



FOOTHILL COMMUNITIES ASSOCIATION
Serving the Entire Unincorporated North Tustin Area
Post Office Box 261 • Tustin, California 92781

Ms. Laree Brommer, Manager
Orange County Public Works/Land Use Planning
300 North Flower Street
Santa Ana, California 92702-4048

Also sent by email to Channary Leng

In Reference To: Initial Study No. PA090004
Bethsaida Senior Living Project
13765 Newport Avenue
Unincorporated Orange County
North Tustin Specific Plan

Dear Ms Laree Brommer:

This letter supplements the comments made by the Foothill Communities Association in my letter dated August 21, 2009 concerning the scoping of the EIR for the Springs at Bethsaida project. The FCA has two additional comments/requests concerning the scoping of the EIR as follows:

1. Story poles should be erected during the EIR process to depict for the community and the County the size, massing and scale of the project, particularly the structures that are proposed to be constructed. A framework of steel or wood poles should be erected and connected with orange construction mesh so that the story poles and netting create an accurate silhouette of the proposed structures, their size, scale and massing. An example of such story pole depiction can be found at <http://californiastorypoles.com/index.html>. Such story poles are commonly used in the coastal zone and in a number of cities to demonstrate the potential visual impact of a project before it is built.
2. The FCA requests that the cumulative impacts section of the EIR take into consideration the potential that not only the property at the northwest corner of Newport and 17th Street but also the properties on the east side of Newport between La Loma and Foothill

may change zoning to office, commercial, or multi-family use due to the precedent of a zone change on the 7.25 acres and requests that the EIR study the potential impacts that such cumulative changes in zoning would bring. The FCA notes that many of the properties on the east side of Newport between La Loma and Foothill requested a change in zone to allow office and or other uses different than single family residential during the 1982 North Tustin Specific Plan process because they front on Newport and are subjected to noise, traffic, visual and other impacts that caused the property owners to assert that a change in use was appropriate. Such a change was rejected by the community and County when the NTSP was adopted based upon the determination that the plan area north of 17th street should remain single family residential so as to protect and preserve the established single family residential neighborhoods north of 17th Street. Similarly, the property at the northwest corner of Newport and 17th Street has sought a zone change to allow commercial use during the past few years. Will a change of zone to multifamily use for the 7.25 acres increase pressures to allow a zone change for these other properties and, if so, what will the impacts be on the surrounding single family residential neighborhoods?

Please let me know whether these requests/comments will be considered in determining the scope of the EIR for the project? In our initial response, we asked for this consideration.

Very Truly Yours,

Original signed as R D Nelson

Richard Nelson
President, FCA