

Beckman, Hayden

From: Villasenor, Jennifer
Sent: Monday, October 9, 2023 7:03 PM
To: Beckman, Hayden
Subject: FW: Proposed Bolsa Chica Senior Living Community Project, SCH No. 2022110040
Located at 4952 and 4972 Warner Avenue, Huntington Beach

From: Davoud@manouchehri.com <Davoud@manouchehri.com>
Sent: Saturday, October 7, 2023 11:17 AM
To: Planning Commission <planning.commission@surfcity-hb.org>; Strickland, Tony <Tony.Strickland@surfcity-hb.org>; Van Der Mark, Gracey <Gracey.VanDerMark@surfcity-hb.org>; Burns, Pat <Pat.Burns@surfcity-hb.org>; McKeon, Casey <Casey.McKeon@surfcity-hb.org>; Kalmick, Dan <Dan.Kalmick@surfcity-hb.org>; Moser, Natalie <Natalie.Moser@surfcity-hb.org>; Fikes, Cathy <CFikes@surfcity-hb.org>; Bolton, Rhonda <Rhonda.Bolton@surfcity-hb.org>; Pellman, Tracy <Tracy.Pellman@surfcity-hb.org>; Twining, Butch <Butch.Twining@surfcity-hb.org>; Acosta-Galvan, Kayla <Kayla.Acosta-Galvan@surfcity-hb.org>; Rodriguez, Oscar <Oscar.Rodriguez@surfcity-hb.org>; Adam, Ian <Ian.Adam@surfcity-hb.org>; Kennedy, Don <Don.Kennedy@surfcity-hb.org>; Wood, Rick <Rick.Wood@surfcity-hb.org>
Subject: Proposed Bolsa Chica Senior Living Community Project, SCH No. 2022110040 Located at 4952 and 4972 Warner Avenue, Huntington Beach

Dear Mr. Hayden,

My name is Davoud Manouchehri, I live at 17442 Kennebunk Lane, Huntington Beach, CA. I would like to provide comments to the statements and findings of the Draft Environmental Impact Report Related to the proposed Bolsa Chica Senior Living Community Project, SCH No. 2022110040 Located at 4952 and 4972 Warner Avenue, Huntington Beach, CA. I would also like to be listed as a Interested Individual and receive all future correspondence, technical information and hearing notices.

First and foremost, I object to the general plan amendment to change the land use designation from CG to mixed-use (MU) and I object to the zoning map amendment to change the zoning from CG to specific plan (SP). I also object to the increase in allowable floor area ratio to 2.5 and I object to raising the maximum building height to 65 feet. I believe the impact to the environment has not been reasonably assessed and I have a strong disagreement to several statements made in the draft EIR. The project's inconsistency with the city of Huntington Beach policy and zoning will cause significant physical environmental impacts to our neighborhood.

My comments and concerns to the draft environmental impact report are as follows:

1.4 significant and unavoidable impacts:

I firmly disagree with the statement "the proposed project would not result in significant and unavoidable adverse impacts to the existing environmental setting" the proposed project would create a precedent for future development, the draft environmental impact report does not consider the approval of the project will open the door to future similar developments in the area. The effects of allowing a specific plan to subvert zoning regulations would cause extreme interest in developing surrounding projects of similar nature. This project needs to study the long-term accumulative impact of increasing the code required maximum density, the lack of code required parking and the effect on the adjoining neighborhood and the ability for the adjoining neighborhoods to absorb the street parking that would result in the deficiency of the required parking. The environmental impact report should also study the long-term effects of the sewer capacity and water capacity of the surrounding existing development of similar nature that could be redeveloped

if this project were approved. The draft environmental impact report failed to provide a sewer capacity and water capacity study.

1.5.2 identification of the environmentally superior alternative:

I disagree with the alternate project, an alternate project could be proposed that complies with the existing adjacent zoning that is consistent with the surrounding community.

I firmly disagree “the no project alternative would result in greater environmental impacts to air quality and transportation to the surrounding circulation system due to the greater number of vehicle trips to and from the project site” zoning similar to the adjacent properties would result in less impact than the proposed project but would still achieve the goal of providing senior housing.

4.1; aesthetics

I disagree with the statement “the proposed project would not conflict with relevant goals and policies in terms of preserving the visual quality in the city” the city has developed zoning standards which does not allow for a 65-foot-high building structure. The building structure would tower over the existing residence which are only 2 stories tall. The proposed structure is not compatible in proportion, scale or character to the adjoining uses.

4.7 land use and planning

I believe the project would cause a significant environmental impact due to the conflict with the existing land use plan. Approval of this project would lead to approval of multiple projects in the area which would have a massive accumulative impact on the community which include aesthetics, traffic, noise, solar access, wind access, impacts to the infrastructure such as water and sewer capacities and street parking. The proposed project is inconsistent with the city’s established development standards which have been used to design the surrounding infrastructure. The surrounding infrastructure was not designed to handle the proposed densities. I disagree that the overall impact to surrounding community would be less than significant when the cumulative effect of future developments similar to the proposed project is considered.

4.10: utilities and service systems

I disagree with the statement “the proposed project would have less than significant impacts associated with electric power and natural gas”. The cumulative effect of approving this project would cause a landslide of similar developments in the area which would have a major impact to the available electric energy and natural gas, the existing infrastructure did not consider increasing the bulk density and mass of the proposed development. Approval of this project would cause additional projects of a similar nature that would have a cumulative effect on the availability of electricity and gas.

2.4.1 Aesthetics

I disagree with the statement “not create a source of substantial light or glare”. Security and patio lighting on the 5th floor would be seen from the entire neighborhood. Nothing in the EIR evaluated the lighting spillover into the wetlands which requires dark sky. The Brightwater development respects the dark sky requirements of the Bolsa Chica Ecological Preserve, this project should address the impact to the Bolsa Chica Ecological Preserve. The proposed building elevations shown in the draft EIR appear to show exterior lighting fixtures that are not properly shielded. It is impossible to provide adequate lighting for the patio areas and shield all of the light spillover.

2.4.8 hydrology and water quality

Bolsa Chica Road Street of Warner Avenue lacks sufficient storm drain facilities to capture runoff from the East that flows to the intersection of Bolsa Chica Street and Dunbar Avenue, as a result this intersection experiences flooding during normal rain events. The adjacent existing parking lot serves as an incidental detention basin and helps protect the surrounding properties. The EIR fails to analyze and address the effect of construction over the parking lot which would reduce the available ponding space and could cause flooding on adjacent properties. I believe this project will increase the depth of flooding at the intersection of Bolsa Chica Road and Dunbar Avenue.

2.4.14 recreation

I disagree with the statement “the proposed project does not include recreational facilities nor require the construction or expensing of recreational facilities that would result in a significant adverse physical effect to the environment, therefore project related impacts with respect to recreation are not evaluated further in this draft EIR”. The proposed project is significantly under parked according to existing zoning, the city of Huntington Beach has established parking standards that eliminate the need for street parking. If developed, this project would cause excessive street parking which would inhibit access to the trail system. There is already a shortage of parking for people who are visiting the Bolsa Chica wetlands, this project would severely impact the available street parking leading to the trailhead at the southerly terminus of Bolsa Chica Street. The proposed project only considers parking spaces for the residential units and fails to address the required parking spaces for the estimated 110 employees who will work at the proposed multiple restaurants, wellness centers and studio spaces. It is not reasonable to assume 62 units are parked at a ratio of 0.65 spaces per unit when there is no mechanism stated to control whether a unit is assisted living or normal senior housing. I believe the parking should be evaluated as worst-case senior housing and a separate calculation added for the multiple restaurant style dining venues, wellness centers and studio spaces. Due to the lack of parking this development does not support the protection and maintenance of environmental open-space resources. The lack of on-site parking will prohibit access to the Bolsa Chica trail system.

2.4.16 utilities and service systems

I disagree with the statement “therefore, impacts related to the construction of wastewater treatment or collection facilities would be less than significant”. Recently the Orange County sanitation District upgraded the sewer force mains and lift stations throughout the city, these systems should have been designed to comply with the existing zoning and did not consider the increased density this project is proposing. This project should consider the cumulative effect of increasing the density of existing sites within the vicinity to verify the additional sewer capacity is available to serve this site and future developments of this nature. The environmental impact report failed to provide an adequate sewer and water capacity study.

4.1.6 project impacts

I disagree with the statement “given the current visual quality of the project site, implementation of the proposed project consistent with the development standards and design guidelines specified in the specific plan would promote a cohesive community identity and enhance the visual quality of the project site to viewers on an off-site”. Increasing the maximum height of the building to 65 feet would block the skyline view from the public way, the open sky view at the corner of Bolsa Chica and Warner would be forever impacted and would effect every person visiting the neighborhood, the view would be replaced by a massive apartment building. Replacing a blue-sky view with an apartment building would have a negative impact on the community by destroying public view of the sky.

I also disagree with the statement “therefore, implementation of the proposed project would not result in significant shade or shadow impacts to nearby residential uses. The shade and shadow study prepared by CRTKL is seriously flawed, a 65 foot tall structure will cast a shadow in the easterly and westerly directions during sunrise and sunset during the spring and fall equinox, only the winter solstice was studied. This study proposes a shadow less than the building height. A study of the spring and fall equinox would prove Expensive shadows would be cast on the residential properties to the east and west of the proposed development.

4.1.10 cumulative impacts

I disagree with the statement “approval of the general plan amendment and zoning amendment would render the proposed project consistent with the city’s establish development standards and no mitigation would be required.” The existing zoning has been adopted by the residents for years and has been relied on by the residents to protect the integrity of the community. Allowing the general plan amendment and the zoning map amendment to change the zoning from CG to specific plan would cause long-term environmental impacts to the community. If this project is approved there will be a landslide of similar developments that will forever change the density of the community, this is evidenced by the recent development at Bella Terra and downtown Huntington Beach. This project should evaluate the

cumulative impact of all sites of similar nature that would be subject to redevelopment. This project is not compatible with the long-term established development standards in the area.

4.2.3.1 air pollutants and health effects

The draft EIR failed to study the air quality in the vicinity of the project and used air quality data from Anaheim California, approximately 10 miles from the proposed development.

As stated in the initial study "occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease." The air quality study fails to consider the proposed development and the residents who will be living in the proposed development. Bolsa Chica Street and Warner Avenue are both 3 lane major highways that produce a significant amount of emissions. The study should consider the effect of these emissions on the people who will be living in the proposed development. As stated in the environmental impact report "high-volume roadways. Air pollutant exposures and their associated health burdens vary considerably within places in relation to sources of air pollution. Motor vehicle traffic is perhaps the most important source of intra-urban spatial variation in air pollution concentration." Obviously, this site is not suitable for senior housing due to the proximity of the high-volume roadways.

Table 4.7.B: Gen. plan consistency analysis ERC-A

I disagree with the statement "these recreational and open-space elements would be for private use by residents and not open to the public but are anticipated to reduce the strain on surrounding parks and open spaces as residents would be more likely to use the on-site facilities." The proposed project does nothing to maintain the current Park per capita ratio of 5.0 acres per 1000 persons, the proposed development does not include any public open space for parks.

We trust the city of Huntington Beach will not allow the certification of the environmental impact report and deny this project for the reasons stated above.

Thank you,

Sincerely

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Davoud Manouchehri

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