

CLAYSON, BAINER & SAUNDERS

ROLAND C. BAINER
DAVID R. SAUNDERS

A PROFESSIONAL LAW CORPORATION
CLAYSON LAW BUILDING
601 SOUTH MAIN STREET
CORONA, CALIFORNIA 92882
TEL: (951) 737-1910
FAX: (951) 737-4384

WALTER S. CLAYSON
1887 - 1972
E. SPURGEON ROTHROCK
1918 - 1979
DERRILL E. YAEGER
1927 - 2010
ROY H. MANN
1923 - 2018

June 25, 2025

City Clerk
City of Corona
400 S. Vicentia Avenue
Corona, CA 92882

**Re: Appeal of Planning Commission Recommendation
for Denial of TTM 37895**

Dear City Clerk:

The applicant Mari Girgis, LLC, hereby appeals the action of the Planning Commission on June 23, 2025, that recommended the disapproval of TTM 37895 (the "Project"). This appeal is based on the following grounds:

The Project complies with the R-1-12 zoning for the site, and the General Plan designations of ER and LDR, which are intended for low-density, single-family development. All necessary public improvements associated with the Project are guaranteed with the development of the Project. All potential environmental impacts associated with the Project have been identified in the original MND and the Addendum to the original MND and are capable of being mitigated. Safe and adequate access to the Project site is provided with a second point of access that is necessary by the Fire Department.

TTM 37895 should be approved based on the recommended conditions of approval attached hereto and the findings of approval below.

1. The Project was previously evaluated under a mitigated negative declaration which was adopted by the City Council on August 20, 2014. Pursuant to Section 15164 of the State CEQA (California Environmental Quality Act) Guidelines, the City as the lead agency determined that the proposed Project, and the Addendum to the previously adopted MND, demonstrate that the environmental analysis, impacts, and mitigation requirements identified in the previously adopted MND remain substantively unchanged despite project modifications. The proposed Project does not raise any new environmental issues or result in impacts not previously analyzed in the prior MND, and none of the conditions requiring the preparation of a subsequent MND, described in Section 15162 of the State CEQA Guidelines, exist.

EXHIBIT 2

2. None of the conditions provided in Section 66474 of the California Government Code exist for the following reasons:

- a. *The proposed map is consistent with the General Plan designations of Estate Residential and Low Density Residential, which allow residential development at a density range of 1 to 3 dwelling units, and 3 to 6 dwelling units to the acre, respectively. The overall density of the Project is 1.67 du/ac.*
- b. *The design of the lots proposed by this subdivision is consistent with the development standards established by the Corona Municipal Code for the R-1-12 zone with respect to minimum lot area, width and depth.*
- c. *The site is suitable for the type of development proposed and offers adequate access from Laurel Canyon Way and Shadow Valley Drive via State Street.*
- d. *The site is physically suitable for the proposed density of development because the Project is capable of accommodating 103 single family residential lots that adhere to the site's zoning and General Plan designations.*
- e. *The design of the subdivision or the proposed improvements is not likely to cause substantial environmental damage or substantially injure fish or wildlife or their habitat because, as identified in the Project's Addendum to the previously adopted Mitigated Negative Declaration, all potential environmental impacts are capable of being mitigated to less than significant levels.*
- f. *The proposed subdivision will not result in adverse impact to public health, safety or general welfare because the Project adheres to the development standards of the site's R-1-12 zone, which promotes orderly development of the Project site, and the improvements associated with the Project adhere to city standards.*
- g. *The design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision because no such easements exist on the Project site, or the easements are being protected in place or relocated elsewhere on the Project site.*

3. Pursuant to California Government Code Section 66473.5, consistency with applicable General Plan or Specific Plan does exist for the following reason:

- a. *The General Plan's Low Density and Estate Residential designations allow for low density, residential development according to the density ranges of 1 to 3 du/ac and 3 to 6 du/ac, respectively, resulting in a range of 71 to 199 dwelling units according to*

the acreage allocated in the LDR and ER designations on the Project site. The 103 dwelling units proposed by TTM 37895 are within the range of dwelling units allowed by the General Plan.

4. Pursuant to California Government Code Section 66474.6, the discharge of waste from the proposed subdivision into existing community sewers would not result in violation of existing requirements presented by the Santa Ana Regional Water Quality Control Board pursuant to Division 7 (commencing at Section 13000) of the Water Code for the following reason:

- a. *The amount of discharge to be produced by the development does not exceed the limit established by the Santa Ana Regional Water Quality Control Board as monitored by the city's Utilities Department.*

5. Pursuant to California Government Code Section 66473.1, the design of the subdivision would provide, to the extent feasible, for future passive or natural heating or cooling opportunities for the following reason:

- a. *The subdivision is designed in a manner that would potentially allow residential structures opportunity for passive or natural heating or cooling opportunities because the lots are adequate in size to accommodate the construction of homes with solar exposure.*

6. The proposal is in conformance with the standards of the R-1-12 Zone for the following reason:

- a. *The lots proposed by the subdivision are for single family residential purposes which is a permitted use within R-1-12 zone. The lots also comply with the minimum lot area, width and depth requirements prescribed by the Corona Municipal Code for the R-1-12 zone.*

7. The proposal is in conformance with Title 16 (Subdivisions) of the Corona Municipal Code for the following reasons:


- a. *The proposed map meets the city's subdivision standards for lot area, width and depth, and has adequate vehicular access from Old Temescal Road/Laurel Canyon Way and Shadow Valley Drive.*
- b. *Required public improvements are guaranteed with this subdivision to ensure orderly development of the Project site, which are presented as conditions of approval for the Project.*

*City Clerk
City of Corona
June 25, 2025
Page 4*

8. See attached Conditions of Approval.

9. The Planning Commission failed to make a written report of findings of fact to the City Council recommending that the Council deny the tentative tract map, as required by Corona Municipal Code section 16.12.063.

Very truly yours,


David R. Saunders

DRS:lb
Enclosures

Mari Girgis, LLC\General .0\LTR\062525CityClerk