

**No Orange Heights - Orange City Council Meeting
Public Comment Template
DATE: Tuesday, August 27, 2024**



Orange City Council Meeting Begins: 6:00 PM (please arrive at least 30 min. early)

Location: 300 E. Chapman Ave, Orange, CA 92866

Contact: Joel Robinson if you have any questions @ jrobinson@naturalist-for-you.org

Overview:

This document provides a template for in-person and written public comment along with relevant links.

We are currently working with city council members to request an agenda item from the city council and will update this document with more specific details when and if this topic is agendaized.

Goal:

In crafting your public comment, please keep in mind our goals we have for speaking during this city council meeting:

- Requesting the city council require a new Environmental Impact Report (EIR) be conducted by the Irvine Company and give the community an opportunity for meaningful public comment and engagement
- Preventing the Irvine Company from developing the land and preserving the open space in Orange County

Links:

- [No Orange Heights Webpage](#)
- [No Orange Heights Petition](#)
- [Residents protest Irvine Company plan to build 1,180 houses in wildlife corridor—OC Register](#)
- [Group looks to halt planned 400-acre housing community in OC—ABC 7 News](#)

Public Comment Templates

Orange City Council Open Session Meeting Begins: 6:00 PM

Options for submitting a public comment:

- In-person comment at City Hall
- Written comment through email
- Voicemail comment through phone

We encourage you to show up in person to give your comment if possible.

In-Person Comment at City Hall

You must be in person and submit a speaker card at the city hall by 6:00 PM on Tuesday, August 27, 2024, to speak at the city council meeting.

What to Know:

- Start by identifying yourself by name and city of residence. If you live in Orange, [identify your district as well](#). You should also share any other reason you are connected to this issue.
- Be clear which agenda item you are addressing and whether you support or oppose the item.
- Avoid profane language during your comment.
- The city council is not allowed to respond directly to your comment, but they are meant to take note of your comment for their discussion.
- Each public comment is allowed 3 minutes, although the city council is allowed to shorten the time. Typically they only do this if there are dozens of speakers in queue for the night.

Talking Points:

- Wildfire Risk
 - The proposed project is located in a Very High Fire Severity Zone, which would put thousands of residents in harm's way. In 2017, the Canyon Fire 2 burned the entire area, including Irvine Park and Peters Canyon, for a total of 9,217 acres. The Silverado Fire threatened the same area in 2020. A wildfire burned in Irvine Regional Park in July 2023. Other similar proposed projects in Los Angeles and San Diego County have been stopped for this exact reason. Even if the developer pays for a fire station, they won't pay for firefighters salaries or equipment in perpetuity, so the City will be on the hook for that (in which case property taxes will need to be increased). Also, there is the issue of fire insurance, since many insurance companies are pulling out of CA and refusing to write new fire insurance policies when they come up for renewal.
- Environmental Impact Report & California Environmental Quality Act:
 - The EIR is outdated. It was approved by the Orange City Council despite widespread opposition in 2005. The environmental circumstances have changed drastically in the last 19 years.
 - The Orange Heights housing project violates California's SB 743 from 2013, which prioritizes Vehicle Miles Traveled (VMT) over vehicular Level of Service (LOS) for developments. The Orange Heights development would force residents to rely on personal automobiles to access job centers, as it is not transit-accessible, and thus would entail a high VMT in violation of SB 743 and contribute to greenhouse gas emissions. This is the opposite of what new housing developments should strive for.
- Traffic & Road Safety
 - This project, being car-dependent and far from transit stations, will worsen traffic congestion for other Orange County residents.

- The Irvine Company has proposed widening Santiago Canyon Road as part of this project, and only providing a Class II painted bike lane to serve the numerous bicyclists who travel to and use the trails in the adjacent Irvine Regional and Peters Canyon Parks. Road widening projects have been shown to induce demand and worsen congestion long-term. A Class II bike lane, which offers zero protection to bicyclists riding along 50 MPH road, would be incredibly unsafe and shows that the Irvine Company has failed to consider the safety of all road users.
- Impact on Environment
 - The Orange Heights housing development would bulldoze an existing wildlife corridor and eliminate a critical habitat for a number of native California animal species.
 - Sensitive wildlife species, including mountain lion, mule deer, bobcat, white-tailed kite, northern harrier, long-tailed weasel, greater roadrunner, California quail, coastal California gnatcatcher, coastal cactus wren, least Bell's vireo, butterflies, bats and other species who require large amounts of contiguous undeveloped open space are heavily reliant upon this proposed project site as crucial habitat (food, shelter, cover and space for movement), especially because it is perfectly situated between Irvine Regional Park, Peter's Canyon and the Santa Ana Ana Mountain range.
 - M317, a single male lion just past dispersal age, was observed on the property within the last 10 months. Other large-scale developments (thousands of dwelling units) and the toll roads, have already decimated the populations of these sensitive species in Tustin, Anaheim Hills, Irvine, Lake Forest, Mission Viejo and San Juan Capistrano. The open space that has been set aside cannot fully accommodate the species that are relying on the habitat at the proposed project site.
 - On January 18, 2024, Uno, a 4 year old mountain lion that was monitored for 2 years as part of research conducted by UC Davis, was struck by a vehicle while she was trying to cross Santiago Canyon Road during rush hour. She had previously lost all 4 kittens in a litter and was pregnant when she died. The population of mountain lions in Orange County is shrinking, and the loss of a female of breeding age is crushing. If Orange Hills is developed, traffic will increase, which will likely result in more animals being injured or dying to vehicular collisions.
- Democratic Process:
 - There is no meaningful opportunity for public comment and engagement with this process currently. We deserve to have community-led developments that would suit the needs of the residents and people who use this space, not developments that prioritize a corporation's profit.
- Housing
 - None of the housing being built is affordable housing, but even if it were, it is still an inappropriate location for such a project.
 - Per the Irvine Company's Orange Heights Master Plan website, this development would be almost entirely detached single-family homes, which is the most

environmentally-devastating form of housing we can build. This type of project contributes significantly to climate change without meaningfully addressing housing needs and lack of affordable housing in the city and county.

- Instead of bulldozing a pristine wildlife habitat to build an unsustainable development of detached single-family homes, we advocate for infill development and redevelopment within already-developed areas of the city, near transit stations and job centers—plenty of such property exists within population centers in Orange. We need housing—but not here and not of this type. Let's preserve the precious open space we have left. Let's instead focus on infill housing projects, on land that has already been developed
- Impact on Native American Cultural Resources
 - The Orange Heights (Santiago Hills II) proposed project area is known by the Gabrieleno/Tongva San Gabriel Band of Mission Indians to be a culturally sensitive area for both pre-contact and post-European arrival cultural resources important to our people. The open space of the proposed project area is contiguous with other preserved open space, including canyons, where a number of village sites were located. This contiguous space represents an important cultural landscape, potentially a Traditional Cultural Property, where views and landforms still exist as they did prior to European and American settlement.
 - As a part of the cultural resources study completed for the 2005 Environmental Impact Report (EIR) for Santiago Hills II, archaeologists removed one acre of grass and sage scrub species from the surface of CA-ORA-556 as part of the site evaluation process. The site was tested to determine if it was eligible for listing on the California Register of Historical Resources (CRHR) under Criterion 4. In addition to clearly mapping a sample of a village site, the testing confirmed the site was potentially eligible for listing on the CRHR. Therefore, the site is a historical resource and considered a unique archaeological resource for the purposes of California Environmental Quality Act.
- Responsible City Budget
 - The City of Orange will be forced to foot the bill for this development's inevitably high maintenance costs, such as road repairs, power lines, and water and sewer lines. These bills will be higher than average due to the relatively remote location and sprawling nature of this development. This means that existing residents will subsidize this project without enjoying any benefit to their own quality of life.

Written Comment through Email

Written comments must be received by Tuesday, May 14 or May 28 at 3:00 PM. While written comments are entered into public record and are considered by the council, they are not read aloud during the meeting.

Email Template:

If you are on a computer, click the blue email icon below to open the template below in your email. If you are on mobile, [click here to populate the city council's email addresses in your email](#); you will need to add Joel's email to the BCC field and copy the template from this

document. Change any details needed and personalize the email by editing all parts highlighted in green before you hit send.

To	dan@danslater.com ; abarrios@cityoforange.org ; jdumitru@cityoforange.org ; ktavoularis@cityoforange.org ; dbilodeau@cityoforange.org ; anagutierrez@cityoforange.org ; jgyllenhammer@cityoforange.org
Bcc	jrobinson@naturalist-for-you.org
Subject	Oppose the Orange Heights Development

Dear Mayor Dan Slater and Orange City Council,

My name is [REDACTED], and I live in the city of [REDACTED], [District #, if Orange]. I am in strong opposition of the development of the Orange Heights neighborhood by the Irvine Company.

[Explain your connection to this campaign or why No Orange Heights is important to you. You can use [these talking points](#) to help write your email.]

In conclusion, I urge you to stop the development of Orange Heights immediately.

Best regards,

[Your first and last name], [city of residence]

Voicemail Comment through Phone

You can call (714) 744-2234 and leave a voicemail by 5:00 PM on Tuesday, May 14 or May 28, 2024. Voicemails will not be played during the meeting but will be provided to the council.