitment to the City of Huntington Beach.

Respectfully submitted,

Elizabeth Hartman  
(770)344-9236

## CERTIFICATION OF PETITION AND SIGNATURES

Agenda Item 26-039

Conditional Use Permit No. 22-011 / Coastal  
Development Permit No. 22-009

Huntington Club – Bungalows & Lofts

I, Elizabeth Hartman , hereby certify the following:

1. The attached petition titled “Huntington Club Bungalows & Lofts – Petition to Deny or Require Further Lawful Review” was created and circulated via Change.org.
  2. As of Monday, January 26th at 5:00pm, the petition has received over 500 signatures within approximately 48 hours of publication.
  3. The attached signature list is a true and correct export of signatures obtained through Change.org and includes signer names, locations where provided, and timestamps.
  4. The petition and signatures are submitted for inclusion in the official administrative record for the January 27, 2026 Planning Commission hearing.
-

5. This submission is made to preserve procedural rights, ensure full disclosure, and assist the City in complying with applicable zoning, CEQA, Coastal Act, and municipal requirements.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on: January 26th, 2026

At: Huntington Beach, California

Signature: 

Name: Elizabeth Hartman

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## **The Issue**

**To:**

**The City of Huntington Beach  
City Council, Planning Commission, and City  
Attorney**

**Regarding:**

**Conditional Use Permit No. 22-011 / Coastal  
Development Permit No. 22-009  
Huntington Club – Bungalows & Lofts  
(Agenda Item 26-039)**

**We, the undersigned residents and  
stakeholders of the City of Huntington Beach,  
respectfully petition the City to deny or  
require further lawful review of the proposed  
Huntington Club Bungalows & Lofts project,  
as currently proposed, based on the following  
concerns:**

### **1. Improper Use of a Conditional Use Permit (CUP)**

**The project proposes four bungalows and two  
loft units intended for overnight stays of less  
than 30 days. This constitutes a lodging or  
quasi-hotel use, which is not a conditionally  
permitted use within the Open Space–  
Recreation (OS-PR) zoning district.**

**A Conditional Use Permit may not lawfully be  
used to authorize a new or intensified land  
use that exceeds the zoning code. Approval  
of paid overnight lodging through a CUP  
would exceed the City's administrative  
authority.**

### **2. CEQA Class 32 Exemption Is Legally Inapplicable**

**The City's reliance on a Class 32 (In-Fill)**

**CEQA exemption is inappropriate because:**

**The addition of overnight lodging materially  
intensifies the use of the property**

**The removal of four tennis courts alters the  
functional character of the site**

**Proximity to residential uses creates potential  
environmental impacts**

**The project may involve unusual  
circumstances under CEQA Guidelines**

**§15300.2**

**CEQA requires evaluation of the whole of the**

action, based on how the project will actually operate, not how it is characterized.

### **3. Unequal Treatment Under Local Short-Term Rental Law**

Huntington Beach Municipal Code §5.120 prohibits residents from renting homes for periods of less than 30 days, except under narrow, express authorization.

Allowing a private landowner or club to operate paid overnight accommodations under a CUP—while residents are prohibited from similar activity—creates unequal treatment under the law and undermines consistent enforcement of municipal regulations.

### **4. Risk of Ultra Vires Approval**

If the bungalows and lofts are constructed and monetized as paid overnight accommodations, approval through a CUP would constitute an ultra vires act—an action taken beyond the City's legal authority—exposing the City to legal and CEQA challenge.

### **PETITION REQUEST**

We respectfully request that the City of Huntington Beach:

Deny the current CUP and CEQA exemption for the bungalows and lofts; or

Require the applicant to pursue the appropriate zoning amendment or legislative entitlement; and

Ensure any future consideration complies fully with CEQA, zoning law, and equal treatment principles.

This petition is submitted to preserve the integrity of the City's land use process, protect lawful zoning authority, and ensure fair and consistent application of municipal law.

## SIGNATURE SUMMARY

Agenda Item 26-039

Conditional Use Permit No. 22-011 / Coastal  
Development Permit No. 22-009

Huntington Club – Bungalows & Lofts

- Petition platform: Change.org
- Petition launch date: January 24, 2026
- Signature count as of: January 26, 2026, at 5 PM
- Total signatures: 500+
- Timeframe of collection: Approximately 48 hours
- General signer description:  
Signatures include Huntington Club members,  
Huntington Beach residents, and other community  
stakeholders, as identified by self-reported  
information at the time of signing.

This summary is provided for administrative clarity only. Individual signatures, timestamps, and locations (where provided) are included in the attached signature list.

Name	City	State	Postal Code	Country	Signed On
Elizabeth Hartman				United States	1/24/2026
James Hartman	Huntington Beach	CA	92648	United States	1/24/2026
Lindsay Kimmes	Huntington Beach	CA	92648	United States	1/24/2026
Kevin Todd	Huntington Beach	CA	92646	United States	1/24/2026
Richard cockshott	Huntington Beach	CA	92648	United States	1/24/2026
Carl Goltermann	Huntington Beach	CA	92647	United States	1/24/2026
Ida shu	Huntington Beach	CA	92648	United States	1/24/2026
Liz Reichert	Huntington Beach	CA	92648	United States	1/24/2026
Ana Goltermann	Huntington Beach	CA	92647	United States	1/24/2026
Brenda danielson	Huntington Beach	CA	92648	United States	1/24/2026
Jason Tuttle	Huntington Beach	CA	92647	United States	1/24/2026
Race Parmenter	Huntington Beach	CA	92646	United States	1/24/2026
Tiffany Colf	Huntington Beach	CA	92647	United States	1/24/2026
James Shih	Huntington Beach	CA	92648	United States	1/24/2026
Janna McConnell	Huntington Beach	CA	92648	United States	1/24/2026
Shelby kluewer	Huntington Beach	CA	92646	United States	1/24/2026
Frank Andruss	Huntington Beach	CA	92648	United States	1/24/2026
Tara Cockshott	Huntington Beach	CA	92648	United States	1/24/2026
Stephanie buccella	Huntington Beach	CA	92648	United States	1/24/2026
Thomas mcdaniel	Huntington Beach	CA	92648	United States	1/24/2026
Tiffany Perrucci	Huntington Beach	CA	92648	United States	1/24/2026
lauren prelesnik	Huntington Beach	CA	92648	United States	1/24/2026
Beau Janzen	Huntington Beach	CA	92646	United States	1/24/2026
Elizabeth Janzen	Huntington Beach	CA	92646	United States	1/24/2026
Angie karahalios	Huntington Beach	CA	92648	United States	1/24/2026
Robert Kelly	Huntington Beach	CA	92648	United States	1/24/2026
Caleb Prelesnik	Huntington Beach	CA	92646	United States	1/24/2026
Virginia Gross	Huntington Beach	CA	92648	United States	1/24/2026
Douglas Warren	Huntington Beach	CA	92648	United States	1/24/2026
Raphael Bernard	Costa Mesa	CA	92626	United States	1/24/2026
Raelynn Garrett	Huntington Beach	CA	92648	United States	1/24/2026
Susan Fitzhugh	Huntington Beach	CA	92648	United States	1/24/2026
anthony andrews	Huntington Beach	CA	92648	United States	1/24/2026
Calum Colbert	Huntington Beach	CA	92648	United States	1/24/2026
Jon Seretan	Long Beach	CA	90814	United States	1/24/2026
Emma Fitzhugh	Huntington Beach	CA	92648	United States	1/24/2026
Natalie Crowell	Huntington Beach	CA	92648-554	United States	1/24/2026
Robert Casares	Huntington Beach	CA	92648	United States	1/24/2026
Alex Baron	Huntington Beach	CA	92647	United States	1/24/2026
Tonianne Southron	Seal Beach	CA	90740	United States	1/24/2026
Kathy Kelly	Huntington Beach	CA	92648	United States	1/24/2026
Dawne Moore	Huntington Beach	CA	92648	United States	1/24/2026
Suzanne DeVries	Huntington Beach	CA	92648	United States	1/24/2026

Patrick Urian	Huntington Beach	CA	92648	United States	1/24/2026
Carmen Johnson	Huntington Beach	CA	92648	United States	1/24/2026
Joan Mayeaux	Huntington Beach	CA	92647	United States	1/24/2026
Chris Hutnick	Huntington Beach	CA	92648	United States	1/24/2026
Donavan Mayes	Huntington Beach	CA	92648	United States	1/24/2026
Charlie O'Brien	Huntington Beach	CA	92648	United States	1/24/2026
Nancy Stephens	Huntington Beach	CA	92648	United States	1/24/2026
Bernd Haupt	Huntington Beach	CA	92648	United States	1/24/2026
Robin Slome	Huntington Beach	CA	92648	United States	1/24/2026
Robin McManus	Huntington Beach	CA	92649	United States	1/24/2026
Brad Seckner	Santa Monica	CA	90402	United States	1/24/2026
Barbara Sladeck	Huntington Beach	CA	92646	United States	1/24/2026
Gloria Schmidt	Huntington Beach	CA	92649	United States	1/24/2026
Brian rosenblatt	Huntington Beach	CA	92649	United States	1/24/2026
Donna Traversi	Huntington Beach	CA	92648	United States	1/24/2026
Michael Wilson	Huntington Beach	CA	92648	United States	1/24/2026
Katie Makros	Huntington Beach	CA	92648	United States	1/24/2026
Theresa DuBourdieu	Huntington Beach	CA	92648	United States	1/24/2026
Kelly Hodge	Huntington Beach	CA	92648	United States	1/24/2026
Katherine Buerkle	Huntington Beach	CA	92648	United States	1/24/2026
Sarah King	Huntington Beach	CA	92648	United States	1/24/2026
Pratima karia	Huntington Beach	CA	92648	United States	1/24/2026
Sam Fullerton	Huntington Beach	CA	92648	United States	1/24/2026
Jacqueline Luther	Huntington Beach	CA	92648	United States	1/24/2026
Claudia Fernandez-Shaw	Huntington Beach	CA	92648	United States	1/24/2026
Jennifer Urian	Huntington Beach	CA	92648	United States	1/24/2026
Samantha Bloom	Huntington Beach	CA	92648	United States	1/24/2026
Dana bennett	Huntington Beach	CA	92648	United States	1/24/2026
Karen Brink	Huntington Beach	CA	92649	United States	1/24/2026
Brande Hune	Huntington Beach	CA	92648	United States	1/24/2026
Allyson Rassouli	Huntington Beach	CA	92648	United States	1/24/2026
Rochelle Ruth	Huntington Beach	CA	92646	United States	1/24/2026
Emile Wakim	Huntington Beach	CA	92648	United States	1/24/2026
Rosalinda fazio	Huntington Beach	CA	92648	United States	1/24/2026
Doria Merical	Huntington Beach	CA	92649	United States	1/24/2026
Taylor Hardin	Huntington Beach	CA	92647	United States	1/24/2026
Michael Schaffner	Huntington Beach	CA	92649	United States	1/24/2026
Heather Velastegui	Huntington Beach	CA	92646	United States	1/24/2026
Jennifer Schaumburg	Huntington Beach	CA	92646	United States	1/24/2026
Curtis Ong	Huntington Beach	CA	92648	United States	1/24/2026
Jamie Coker-Robertson	Fountain Valley	CA	92708	United States	1/24/2026
Christine blair	Huntington Beach	CA	92646	United States	1/24/2026
Elisabeth Day	Huntington Beach	CA	92648	United States	1/24/2026
Rossedy Anderson	Huntington Beach	CA	92646	United States	1/24/2026

Linda simonian	Huntington Beach	CA	92647	United States	1/24/2026
Jennifer Johnson	Huntington Beach	CA	92646	United States	1/24/2026
Trena Ault	Huntington Beach	CA	92646	United States	1/24/2026
Albert Lin	Newport Beach	CA	92663	United States	1/24/2026
Tracy Boswell	Huntington Beach	CA	92648	United States	1/24/2026
Janel Yoshida	Huntington Beach	CA	92648	United States	1/24/2026
Amy DeNardo	Huntington Beach	CA	92648	United States	1/24/2026
Andrew Marsoun	Huntington Beach	CA	92648	United States	1/24/2026
Linda Spengler	Huntington Beach	CA	92648	United States	1/24/2026
Doug Luther	Huntington Beach	CA	92648	United States	1/24/2026
Hanh Seckner	Huntington Beach	CA	92648	United States	1/24/2026
Cinthia Perez	Huntington Beach	CA	92648	United States	1/24/2026
Paul Hicks	Huntington Beach	CA	92648	United States	1/24/2026
Kelly Venezia	Huntington Beach	CA	92647	United States	1/24/2026
Michaela Fazio	Huntington Beach	CA	92648	United States	1/24/2026
Allyson Moser	Huntington Beach	CA	92648	United States	1/24/2026
Loreen Attridge	Huntington Beach	CA	92648	United States	1/24/2026
Jade Hendricks	Huntington Beach	CA	92648	United States	1/24/2026
Vanessa Benson	Huntington Beach	CA	92648	United States	1/24/2026
Rita Sidrak	Huntington Beach	CA	92648	United States	1/24/2026
Randy Ellison	Huntington Beach	CA	92649	United States	1/24/2026
Margo Ferris	Huntington Beach	CA	92646	United States	1/24/2026
Mark Ault	Huntington Beach	CA	92646	United States	1/24/2026
Michaela Vitrano	Huntington Beach	CA	92649	United States	1/24/2026
Audrey Hartman	Huntington Beach	CA	92649	United States	1/24/2026
Nicole trapp	Huntington Beach	CA	92648	United States	1/24/2026
Gigi kramer	Huntington Beach	CA	92646	United States	1/24/2026
Tara Coker	Huntington Beach	CA	92646	United States	1/24/2026
Dennis Donsker	Newport Beach	CA	92663	United States	1/24/2026
James Templin	Huntington Beach	CA	92648	United States	1/24/2026
Debbie De La Cruz	Huntington Beach	CA	92647	United States	1/24/2026
Jackie Ferlita	Huntington Beach	CA	92648	United States	1/24/2026
Steven Ralls	Huntington Beach	CA	92648	United States	1/24/2026
Nancy Shih	Huntington Beach	CA	92648	United States	1/24/2026
Meredyth Serrecchia	Huntington Beach	CA	92649	United States	1/24/2026
Ayden Colbert	Huntington Beach	CA	92648	United States	1/24/2026
John lane	Huntington Beach	CA	90742	United States	1/24/2026
Ashley Trieb	Huntington Beach	CA	92648	United States	1/24/2026
Maryann Jensen	Huntington Beach	CA	92648	United States	1/24/2026
Robin Brunner	Huntington Beach	CA	92648	United States	1/24/2026
Matthew Benson	Huntington Beach	CA	92648	United States	1/24/2026
Dion Trieb	Huntington Beach	CA	92648	United States	1/24/2026
Niva Patel	Huntington Beach	CA	92646	United States	1/24/2026
Diane Passaquindici	Huntington Beach	CA	92648	United States	1/24/2026

Nora Fernandez	Huntington Beach	CA	92648	United States	1/24/2026
James Jensen	Huntington Beach	CA	92648	United States	1/24/2026
Karen Warren	Huntington Beach	CA	92648	United States	1/24/2026
Cathy Campbell	Huntington Beach	CA	92648	United States	1/24/2026
Ken Stockman	Huntington Beach	CA	92648	United States	1/24/2026
Sean Moore	Huntington Beach	CA	92647	United States	1/24/2026
Dave Kerr	Huntington Beach	CA	92646	United States	1/24/2026
George Woodley	Huntington Beach	CA	92648	United States	1/24/2026
Laura knight	Huntington Beach	CA	92648	United States	1/24/2026
Tracie French	Huntington Beach	CA	92648	United States	1/24/2026
Sterling Lapham	Huntington Beach	CA	92649	United States	1/24/2026
Clint Gerlach	Huntington Beach	CA	92648	United States	1/24/2026
David Luther	Huntington Beach	CA	92646	United States	1/24/2026
Steven Sturm	Huntington Beach	CA	92648	United States	1/24/2026
Karen Sturm	Huntington Beach	CA	92648	United States	1/24/2026
Brett Duff	Huntington Beach	CA	92646	United States	1/24/2026
Chris Crosswell	Huntington Beach	CA	92648	United States	1/24/2026
Lesley Malone	Huntington Beach	CA	92646	United States	1/24/2026
Cheryl Gates	Huntington Beach	CA	92648	United States	1/24/2026
Mike Frayer	Huntington Beach	CA	92647	United States	1/24/2026
Karen Guthorn	Huntington Beach	CA	92648	United States	1/24/2026
Angelique Ouaknine	Huntington Beach	CA	92649	United States	1/24/2026
Calder McNab	Huntington Beach	CA	92648	United States	1/24/2026
Cecilia Hicks	Huntington Beach	CA	92648	United States	1/24/2026
Teri Springer	Huntington Beach	CA	92648	United States	1/24/2026
Elysia Weiner	Huntington Beach	CA	92646	United States	1/24/2026
Carol CooperYudin	Huntington Beach	CA	92647	United States	1/24/2026
Dorothy Weiner	Huntington Beach	CA	92646	United States	1/24/2026
Taylor gates	Huntington Beach	CA	92648	United States	1/24/2026
Jennifer Schaffner	Huntington Beach	CA	92649	United States	1/24/2026
Ben Tilton	Huntington Beach	CA	92646	United States	1/24/2026
Maxwell Upp	Laguna Niguel	CA	92677	United States	1/24/2026
Ed Breunig	Huntington Beach	CA	92648	United States	1/24/2026
Michelle Bachand	Huntington Beach	CA	92648	United States	1/24/2026
Jannette Martes	Lakewood	CA	90712	United States	1/24/2026
Robert Rose	Huntington Beach	CA	92648	United States	1/24/2026
Suzanne valker	Huntington Beach	CA	92648	United States	1/24/2026
Eric Reichert	Huntington Beach	CA	92648	United States	1/24/2026
Scott Clegg	Huntington Beach	CA	92648	United States	1/24/2026
Josephine Garrett	Huntington Beach	CA	92648	United States	1/24/2026
jeneane Tripoli	Huntington Beach	CA	92648	United States	1/24/2026
John DeGuide	Huntington Beach	CA	92648	United States	1/24/2026
Allen Hampton	Huntington Beach	CA	92648	United States	1/24/2026
Tatyana Bukrinsky	Huntington Beach	CA	92649	United States	1/24/2026

Mariam Arsala	Anaheim	CA	92804	United States	1/24/2026
Brent Kosick	Huntington Beach	CA	92646	United States	1/24/2026
Sharon Maines	Huntington Beach	CA	92648	United States	1/24/2026
Jeffrey Teng	Huntington Beach	CA	92648	United States	1/24/2026
Greg Berger	Huntington Beach	CA	92646	United States	1/24/2026
Judy Jones	Huntington Beach	CA	92648	United States	1/24/2026
Marian McClellan	Huntington Beach	CA	92648	United States	1/24/2026
Susan DeGuide	Huntington Beach	CA	92648	United States	1/24/2026
Joseph Schacatano	Huntington Beach	CA	92649	United States	1/24/2026
James Romanowski	Huntington Beach	CA	92648	United States	1/24/2026
Frank Carroll	Huntington Beach	CA	92648	United States	1/25/2026
Violet Cueva-Unseld	Huntington Beach	CA	92648	United States	1/25/2026
Diana Davide	Huntington Beach	CA	92648	United States	1/25/2026
Tim Maurer	Anaheim	CA	92808	United States	1/25/2026
Michelle Strollo	Huntington Beach	CA	92648	United States	1/25/2026
John Ridgway	Huntington Beach	CA	92648	United States	1/25/2026
Joseph Garrett	Huntington Beach	CA	92648	United States	1/25/2026
Dat Do	Huntington Beach	CA	92648	United States	1/25/2026
Diane Buccella	Huntington Beach	CA	92649	United States	1/25/2026
Carlos Ortiz	Huntington Beach	CA	92648	United States	1/25/2026
LINDY Webb	Huntington Beach	CA	92648	United States	1/25/2026
Mary MacKenzie	Huntington Beach	CA	92648	United States	1/25/2026
Mary Lou Martin	Long Beach	CA	90803	United States	1/25/2026
Rudi Riegler	Huntington Beach	CA	92647	United States	1/25/2026
Kevin Dunham	Huntington Beach	CA	92649	United States	1/25/2026
terry hammer	Huntington Beach	CA	92648	United States	1/25/2026
Vona Breunig	Huntington Beach	CA	92648	United States	1/25/2026
Troy Coker	Huntington Beach	CA	92646	United States	1/25/2026
Paul Rubio	Huntington Beach	CA	92649	United States	1/25/2026
Susan Ridgway	Huntington Beach	CA	92648	United States	1/25/2026
Carla Rose	Huntington Beach	CA	92648	United States	1/25/2026
sharon pitchford	Huntington Beach	CA	92646	United States	1/25/2026
Patti Gasparian	Huntington Beach	CA	92648	United States	1/25/2026
Lynn Haye	Huntington Beach	CA	92648	United States	1/25/2026
Tyler straub	Huntington Beach	CA	92648	United States	1/25/2026
Teresa Campbell	Huntington Beach	CA	92648	United States	1/25/2026
Matthew Shackelford	Huntington Beach	CA	92648	United States	1/25/2026
Neda Zargar	Irvine	CA	92614	United States	1/25/2026
Albert Gasparian	Huntington Beach	CA	92648	United States	1/25/2026
Mary Amen	Huntington Beach	CA	92649	United States	1/25/2026
Alton Foran	Huntington Beach	CA	92648	United States	1/25/2026
mah mehr	Laguna Beach	CA	92651	United States	1/25/2026
Sonu S	Fullerton	CA	92832	United States	1/25/2026
Caryl Deovlet	Huntington Beach	CA	92648	United States	1/25/2026

Behnam Razmjooei	Irvine	CA	92618	United States	1/25/2026
Tim groff	Huntington Beach	CA	92648	United States	1/25/2026
aubrey hernandez	Los Angeles	CA	90043	United States	1/25/2026
Erin nichols	Huntington Beach	CA	92648	United States	1/25/2026
Tony SWANSON	Huntington Beach	CA	92648	United States	1/25/2026
natalie mcdaniel	Huntington Beach	CA	92648	United States	1/25/2026
Kristen Shearer	Huntington Beach	CA	92647	United States	1/25/2026
StephaniE Gledhill	Huntington Beach	CA	92648	United States	1/25/2026
Claire Au	Huntington Beach	CA	92648	United States	1/25/2026
Shadi H	Costa Mesa paouleri	CA	92626	United States	1/25/2026
Nooshin Neshat Effatian				United States	1/25/2026
Eveline Gani	Huntington Beach	CA	92649	United States	1/25/2026
Dan Blair	Huntington Beach	CA	92646	United States	1/25/2026
Subianto Gani	Pontianak		78111	Indonesia	1/25/2026
Paul Wyrick	Huntington Beach	CA	92649	United States	1/25/2026
Sepanta Yousefian	Somerville	MA	2144	United States	1/25/2026
Roneisha Reynolds	Victorville	WA	92394	United States	1/25/2026
Narges Falahati	Lake Forest	CA	92630	United States	1/25/2026
marjan asvadi	Los Angeles	CA	90017	United States	1/25/2026
Jasmin Imani	Santa Ana	CA	92701	United States	1/25/2026
Lisa C Wellman	Huntington Beach	CA	92648	United States	1/25/2026
Gayle Haas	Cutchogue	NY	11935	United States	1/25/2026
Michelle Greenhaw	Huntington Beach	CA	92649	United States	1/25/2026
Melanie mousavi	Los Angeles	CA	90017	United States	1/25/2026
shabnam shahriari	Irvine	CA	92620	United States	1/25/2026
Farzin Bijani	Lake Forest	CA	92630	United States	1/25/2026
Lalitha Ananth	Huntington Beach	CA	92648	United States	1/25/2026
Alicia Logan	Huntington Beach	CA	92647	United States	1/25/2026
Ricky L				United States	1/25/2026
Mark Zamiska	Huntington Beach	CA	92646	United States	1/25/2026
John Bruce Corral	Huntington Beach	CA	92648	United States	1/25/2026
Kimo malie	Irvine	CA	92678	United States	1/25/2026
Vicki Davis	Huntington Beach	CA	92648	United States	1/25/2026
Melanie Champion	Huntington Beach	CA	92648	United States	1/25/2026
John dyer	Huntington Beach	CA	92648	United States	1/25/2026
ROGER McClellan	Huntington Beach	CA	92648	United States	1/25/2026
Theresa Scheffler	Los Angeles	CA	90068	United States	1/25/2026
Shabboo Karimi	Irvine	CA	92620	United States	1/25/2026
hong mei cui	Huntington Beach	CA	92648	United States	1/25/2026
Farin Baradaran	Aliso Viejo	CA	92656	United States	1/25/2026
rosemary torossian	Sherman Oaks	CA	91423	United States	1/25/2026
Shekoufeh Mohammadi	Canoga Park	CA	91303	United States	1/25/2026
Ava Moosavi	Irvine	CA	92620	United States	1/25/2026
Mojgan Noori	Dana Point	CA	92629	United States	1/25/2026

Jenny Freck	Huntington Beach	CA	92648	United States	1/25/2026
Maryam Mosafer	Corona del Mar	CA	92625	United States	1/25/2026
Mehrnaz Rassizadeh	Santa Ana	CA	92701	United States	1/25/2026
Eric Wiltfong	Huntington Beach	CA	92646	United States	1/25/2026
Vahid Zamiri	Encino	CA	91316	United States	1/25/2026
Mahan Khorramzad	Irvine	CA	92612	United States	1/25/2026
Tom Shibel	Huntington Beach	CA	92646	United States	1/25/2026
Sean V	Laguna Hills	CA	92653	United States	1/25/2026
Tristan Peimanzi	Riverside	CA	92503	United States	1/25/2026
Zahra Amirloo	Anaheim	CA	92805	United States	1/25/2026
Katy sethna	Mission Viejo	CA	92691	United States	1/25/2026
Pantea Tehrani	Aliso Viejo	CA	92656	United States	1/25/2026
Mahbobeh Golzari	Irvine	CA	92618	United States	1/25/2026
Mahsa Atarian	Los Angeles	CA	90043	United States	1/25/2026
Zahra hosseini Hosseini	Laguna Niguel	CA	92677	United States	1/25/2026
pegah rahimi	Irvine	CA	92618	United States	1/25/2026
Hooman Samadzadeh	Woodland Hills	CA	91367	United States	1/25/2026
Mahta Delavar	Woodland Hills	CA	91367	United States	1/25/2026
Sara Habibi	Irvine	CA	92620	United States	1/25/2026
Rosa mohammadi	Laguna Niguel	CA	92677	United States	1/25/2026
tay far	irvie	CA	92612	United States	1/25/2026
Katayon Khorshidi	Garden Grove	CA	92840	United States	1/25/2026
Bita Fahim	Huntington Beach	CA	92648	United States	1/25/2026
Pezhman kavian	Mission Viejo	CA	92691	United States	1/25/2026
Kiyana Kamoei	Aliso Viejo	CA	92656	United States	1/25/2026
Ziba هاشمی	Irvine	CA	92602	United States	1/25/2026
Jamie Dufault	Los Angeles	CA	90006	United States	1/25/2026
Christy Dozor	Huntington Beach	CA	92649	United States	1/25/2026
jude dozor	Huntington Beach	CA	92649	United States	1/25/2026
Emely Jimenez	Los Angeles	CA	90011	United States	1/25/2026
Mohammad Goudarzi	Garden Grove	CA	92843	United States	1/25/2026
Siamak Tehrani	Woodland hills	CA	91307	United States	1/25/2026
Shapoor Kosarimehr	Mission Viejo	CA	92691	United States	1/25/2026
Bahareh Gorgin	Torrance	CA	90505	United States	1/25/2026
samira gh	Los Angeles	CA	90014	United States	1/25/2026
Kathy Ghorbani	Mission Viejo	CA	92692	United States	1/25/2026
Mark Giordani	Los Angeles	CA	91303	United States	1/25/2026
Frances Chao	Huntington Beach	CA	92648	United States	1/25/2026
Ali Sabouri	Anaheim	CA	92801	United States	1/25/2026
Isabel Miguel	Moreno Valley	CA	92551	United States	1/25/2026
Cathy Voong	Huntington Beach	CA	92649	United States	1/25/2026
Cheryl Wyrick	Huntington Beach	CA	92649	United States	1/25/2026
Mehrdad Fathirad	Corona	CA	92883	United States	1/25/2026
Elahe Dana	Irvine	CA	92620	United States	1/25/2026

jarmen sarkisian	Northridge	CA	91325 United States	1/25/2026
Kambiz Esfahani	Anaheim	CA	92801 United States	1/25/2026
Ray Chung	Huntington Beach	CA	92648 United States	1/25/2026
Dariush Deghan	Los Angeles	CA	90023 United States	1/25/2026
Pooneh Ashrafi	Irvine	CA	92602 United States	1/25/2026
Sherry Groff	Huntington Beach	CA	92648 United States	1/25/2026
Giti Mehrafshani	Oak Park	CA	91377 United States	1/25/2026
Maryam Rahimkhani	Aliso Viejo	CA	92656 United States	1/25/2026
Nicole Rahimi	Redondo Beach	CA	90277 United States	1/25/2026
mahsa reisi	Laguna Niguel	CA	92677 United States	1/25/2026
melika khameneyan	Mission Viejo	CA	92691 United States	1/25/2026
Babak Sm	Newport Beach	CA	92660 United States	1/25/2026
Morvarid Hashemi	Anaheim	CA	92801 United States	1/25/2026
William DeNardo	Huntington Beach	CA	92648 United States	1/25/2026
Niloofer Amirpour	Santa ana	CA	92704 United States	1/25/2026
Reza Mohammadiha	Reseda	CA	91335 United States	1/25/2026
Mersedeh N	Lake Forest	CA	92630 United States	1/25/2026
Mary Seyrdian	Ladera Ranch	CA	92694 United States	1/26/2026
Farzaneh Kh	Irvine	CA	92618 United States	1/26/2026
Chase Whitehead	Huntington Beach	CA	92648 United States	1/26/2026
Armita Souran	Santa Ana	CA	92705 United States	1/26/2026
Rebecca Martinez	Long Beach	CA	90803 United States	1/26/2026
Gavin Hartman	Huntington Beach	CA	92648 United States	1/26/2026
Shima Agah	Anaheim	CA	92807 United States	1/26/2026
Amin Hajarian	Irvine	CA	92617 United States	1/26/2026
Saba Ahmadi	Los Angeles	CA	94012 United States	1/26/2026
Giii Delll	Tustin	CA	92780 United States	1/26/2026
Hongli Zhou	Irvine		92618 United States	1/26/2026
sooshiant Mokhtari	Irvine	CA	92618 United States	1/26/2026
Parvin Abdollahi	Riverside	CA	92509 United States	1/26/2026
Phil Geminder	Huntington Beach	CA	92648 United States	1/26/2026
Julie Ault	Huntington Beach	CA	92648 United States	1/26/2026
David Snyder	Huntington Beach	CA	92648 United States	1/26/2026
Annette Geminder	Huntington Beach	CA	92648 United States	1/26/2026
Colin Dootson	Huntington Beach	CA	92648 United States	1/26/2026
parastoo majidi	Irvine	CA	92603 United States	1/26/2026
Saba Baraghani	Moreno Valley	CA	92555 United States	1/26/2026
Maggie Hartman	Huntington Beach	CA	92648 United States	1/26/2026
Queena qu	Riverside	CA	92807 United States	1/26/2026
Ben Lightfoot	Huntington Beach	CA	92648 United States	1/26/2026
Nasrin Homae	Irvine	CA	92602 United States	1/26/2026
Chase Ault	Huntington Beach	CA	92648 United States	1/26/2026
Nikki radan	Anaheim	CA	92825 United States	1/26/2026
Pamela O'Connor	Huntington Beach	CA	92646 United States	1/26/2026

Reza Karkia	Newport Beach	CA	92660 United States	1/26/2026
	نگار صدی Playa del Rey	CA	90293 United States	1/26/2026
Nancy Lanksbury	Huntington Beach	CA	92648 United States	1/26/2026
Michelle Amezcua	Riverside	CA	92506 United States	1/26/2026
sepideh kazemi	Aliso Viejo	CA	92656 United States	1/26/2026
Shiler Naderi	Irvine	CA	92618 United States	1/26/2026
Afsaneh Lashgari	Irvine	CA	92618 United States	1/26/2026
Daniel kim	Corona	CA	92879 United States	1/26/2026
Jacqueline Brodt	Huntington Beach	CA	92646 United States	1/26/2026
Rose fard	Irvine	CA	92614 United States	1/26/2026
targol parsa	Irvine	CA	92620 United States	1/26/2026
Paris Zadeh	Mission Viejo	CA	92692 United States	1/26/2026
Neda Adlgostar	Mission Viejo	CA	92692 United States	1/26/2026
H s	Santa Ana	CA	92704 United States	1/26/2026
Afroz Montaseri	Irvine	CA	92618 United States	1/26/2026
Sheida Mohammadi	Canoga Park	CA	91303 United States	1/26/2026
Roya Rezaei	Anaheim	CA	92802 United States	1/26/2026
Bahareh Alikhaniha	Laguna Niguel	CA	92677 United States	1/26/2026
Curt Hilliard	Huntington Beach	CA	92648 United States	1/26/2026
Axel Merlin	Santa Ana	CA	92703 United States	1/26/2026
David Nelson	Huntington Beach	CA	92648 United States	1/26/2026
behrang alaoddoleh	Tustin	CA	92782 United States	1/26/2026
	مصطفی بهروزی کیا Los Angeles	CA	90060 United States	1/26/2026
Taylor Ault	Huntington Beach	CA	92648 United States	1/26/2026
Tony Zarandi	Laguna Niguel	CA	92677 United States	1/26/2026
Nasrin Hooshvar	Laguna Niguel	CA	92677 United States	1/26/2026
Shelly Hilliard	Huntington Beach	CA	92648 United States	1/26/2026
Mohsen Ghorbani	Los Angeles	CA	90026 United States	1/26/2026
Dylan Sherman	Whittier	CA	90602 United States	1/26/2026
Cynthia Benton	Huntington Beach	CA	92648 United States	1/26/2026
Sogol Nikbakht	Irvine	CA	92618 United States	1/26/2026
Hossein Shargh	Corona	CA	92883 United States	1/26/2026
Ali Gheidi	Laguna Niguel	CA	92677 United States	1/26/2026
Sarah McCoy	Corona	CA	92882 United States	1/26/2026
Neda Bastani	Fullerton	CA	92835 United States	1/26/2026
Arash Kay Moghadam	Reseda	CA	91335 United States	1/26/2026
Mahnaz Doosti	Long Beach	CA	90805 United States	1/26/2026
hau sin wong	Huntington Beach	CA	92648 United States	1/26/2026
Afsan Osivand	Irvine	CA	92612 United States	1/26/2026
Donald Wittenberg	Huntington Beach	CA	92646 United States	1/26/2026
Miranda Ault	Seattle	WA	98109 United States	1/26/2026
Kiyana Kamoei	Aliso Viejo	CA	92656 United States	1/26/2026
Maryam Sadeghi	Mission Viejo	CA	92696 United States	1/26/2026
Narges Beikmohammadi	Fullerton	CA	92833 United States	1/26/2026

Abbas Ahmadi	Irvine	CA	92612 United States	1/26/2026
NAZANIN BIJANI	Los Angeles	CA	90066 United States	1/26/2026
Miranda Kwan	Huntington Beach	CA	92648 United States	1/26/2026
Nasrin Kazem	Woodland Hills	CA	91364 United States	1/26/2026
Mike Miller	Newport Beach	CA	92663 United States	1/26/2026
Soudabeh Zadeh	Anaheim	CA	92807 United States	1/26/2026
Vahideh Kazemzadeh	Corona	CA	92880 United States	1/26/2026
Farzane Sherok	Santa Ana	CA	92703 United States	1/26/2026
Luna Ghani	Tustin	CA	92780 United States	1/26/2026
Fariman Jozeramezani	Anaheim	CA	92807 United States	1/26/2026
Maryam Aipour	Irvine	CA	92614 United States	1/26/2026
Gloria Wu	Placentia	CA	92870 United States	1/26/2026
Zara Nama	Rancho Palos Verdes	CA	90275 United States	1/26/2026
rose Shadi	Laguna Niguel	CA	92677 United States	1/26/2026
Sanaz Mir	Woodland Hills	CA	91367 United States	1/26/2026
Paymaneh Moshrefi	Anaheim	CA	92805 United States	1/26/2026
Alice Westhop	Garden Grove	CA	92840 United States	1/26/2026
omid ziaee			United States	1/26/2026
Alex Namazi	Ladera Ranch	CA	92694 United States	1/26/2026
Samira hesari	Anaheim	CA	92805 United States	1/26/2026
Roya Azad	Irvine	CA	92618 United States	1/26/2026
Nosratolah Bahman	Woodland Hills	CA	91364 United States	1/26/2026
Mah Aj	Rancho Santa Marga	CA	92688 United States	1/26/2026
Alenoosh Hacupian	Glendale	CA	91204 United States	1/26/2026
Fariba Haghjoo	Irvine	CA	92604 United States	1/26/2026
Iran Freedom	Los Angeles	CA	90061 United States	1/26/2026
Saba khorsandi	Bellevue	WA	98006 United States	1/26/2026
Malihe Cheraghi Asl	Los Angeles	CA	90060 United States	1/26/2026
Hamidreza Jafari	Santa Ana	CA	92703 United States	1/26/2026
Sophie Dadhoo	Irvine	CA	92604 United States	1/26/2026
Saeid Zadeghi	Aliso Viejo	CA	92656 United States	1/26/2026
David Shabani	Pomona	CA	91766 United States	1/26/2026
Daryoush Kaviani	Canoga Park	CA	91303 United States	1/26/2026
Naghmeh Masoudinia	Corona	CA	92881 United States	1/26/2026
maedeh moghbel esfahani	Garden Grove	CA	92843 United States	1/26/2026
Fariba Hajjafar	Pittsburgh	PA	15210 United States	1/26/2026
Noshin Askari	Foothill Ranch	CA	92610 United States	1/26/2026
parisa homayouni	Los Angeles	CA	90001 United States	1/26/2026
Tim O'Connor	Huntington Beach	CA	92646 United States	1/26/2026
Yue Zhou	Diamond Bar	CA	91765 United States	1/26/2026
Sara Ramezani	Anaheim	CA	92805 United States	1/26/2026
naeimeh pourzolfaghar	Irvine	CA	92620 United States	1/26/2026
Tahereh Alinejad	Los Angeles	CA	90060 United States	1/26/2026
Sussan Azaria	Westminster	CA	92683 United States	1/26/2026

Ali Khorsand	Aliso Viejo	CA	92656	United States	1/26/2026
Sahar Vahidi	Rancho Santa Marga	CA	92688	United States	1/26/2026
Aram Afarinesh	Westminster	CA	92683	United States	1/26/2026
soheila rezaei	Santa Ana	CA	92704	United States	1/26/2026
Kathy kh	Los Angeles	CA	90060	United States	1/26/2026
Mohammad Mohsenian	Irvine	CA	92620	United States	1/26/2026
Daniel Agajanian	Huntington Beach	CA	92648	United States	1/26/2026
Carl carpenter	Huntington Beach	CA	92648	United States	1/26/2026
Nasima Shansab	Northridge	CA	91325	United States	1/26/2026
Zahra Attar ashrafi	Irvine	CA	92612	United States	1/26/2026
Sonya Branson	Huntington Beach	CA	92648	United States	1/26/2026
Maryam Gilanpour	La Mirada	CA	90638	United States	1/26/2026
Mona Ranjbar	Ladera Ranch	CA	92694	United States	1/26/2026
HARVEY RAHIMIAN.	Van Nuys	CA	91401	United States	1/26/2026
Shahriar Pourbahrami	Woodland Hills	CA	91367	United States	1/26/2026
Azi Toussi	Mission Viejo		92691	United States	1/26/2026
Ana gholami	Aliso Viejo	CA	92656	United States	1/26/2026
Azita Varjan	Riverside	CA	92614	United States	1/26/2026
Mona Fara	Irvine	CA	92612	United States	1/26/2026
Mostafa Delshad	Irvine	CA	92618	United States	1/26/2026
Maryam vatan	Placentia	CA	92870	United States	1/26/2026
Narges Yousef Beigi	Los Angeles	CA	90020	United States	1/26/2026
Miranda Johnson	Newport Beach	CA	92663	United States	1/26/2026
Vida Azari	Los Angeles	CA	90006	United States	1/26/2026
Giti Laki	Laguna Niguel	CA	92677	United States	1/26/2026
Matt D	Fountain Valley	CA	92708	United States	1/26/2026
sina Ghazi	Moreno Valley	CA	92553	United States	1/26/2026
Angineh Davoodian	Rancho Cucamonga	CA	91701	United States	1/26/2026
Moe L	Reseda	CA	91335	United States	1/26/2026
Granaz Movahed	Costa Mesa	CA	92626	United States	1/26/2026
Minoo Rabbani	San Marcos	CA	92078	United States	1/26/2026
Shirin Azizi	Rancho Cucamonga	CA	91730	United States	1/26/2026
Eli ramandi	Los Angeles	CA	90003	United States	1/26/2026
Peymaneh Bakhtari	Irvine	CA	92614	United States	1/26/2026
Behnaz Erfani	Claremont	CA	91711	United States	1/26/2026
Bryan Chang	La Mirada	CA	90638	United States	1/26/2026
Golbahar Janani	Trabuco Canyon	CA	92679	United States	1/26/2026
Matthew Lynch	Huntington Beach	CA	92649	United States	1/26/2026
james jam	Irvine	CA	92618	United States	1/26/2026
Kathy Emerzian	Huntington Beach	CA	92648	United States	1/26/2026
Sami M	Aliso Viejo	CA	92656	United States	1/26/2026
Eli shafi	Irvine	CA	92602	United States	1/26/2026
Anna Zomorod	Los Angeles	CA	90044	United States	1/26/2026
Sam Hudson	Burbank	CA	91503	United States	1/26/2026

Farnaz Amini	Orange	CA	92867	United States	1/26/2026
Roya Bayat	Tustin	CA	92780	United States	1/26/2026
Goli Derogat	San Juan Capistrano	CA	92675	United States	1/26/2026
Arezoo Naderi	Van Nuys	CA	91406	United States	1/26/2026
Ian sender	Newport Beach	CA	92660	United States	1/26/2026
Ben Shamloo@yahoo.com	Los Angeles	CA	90048	United States	1/26/2026
Maryam Nikbakht	Mission Viejo	CA	92692	United States	1/26/2026
Dan De Yo	Yorba Linda	CA	92886	United States	1/26/2026
Sara Azizi	Los Angeles	CA	90006	United States	1/26/2026
Neda Dehghani (ندا)	Winnetka	CA	91306	United States	1/26/2026
pani b	la	CA	90035	United States	1/26/2026
Haideh Tabrizi	Redwood City	CA	94065	United States	1/26/2026
Michael Razipour	Rancho Palos Verdes	CA	90275	United States	1/26/2026
Rassol Eftekharian	Placentia	CA	92870	United States	1/26/2026
francisco solis	Los Angeles	CA	90011	United States	1/26/2026
Kelly casares	Huntington Beach	CA	92648	United States	1/26/2026
Jacqueline Jernigan	Huntington Beach	CA	92648	United States	1/26/2026
Sofi Aram	Anaheim	CA	92805	United States	1/26/2026
Dariush Seddighzadeh	Santa Ana	CA	92705	United States	1/26/2026
Mohammad Karimi	Irvine	CA	92620	United States	1/26/2026
Ellie Bozorg	Mission Viejo	CA	92692	United States	1/26/2026
Sepideh Sohrabnejad	Corona	CA	92880	United States	1/26/2026
Anthony reddy	Huntington Beach	CA	92648	United States	1/26/2026
Sean Khosrovani	Springfield	MA	1108	United States	1/26/2026
Craig Petrime	Garden Grove	CA	92843	United States	1/26/2026
fatemeh yadegar	mission viejo	CA	92692	United States	1/26/2026
Cliff shu	Huntington Beach	CA	92648	United States	1/26/2026
Pari Rafie	Phoenix	AZ	92656	United States	1/26/2026
Allison lloyd	Huntington Beach	CA	92649	United States	1/26/2026
Sol Dr	Los Angeles	CA	90004	United States	1/26/2026
Peter Tillotson	Huntington Beach	CA	92648-612	United States	1/26/2026
Shokofeh Dehghan	Irvine	CA	92603	United States	1/26/2026
Mas Gholami	Los Angeles	CA	90060	United States	1/26/2026
Eric P	Temecula	CA	92592	United States	1/26/2026
Mike Kim	Irvine	CA	92618	United States	1/26/2026
Paris Kasmai	Mission Viejo	CA	92691	United States	1/26/2026
Asal azari	Aliso Viejo	CA	92656	United States	1/26/2026
Nousha H	Aliso Viejo	CA	92656	United States	1/26/2026
Joe Brunner	Huntington Beach	CA	92648	United States	1/26/2026
AJ Benton	Huntington Beach	CA	92648	United States	1/26/2026
Merouj Babaian	Porter Ranch	CA	91326	United States	1/26/2026
Bitra Jafari	Winnetka	CA	91306	United States	1/26/2026
Saied Mirshahidi	Irvine	CA	92618	United States	1/26/2026
robin Wilhite	Westminster	CA	92683	United States	1/26/2026

Haleh Shari	Corona	CA	92880 United States	1/26/2026
Soraya Eslampasand	Long Beach	CA	90802 United States	1/26/2026
Hanieh Allahmoradi	Los Angeles	CA	90006 United States	1/26/2026
Patricia McDaniel	Huntington Beach	CA	92648 United States	1/26/2026
Neda Sho	Aliso Viejo	CA	92656 United States	1/26/2026
Lisa Pinkerton	Long Beach	CA	90803 United States	1/26/2026
Sara Saleh	Laguna Niguel	CA	92677 United States	1/26/2026
Jack Homer	Beverly Hills	CA	90210 United States	1/26/2026
Mathew Salek	Santa Ana	CA	92707 United States	1/26/2026
Vida Dashloo	Irvine	CA	92620 United States	1/26/2026
Minoos Shokrollahi	Panorama City	CA	91402 United States	1/26/2026

**Switzer, Donna**

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**From:** Michael Gates <michaelgates44@gmail.com>  
**Sent:** Thursday, January 29, 2026 7:25 AM  
**To:** Burns, Pat; supplementalcomm@surfcity-hb.org  
**Subject:** Legal Objection to The city planners vote to approve

You don't often get email from michaelgates44@gmail.com. [Learn why this is important](#)

01/29/2026

**City Council of Huntington Beach Attn: Pat Burns**

City of Huntington Beach  
2000 Main Street  
Huntington Beach, CA 92648

**Re:** *Legal Objections to the Application of Class 32 Categorical Exemption for the Conversion of Active Recreation to Overnight Lodging at The Huntington Club*

Dear City Manager Hopkins:

I write on behalf of myself and the community to formally raise legal concerns regarding the City's reliance on a Class 32 categorical exemption under the California Environmental Quality Act (CEQA) for the proposed conversion of active recreation (tennis courts) to overnight lodging.

It is well settled that a Class 32 exemption may only be applied where the project is:

“Consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.” (CEQA Guidelines §15332(a)). All five criteria (a)–(e) must be satisfied, and *if any one criterion fails, the exemption cannot be used*. Further, the consistency determination must be supported by substantial evidence in the administrative record at the time of action.

Recent judicial decisions underscore the enforceable nature of the consistency requirement. For example, in *United Neighborhoods for Los Angeles v. City of Los Angeles* (2023), the Court of Appeal voided a Class 32 exemption where the agency failed to demonstrate consistency with all applicable General Plan policies based on substantial evidence in the record. Courts have also held that consistency must be assessed with respect to *any incorporated plans* that govern the site before a Class 32 exemption can be validly adopted.

Under the City of Huntington Beach General Plan, *Open Space* is identified as a distinct land use category focused on recreation and resource conservation, and the Huntington Beach Zoning Ordinance implements the General Plan. The proposed conversion of active recreation uses (such as tennis courts) to overnight lodging raises a direct question regarding whether such use is authorized under the current General Plan land use designation and existing zoning—*unless overnight lodging is specifically permitted as a use under those current standards*.

Moreover, anticipated future General Plan amendments or rezones cannot be used to justify the present finding of consistency. The law is clear that agencies may not rely on speculative or enacted but not yet effective dispositions; the exemption must be justified based on existing designations and regulations *as of the date of the action*.

To address these legal requirements and ensure a complete, supported administrative record, please provide the following information on the administrative record:

1. **The exact General Plan land use designation** for the subject parcel and the specific *policy text* relied upon to support a finding that overnight lodging is permitted within the applicable Open Space/Recreation designation under the existing General Plan.
2. **The precise sections of the Huntington Beach Zoning Ordinance** authorize overnight lodging in the applicable zoning district (either by right or through a conditional use permit) based on current code provisions.
3. A written confirmation that the City's consistency finding is based **solely on existing land use designations and zoning regulations** as of the date the exemption was adopted—not on anticipated or future legislative actions.
4. Identification of the **substantial evidence in the administrative record** that supports the finding of consistency with all applicable General Plan policies and zoning regulations.
5. The City's analysis of whether the **conversion of active open space to overnight lodging constitutes "unusual circumstances"** under CEQA Guidelines §15300.2, which could preclude the use of a categorical exemption.

If any of the foregoing cannot be answered in writing with substantial evidence in the record, the City's reliance on a Class 32 categorical exemption for this project would be legally deficient and subject to challenge.

Please provide the above information **no later than 30 days** so that it may be included in the administrative record related to this project.

During last night's meeting, the club was repeatedly referred to as a "private club." I want to be clear that this is not an accurate description.

Thank you for your careful attention to these important CEQA requirements. I look forward to your prompt response and the establishment of a complete, supported record.

On a side note, something that also concerned me, I want to reiterate that this is **not** a private club; it is a **semi-private** club.

There is no membership board, and there is no member input or governance related to golf, tennis, or any other memberships or amenities that are offered. Decisions are not subject to member review or participation; if members are dissatisfied, they are simply told they can leave.

I felt it was important to clarify this point to avoid any misunderstanding going forward.

Thank you, respectfully submitted,

**Michael Gates, President**

[Michaelgates44@gmail.com](mailto:Michaelgates44@gmail.com) 714-425-4004