City of Costa Mesa

FAIRVIEW DEVELOPMENTAL CENTER SPECIFIC PLAN DRAFT EIR

May 2026 | Draft Environmental Impact Report

State Clearinghouse No. 2025101405



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for City of Costa Mesa

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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This executive summary has been prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. This Draft Environmental Impact Report (EIR) addresses the environmental effects associated with the implementation of the proposed Fairview Developmental Center Specific Plan (proposed project) (FDCSP). CEQA requires that local government agencies consider the environmental consequences before acting on projects over which they have discretionary approval authority. An EIR analyzes potential environmental consequences to inform the public and support informed decisions by local and State governmental agency decision makers.

This EIR has been prepared pursuant to the requirements of CEQA and the City of Costa Mesa's CEQA procedures. The City of Costa Mesa, (City) as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on the City technical personnel from other departments and review of all technical subconsultant reports.

ES.2 ENVIRONMENTAL PROCEDURES

This EIR has been prepared pursuant to CEQA and the CEQA Guidelines to assess the environmental effects associated with implementation of the proposed project as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis, and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR, determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a statement of overriding considerations if significant impacts cannot be avoided.

ES.2.1 Draft EIR Organization

Executive Summary. Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues that need to be resolved, and the potential environmental impacts and recommended mitigation measures identified for the project.

Chapter 1: Introduction. Describes the purpose of this EIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final EIR certification.

Chapter 2: Project Description. Provides a detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this EIR.

Chapter 3: Environmental Analysis. Each environmental topic is analyzed in a separate section that discusses: the applicable regulatory framework; existing conditions; the significance criteria used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the potential adverse and beneficial effects of the project; the level of impact significance with and without mitigation; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed projects in the area.

Chapter 4: Alternatives to the Proposed Project. Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project/No Development Alternative, No Project (General Plan Buildout/No Specific Plan), and Adaptive Reuse of Historic District Alternative.

Chapter 5: Other CEQA Considerations. Provides a discussion of effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects.

Chapter 6: Report Preparers and Organizations Consulted. Includes a list of people and organizations that prepared or were contacted during the preparation of this Draft EIR.

Appendices. The appendices for this document include the following supporting documents:

- Appendix A.1: Notice of Preparation and Scoping Meeting Comments
- Appendix B.1: Air Quality and GHG Modeling
- Appendix C.1: Biological Technical Report
- Appendix C.2: Tree Survey and Arborist Report - 2026
- Appendix C.3: Tree Survey and Arborist Report - 2024
- Appendix D.1: Archaeological and Built Environment Resources Inventory Report
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- Appendix L.1: Alternatives Trip Generation

ES.2.2 Type and Purpose of this Draft EIR

As described in the CEQA Guidelines, different types of EIRs are used for varying situations and intended uses.

This EIR fulfills the requirements for a Program EIR. According to Section 15168 of the CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a Program EIR gives the lead agency an opportunity to consider broad policy alternatives and program-wide mitigation measures, with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare Program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities may be within the Program EIR's scope, and additional environmental documents may not be required (CEQA Guidelines Section 15168[c]). When a lead agency relies on a Program EIR for a subsequent activity, it must incorporate feasible mitigation measures and alternatives from the Program EIR into the subsequent activities (CEQA Guidelines Section 15168[c][3]). If a subsequent activity would have effects outside the scope of the Program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines encourage the use of Program EIRs, citing five advantages:

- Provide a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR;
- Focus on cumulative impacts that might be slighted in a case-by-case analysis;
- Avoid continual reconsideration of recurring policy issues;
- Consider broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them;
- Reduce paperwork by encouraging the reuse of data (through tiering). (CEQA Guidelines Section 15168[h])

ES.3 PROJECT LOCATION

The City is surrounded by other incorporated cities within Orange County, including Irvine, 5.5 miles to the east of the project site; Santa Ana, 6.5 miles to the north; Fountain Valley, 4 miles to the west; Huntington Beach, 4 miles to the southwest; and Newport Beach, 5 miles to the south.

The FDCSP covers approximately 93 acres at the 109-acre main campus of the Fairview Developmental Center (FDC) facility at 2501 Harbor Boulevard and 2 acres of primarily right-of-way on Fair Drive. These two portions of the project site are continuous, and the project site in total is 95 acres. The project site is west of Harbor Boulevard and surrounded to the east, west, and south by the Costa Mesa Country Club. North of the project site are residential uses jointly owned and operated by the California Department of Developmental Services (DDS). The

California Department of General Services (DGS) is in the process of developing the Southern Regional Emergency Operations Center (SREOC) southwest of the project site on a 15-acre portion of the 109-acre FDC facility.

ES.4 SUMMARY OF THE PROPOSED PROJECT

The FDCSP is a specific plan intended to facilitate the development of a mixed-use community on the 95-acre project site. A Specific Plan is a land use tool used to implement a city's general plan. It establishes a link between implementing policies of the general plan and future development for a defined area of the city, which could be a single parcel or multiple properties. The plan itself is a special set of development standards and must be consistent with the city's general plan and zoning code.

The Fairview Developmental Center Specific Plan would be subject to the requirements of SB 82 and SB 188, which direct it to include permanent supportive housing and affordable/mixed-income housing that align with direction provided by DDS and DGS. This specific plan would also implement the City's Housing Element Program 3B.

The proposed land use plan under the FDCSP consists of three major categories of land uses that would be distributed throughout the project site—residential, commercial, and open space. Table ES-1, *FDCSP Land Use Plan Acreage*, shows the anticipated acreages of each land use category under the FDCSP Conceptual Land Use Plan, in addition to space that would be designated for right-of-way.

Table ES-1 FDCSP Land Use Plan Acreage

Land Use Category	Acres
DDS Housing	15
Residential and Commercial	45
Open Space	14
Right-of-Way	21
Total	**95 acres**

To ensure that the proposed project is consistent with the City's General Plan and Zoning Code, the General Plan and Zoning Code will also be amended to reflect the FDCSP.

Buildout of the project site pursuant to the FDCSP would result in an estimated maximum of 9,926 residents and 74 employees at the project site based on a maximum of 4,000 housing units and 35,000 square feet of non-residential development allowed in the FDCSP.

ES.5 SUMMARY OF PROJECT ALTERNATIVES

CEQA Guidelines Section 15126.6(a) states that an EIR must address "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The alternatives in this Draft EIR were based, in part, on their potential to reduce or eliminate the impacts determined to be potentially significant for implementation of the proposed project (see Table ES-2, *Summary of Significant Environmental Impacts and Mitigation Measures*). The project alternatives were not reviewed for financial feasibility. Project alternatives are assessed in further detail in Chapter 4, *Alternatives to the Proposed Project*.

ES.5.1 No Project/No Development Alternative

Under the No Project/No Development Alternative, the FDCSP would not be approved, and the project site would remain in its current condition under State ownership. Without the proposed project's General Plan and zoning amendments, the State would not be able to proceed with the disposition process, including selection of a Master Developer or transfer or lease of the property for redevelopment. The project site would remain subject to the existing Costa Mesa General Plan land use designations and zoning regulations.

As a result, the property would likely remain vacant and underutilized with existing buildings, circulation features, and landscape elements on the project site remaining in place. No new development would occur, this alternative would not result in environmental impacts associated with construction or operation activities, population growth, increased traffic, or additional demand for public services and utilities. As a result, this alternative would avoid or reduce environmental impacts identified for the proposed project but would not meet the proposed project's objectives or statutory requirements for the site.

ES.5.2 No Project (General Plan Buildout/No Specific Plan) Alternative

Under the No Project Alternative, the FDCSP would not be adopted, and no comprehensive planning framework or master developer would guide redevelopment of the project site. However, the project site would still likely be redeveloped over time consistent with applicable State laws, the City's General Plan, and the City's 6th Cycle Housing Element. The City's 6th Cycle Housing Element identifies the project site as a key site capable of accommodating approximately 2,300 residential units to help meet the City's RHNA. Under the No Project Alternative, redevelopment would likely occur through future development proposals reviewed on a project-by-project basis rather than through the coordinated planning framework of the

Specific Plan. Development could occur incrementally and may involve multiple developers rather than a single master developer. This alternative assumes the project site could accommodate approximately 2,300 residential units, consistent with the development capacity identified in the City's Housing Element and would be subject to the same affordable housing requirements as the proposed project. Additionally, this alternative would continue to require the secondary access road through the golf course. A secondary access point at Harbor Boulevard and Harbor Center would still be constructed to adequately serve future residential development.

Environmental impacts under the No Project Alternative would be similar to those associated with the proposed project because the project site would still be redeveloped with residential uses and supporting infrastructure. Impacts related to population growth, vehicle trips, and operational resource demand could be reduced due to the lower number of housing units compared to the proposed project. However, the No Project Alternative would not remove any of the significant and unavoidable impacts identified for the project air quality, historic resources, and greenhouse gases. Impacts to public services and transportation would be reduced compared to the proposed project but remain less than significant. Impacts to land use and planning and recreation would be greater compared to the proposed project but remain less than significant.

ES.5.3 Partial Adaptive Reuse of Historic District Alternative

The Partial Adaptive Reuse of Historic District Alternative proposes preserving select buildings, landscape features, pathways, and campus layout of the existing FDC district during redevelopment. It prioritizes retaining and adapting existing structures based on their condition and safety, while demolishing those that cannot be feasibly rehabilitated. This alternative would still provide 14 acres of open space, consistent with the proposed project, and a secondary access point at Harbor Boulevard and Harbor Center would continue to be included to serve future residents. The overall development capacity would remain consistent with the proposed project's housing objectives, but new buildings may need to be taller or more compact to fit around preserved structures. This approach will help maintain the historic character of the FDC and potentially lessen impacts on cultural resources, although significant impacts, including those related to air quality and greenhouse gases, would lessen but would remain significant impacts.

ES.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. For the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this EIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
5. Whether there are other mitigation measures that should be applied to the project besides the mitigation measures identified in the EIR.
6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

ES.7 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Prior to preparation of the Draft EIR, the City issued a Notice of Preparation (NOP) on October 29, 2025 (see Appendix A). In addition, the City held a public scoping meeting on November 17, 2025, at the City Community Room.

The CEQA-mandated scoping period for this EIR was between October 29, 2025, and December 2, 2025, during which interested agencies and the public could submit comments about the potential environmental impacts of the proposed project. During this time, the City received comment letters from a variety of State and local agencies, several organizations, and members of the public. Appendix A, *Notice of Preparation and Scoping Comments*, of this Draft EIR contains the NOP as well as the comments received by the City in response to the NOP.

The following list includes issues that are likely to be of particular concern to agencies and interested members of the public during the environmental review process. Though every concern applicable to the CEQA process is addressed in this Draft EIR, this list is not exhaustive; rather, it attempts to capture concerns that are likely to generate the greatest interest based on the input received during the scoping process.

- The Native American Heritage Commission summarizes the requirements under AB 52 and SB 18.
- A member of the public commented on and requested analysis of impacts to public services, and transportation, and alternative access points.
- The Supporters Alliance for Environmental Responsibility (SAFER) requests that the City provide notice to the commenter regarding all actions associated with the proposed project.

- The Department of Toxic Substances Control discussed regulatory compliance, requested analysis of hazards and hazardous waste, and provided recommendations in the event contamination is present.
- A member of the public expressed concerns with transportation and suggested an alternative access point.
- The Santa Ana Regional Water Quality Control Board requested regulatory compliance to hydrology and water quality policy and best management practices.
- The Southern California Association of Governments (SCAG's) request that the DEIR summarize SB 375 and SCAG's Connect SoCal goals, evaluate the project's consistency with those goals, incorporate regional growth projections in the growth analysis, and review the Connect SoCal EIR for applicable mitigation measures.
- The California Department of Transportation Supports smart growth and diverse housing and recommends a verity of transportation related strategies.
- The California Department of Fish and Wildlife notes that the proposed open space may be less than required under the site's existing land use designation and that no special-status species or sensitive habitat occur on the site or adjacent golf course.
- The local organization, Costa Mesa First, requested analysis of air quality, biological resources, land use and planning, utilities and service systems, cultural resources, aesthetics, hazards and hazardous waste, greenhouse gas emissions, mineral resources, geology and soils, transportation, noise, land use and planning, cultural resources, tribal cultural resources, energy, hydrology and water quality, utilities and service systems, and project alternatives.
- The Fairview Park Alliance raises concerns about impacts on biological resources, and requests seasonal bird and wildlife surveys and preservation of habitat linkages and migratory corridors.
- A member of the public asked questions related to the project's description, air quality, biological resources, utilities and service systems, hydrology and water quality, public services, transportation, hazards and hazardous waste, and recreation.
- The South Coast Air Quality Management District (South Coast AQMD) requested the DEIR and all air quality-related appendices be sent to South Coast AQMD, and provided recommendations regarding air quality analysis and policy.

ES.8 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-2 summarizes the conclusions of the environmental analysis in this EIR. Impacts are identified as significant or less than significant and mitigation measures are identified for all significant impacts. The level of significance with imposition of the mitigation measures is also presented.

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
AIR QUALITY			
Impact AIR-1: The proposed project would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the South Coast AQMD's AQMP.	Potentially Significant	**Mitigation Measure AIR-1**: All new future development within the Fairview Developmental Center Specific Plan area shall implement the following provisions of the California Green Building Standards Code (CALGreen) as mandatory and not voluntary. The project applicant(s)/developer(s) shall provide documentation (e.g., building plans) of implementation of the applicable measures to the City of Costa Mesa Building Safety Division prior to the issuance of building permits. **Residential Structures with Three or Fewer Stories**. For residential land uses with three or fewer stories, the project developer(s) shall: ▪ Design and build condominium/townhouses dwellings that have an attached private garage to have a dedicated electric circuit to support electric vehicle charging, as outlined in the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.1. ▪ Design and build residential buildings to, at a minimum, meet the Tier 2 electric vehicle parking standards of the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.2.1. ▪ Design and build residential buildings to meet the short- and long-term bicycle parking standards of the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.9. ▪ Design and build residential buildings to meet energy-efficiency requirements of the Residential Voluntary Measures of CALGreen, Division A4.2, Energy Efficiency, as outlined under Section A4.203.1.	Significant and Unavoidable.

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Nonresidential Structures and Residential Structures with Four or More Stories. For nonresidential land uses and residential land uses that are four or more stories, the applicant/developer shall: ▪ Design and build structures to, at a minimum, meet the Tier 2 advanced energy efficiency requirements of the Nonresidential Voluntary Measures of CALGreen, Division A5.2, Energy Efficiency, as outlined under Section A5.203.1.2.2. **Mitigation Measure AIR-2**: For residential and nonresidential land use development projects, the project applicant/developer shall comply with the following: ▪ All major appliances (e.g., dishwashers, refrigerators, clothes washers and dryers, and water heaters) provided/installed shall be EnergyStar certified or of equivalent energy efficiency where applicable. ▪ Installed water heaters shall meet a zero NOX emissions standard. ▪ Installed central furnaces with a Rated Heat Input Capacity less than or equal to 2,000,000 British thermal units (Btu) per hour shall meet a zero NOX emissions standard. ▪ Installed fireplaces shall be electric-powered only. Prior to the issuance of the certificate of occupancy, the City of Costa Mesa Building Safety Division shall verify implementation of these requirements. **Mitigation Measure AIR-3**: For nonresidential land use development projects, prior to issuance of the certificate of occupancy, the property owner shall provide documentation to the City of Costa Mesa Building Safety Division demonstrating enrollment in a 100 percent carbon-free electricity energy plan, such as Southern California Edison's Green Rate program, for proposed project building(s) when feasible. If a 100 percent carbon-free electricity plan is not available, the property owner shall enroll in an energy plan with the next highest carbon-free electricity until a 100 percent carbon-	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		free electricity energy plan becomes available. Measures to achieve 100 percent carbon-free electricity use for the proposed project building(s) may include, but are not limited to, plans for 100 percent renewable electricity. If such carbon-free electricity energy plans are waitlisted, the property owner shall sign up for the waiting list until such time a plan is available.	

Impact AIR-2: Construction activities associated with future development that would be accommodated under the proposed project could generate short-term emissions in exceedance of the South Coast AQMD's threshold criteria.	Potentially Significant	**Mitigation Measure AIR-4**: Prior to discretionary approval by the City of Costa Mesa for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project regional air quality, localized air quality, and health risk impacts from activities to the City of Costa Mesa Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance (South Coast AQMD Air Quality Significance Thresholds Table), the City of Costa Mesa Building Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include:
		▪ Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:
		  ○ Requiring use of nontoxic soil stabilizers to reduce wind erosion.
		  ○ Applying water every four hours to active soil disturbing activities.
		  ○ Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
		▪ Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.
			Significant and Unavoidable.

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards. ▪ Limiting nonessential idling of construction equipment to no more than five consecutive minutes. ▪ Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Department.	
Impact AIR-3: Long-term operation of the proposed project would generate emissions in exceedance of the South Coast AQMD's threshold criteria and cumulatively contribute to the South Coast Air Basin's nonattainment designations.	Potentially Significant	**Mitigation Measure AIR-5:** Mitigation Measures AIR-1 through AIR-3 would apply and would contribute to reduce mobile-source, area-source, and energy sector criteria air pollutant emissions of the proposed project.	Significant and Unavoidable
Impact AIR-4: Construction of the proposed project could expose sensitive receptors to substantial pollutant concentrations.	Potentially Significant	**Mitigation Measure AIR-6:** Construction of projects subject to CEQA on sites of one acre or greater; within 1,000 feet of residential and other sensitive land use projects (e.g., hospitals, schools, nursing homes, day care centers), as measured from the property line of the project to the property line of the source/edge of the sensitive land use; that utilize off-road equipment of 50	Significant and Unavoidable

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		horsepower or more; and with more than 12 months of active construction (i.e., exclusive of interior renovations), shall require preparation of a construction health risk assessment (HRA) prior to future discretionary project approval, as recommended in the current HRA Guidance Manual prepared by the California Office of Environmental Health Hazard Assessment (OEHHA). The construction HRA shall generally be prepared in accordance with policies and procedures of the OEHHA and the South Coast Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the construction HRA shows that the incremental cancer risk exceeds 10 in a million or the appropriate noncancer hazard index exceeds 1.0, the construction HRA shall be required to identify all feasible measures capable of reducing potential cancer and noncancer risks to an acceptable level to the extent feasible (i.e., below 10 in a million or a hazard index of 1.0), including appropriate enforcement mechanisms. The construction health risk assessment shall be submitted to the City for review and approval. Measures identified in the health risk assessment shall be included in grading plans prepared for the development projects. Compliance with these measures shall be verified during regular construction site inspections.	
Impact AIR-5: The proposed project's contribution to cumulative air quality impacts would be cumulatively considerable.	Significant	Implement Mitigation Measures AIR-1 through AIR-6.	Significant and Unavoidable
BIOLOGICAL RESOURCES			

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact BIO-1: Construction of the project site may impact suitable habitat for the Crotch's bumble bee and the western burrowing owl; suitable nesting habitat for the Cooper's hawk and white-tailed kite; and suitable roosting habitat for the western yellow bat and monarch butterfly.	Potentially Significant	**Mitigation Measure BIO-1a**: **Overwintering Monarch Monitoring Surveys and Habitat Management Plan**. A minimum of three overwintering surveys shall be conducted by a qualified biologist familiar with the identification of monarchs and overwintering roosts in order to optimize detection of an overwintering grove; one early-season count between mid-October and mid-November; one midseason count between mid-November and mid-December; and one late-season count between mid-December and mid-January. The survey shall be conducted early in the morning when temperatures are below 55°F and continue beyond cool morning temperatures in order to detect monarchs as they begin to warm and leave the roost. The number of monarchs and the location at each cluster, as well as the number of monarchs observed in flight, shall be recorded in addition to start and end times and conditions. Surveys shall not be conducted during inclement conditions (i.e., heavy precipitation, strong winds, and fog). If the project site is determined to support an overwintering monarch colony—for the purposes of this analysis, defined as greater than or equal to three adult monarch butterflies perched in a single tree during the overwintering season or greater than or equal to five adult monarch butterflies observed in the immediate vicinity of a grove of trees during the overwintering season— a qualified biologist shall prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified monarch biologist. At a minimum, the Monarch Butterfly Overwintering Habitat Management Plan shall include project-specific protection measures, management, enhancement, and restoration elements; restrictions for pesticide use; and restrictions for future plantings of tropical milkweed to reduce pathogens. **Mitigation Measure BIO-1b**: **Focused Crotch's Bumble Bee Surveys**. If CBB are still a candidate for listing or have become a listed species, a minimum of three focused CBB surveys shall be conducted within areas identified as	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		potential CBB nectaring and nesting habitat following the timing and methods described in CDFW's *Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species*. Surveys shall be conducted during the colony active period (April through August) the season prior to Project implementation within the Project Site and a 50-foot buffer during appropriate survey conditions to maximize aboveground detection (daylight hours at least 1 hour after sunrise and two hours before sunset when ambient temperatures are between 60°F to 90°F, sustained winds are less than 8 miles per hour, and when the surveyor's shadow can be seen). Surveys shall focus on detection of CBB at foraging patches and shall be at a level to detect CBB nests. Detection of CBB shall be reported to CDFW prior to start of construction, and, if avoidance cannot be achieved, a CBB Avoidance Plan shall be prepared by a qualified biologist, and an application for an Incidental Take Permit would be necessary. **Mitigation Measure BIO-1c**: **Pre-construction Nesting Bird Surveys.** Whenever feasible, any ground-disturbing activities shall be conducted outside of the breeding season for birds (approximately January 15 through August 31 for raptors and February 1 through September 15 for songbirds). This shall avoid violations of the MBTA and California Fish and Game Code Sections 3503, 3503.5, and 3513. If activities with the potential to disrupt nesting birds are scheduled to occur during the breeding season, a pre-construction survey for nesting birds shall be conducted by a qualified avian biologist who is knowledgeable of the bird species occurring in the region and is experienced surveying for and identifying the common and special-status bird species with potential to occur. The survey shall occur no more than 3 days prior to the start of ground-disturbing activities. The nesting bird survey shall include the project site and adjacent areas (500-foot buffer) where project activities have the potential to cause nest failure. If no nesting birds are observed during the survey, site	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		preparation and construction activities may begin. If nesting birds (including nesting raptors), are found to be present, avoidance or minimization measures shall be undertaken to avoid potential project-related impacts. Measures may include seasonal work restrictions or establishment of a non-disturbance buffer around each active nest until nesting has been completed, as determined through periodic nest monitoring by the qualified avian biologist. The size of the non-disturbance buffer shall be determined by the qualified avian biologist. Typically, this is 300 feet from the nest site in all directions (500 feet is typically recommended by CDFW for listed species and raptors), until the juveniles have fledged and there has been no evidence of a second attempt at nesting. Once nesting is deemed complete by the qualified avian biologist, work may resume within the buffer. Multiple pre-construction nesting bird surveys may need to be conducted to account for different project activities commencing in various areas of the project site or to account for any lapse in project activities during the breeding season. **Mitigation Measure BIO-1d**: **Focused Western Burrowing Owl Breeding Season and Pre-construction Surveys**. Prior to the start of construction, four breeding season surveys for western burrowing owl shall be conducted within areas identified as potential western burrowing owl habitat (the annual brome grassland habitat in the southern portion of the project site) following the timing and methods described in the CDFW's *Staff Report on Burrowing Owl Mitigation*. In accordance with these guidelines, one survey shall be conducted between February 15 and April 15, a minimum of three survey visits, at least three weeks apart, shall be performed between April 15 and July 15, and at least one visit shall be completed after June 15. The surveys shall be conducted by a qualified biologist or team of qualified biologists familiar with the identification of western burrowing owls and owl sign. Pedestrian transects spaced 7 to 20 meters apart shall be walked	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		throughout the annual brome grassland habitat in the southern portion of the project site. The qualified biologist(s) shall scan for owls at the start of each transect and every 100 meters. Surveys shall be conducted under suitable weather conditions and at times that provide the highest opportunity for detection for this species (e.g., between morning civil twilight and 10:00 a.m. or between two hours before sunset until evening civil twilight). Suitable burrows and cavities (e.g., rock cavities, pipes, culverts, and debris piles) 4 inches or greater in diameter detected during surveys shall be examined for western burrowing owl sign (i.e., owl pellets, prints, molting feathers, and abundant insect remains). The locations of all western burrowing owl(s), potentially active burrows, and sign shall be recorded using a GPS device. The results of the survey shall be summarized in a survey report as outlined by CDFW's *Staff Report on Burrowing Owl Mitigation* and submitted to the City, and owl detections shall be reported directly to CDFW through submittal of CNDDB field survey forms within 45 days of completion of all four surveys and prior to project implementation. In addition to focused breeding season surveys, pre-construction surveys for western burrowing owl shall be conducted prior to work beginning within all areas of suitable and marginal habitat identified within the project site, regardless of the time of year that construction is scheduled to begin. Survey methods shall follow those outlined within CDFG's Staff Report on Burrowing Owl Mitigation. The surveys shall be conducted by qualified western burrowing owl biologists who are experienced in surveying for and identifying western burrowing owl individuals and their sign. CDFW recommends that two pre-construction surveys take place: one within 14 to 30 days and the second within 24 hours of the start of ground-disturbing activities (including vegetation removal, clearing and grubbing, and grading, etc.). If western burrowing owl have colonized the project site prior to the initiation of construction, CDFW shall immediately be informed, and consultation with CDFW shall be required prior to initiating ground	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		disturbance. If unavoidable impacts to the species will occur from the project, additional avoidance and minimization measures may need to be implemented, such as seasonal restrictions to work activities, and the appropriate permission from CDFW may need to be obtained prior to the start of project activities. If no western burrowing owl or occupied burrows (with sign) are observed during the pre-construction survey, project activities may commence, and no additional protection measures would be necessary. **Mitigation Measure BIO-1e**: **Bat Habitat Assessment and Bat Management Plan.** Prior to the start of construction, a qualified biologist shall conduct a bat habitat assessment for suitable bat roosting habitat prior to any building demolition or tree-removal activities. The habitat assessment shall be conducted at least one year prior to the initiation of removal/demolition activities. If no suitable roosting habitat is identified, no further measures shall be necessary. If suitable roosting habitat and/or signs of bat use are identified during the assessment, the roosting habitat shall be avoided and consultation with CDFW shall be initiated prior to the commencement of construction activities. A Bat Management Plan shall be prepared and include specific avoidance and minimization measures to reduce impacts to roosting bats. The Project-specific Bat Management Plan may include any of the following, as necessary and appropriate to the findings of the habitat assessment: emergence and/or pre-construction surveys for roosting bats including acoustic monitoring, roost removal timing and methodology, no-disturbance buffers, passive exclusion of bats, and/or species-specific replacement mitigation habitat. If trees scheduled for removal/modification (i.e., trimming) or structures (i.e., culverts) are determined to be suitable for bat roosting, or if work is expected to occur within 100 feet of these areas, these activities shall be scheduled outside of the bat maternity season (generally April 1 through August 31) to the greatest extent feasible. Work activities shall occur between September 1 and February 28/29 or when evening temperatures are not below 45°F and rain is not more than 0.50 inch	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		within 24 hours. If work is expected to occur outside of the bat maternity season (during conditions that meet the parameters described above), work adjacent to bat habitat may continue without additional survey efforts. If trees with suitable bat roosting habitat are scheduled for removal during this time frame, removal using the two-step method shall be conducted: ▪ Vegetation and trees within the area that are not suitable for roosting bats shall be removed first to provide a disturbance that might reduce the likelihood of bats using the habitat. ▪ Two-step tree removal shall occur over 2 consecutive days under the supervision of a qualified bat biologist. On Day 1, small branches and small limbs containing no cavity, crevice, or exfoliating bark habitat on trees (or outer fronds in the case of palm trees), as identified by a qualified bat biologist, shall be removed first, using chainsaws only (i.e., no dozers or backhoes). The following day (Day 2), the remainder of the tree shall be felled/removed. The intention of this method is to disturb the tree with noise, vibration, and branch removal on Day 1, which should cause any potentially present day-roosting bats to abandon the roost tree after they emerge for nighttime foraging. Removing the tree quickly the next consecutive day should avoid reoccupation of the tree by bats. ▪ If tree removal/modification or work within 100 feet of suitable trees or suitable structures must occur during the maternity season, a qualified bat biologist shall conduct a focused emergence survey(s) of the tree(s) within 48 hours of scheduled work. If a maternity roost is located, whether solitary or colonial, that roost shall remain undisturbed until after the maternity season or a qualified biological monitor has determined that the roost is no longer active.	
Impact BIO-2: Construction and operation of the proposed project may have an impact on	Potentially Significant	**Mitigation Measure BIO-2: Aquatic Resources Delineation**. If construction within the Costa Mesa Country Club golf course would disturb the man-made fresh water pond identified in the Biological Resources Technical Report,	Significant and Unavoidable

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
an unknown aquatic resource (potential wetland).		prior to the start of construction, a formal aquatic resources delineation shall be conducted by a qualified biologist to delineate the boundaries of all aquatic features present within the biological reconnaissance survey area for the offsite golf course improvements. The aquatic resources delineation shall be conducted in accordance with the methodology outlined in the USACE "Wetlands Delineation Manual," the "Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region," and "A Field Guide to the Ordinary High Water Mark in the Arid West Region of the Western United States." The delineation shall also comply with the standards required by CDFW and RWQCB. If it is determined that potentially regulated aquatic resources are absent from the golf course site, no other measures shall be recommended. If there are any planned project-related impacts to potential jurisdictional aquatic features, coordination with the agencies (USACE, RWQCB, and/or CDFW) by the permittee shall be initiated. Depending on the nature of project activities, authorization for project impacts may be required, including USACE Section 404, RWQCB Section 401, and/or CDFW Section 1600 permitting. Regulatory agencies may require compensatory mitigation for project impacts through the permit process. Mitigation could take the form of payment of an in-lieu fee, participation in a mitigation banking program, or some form of on-site or off-site restoration. The exact details of mitigation, such as type, location, and mitigation ratio, shall be determined through consultation with the regulatory agencies during the permitting process.	
Impact BIO-3: The construction phase of the proposed project could impact nesting native and	Potentially Significant	**Mitigation Measure**: Implement Mitigation Measure BIO-1c	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
migratory birds and raptors at the project site.			
CULTURAL RESOURCES			
Impact CUL-1: The proposed project would result in a substantial adverse change in the significance of a historical resource due to the removal of historic buildings within the Fairview Developmental Center	Potentially Significant	**Mitigation Measure CUL-1: Historic American Building Survey Recording**. Prior to any ground-disturbing activities or alterations that may impact the Fairview Developmental Center complex, a Historic American Buildings Survey (HABS)-style documentation by a qualified architectural historian shall be required. The documentation shall include a historical narrative, physical description of the historic district, scaled district map, and high-resolution digital photographs. The final documentation shall be submitted to the City of Costa Mesa and a local archive or publicly accessible repository for archival purposes. The final documentation shall be approved by the City prior to demolition of the Fairview Developmental Center, including both the buildings and the walking paths. **Mitigation Measure CUL-2**: **Historic Interpretive Panels**. Following construction of the planned trail on the east side of the Project Area, the Master Developer and/or applicants shall install two interpretive panels along the trail. The panels should contain material documenting the history of the FDC, its place in the broader history of the City of Costa Mesa, and the place of state developmental centers in the general history of the State of California and its people. The two panels should address different topics relevant to the above themes, and should include both pictures and explanatory text. The two panels shall be developed in consultation with the City and a qualified architectural historian. **Mitigation Measure CUL-3**: **Contractor Awareness Training**. The City of Costa Mesa shall ensure that a Contractor Awareness Training Program is delivered to train equipment operators about cultural resources. The program shall be designed to inform construction personnel about: federal and state	Significant and Unavoidable

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		regulations pertaining to cultural resources and tribal cultural resources; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the City of Costa Mesa of any occurrences; project-specific requirements and mitigation measures; and enforcement of penalties and repercussions for non-compliance with the program. The training shall be prepared by a qualified professional archaeologist and may be provided either through a brochure, video, or in-person tailgate meeting, as determined appropriate by the archaeologist. The training shall be provided to all construction supervisors, forepersons, and operators of ground disturbing equipment. All personnel shall be required to sign a training roster. The construction manager is responsible for ensuring that all required personnel receive the training. The Construction Manager shall provide a copy of the signed training roster to the City of Costa Mesa as proof of compliance.	
Impact CUL-2: The proposed project has a moderate to low potential in uncovering pre-contact resources during construction	Potentially Significant	**Mitigation Measure CUL-4: Archaeological Monitoring**. Prior to the start of construction, the Master Developer and/or applicants for new development projects shall retain a qualified professional archaeologist to monitor all ground-disturbing activities associated with project construction. The Monitoring Archaeologist shall meet or work under the direct supervision of someone meeting the Secretary of the Interior's professional qualifications standards for prehistoric and historic archaeology. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 100 feet of any discovery of potential historical or archaeological resources in order to implement mitigation measures to address unanticipated discoveries. **Mitigation Measure CUL-5: Post-review/Unanticipated Discoveries.** If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find: ▪ If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required. ▪ If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under California Environmental Quality Act (CEQA), as defined by CEQA or a historic property under Section 106 National Historic Preservation Act (NHPA), if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction. ▪ If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance. The archaeologist shall notify the Orange County Coroner. The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California Public Resource Code, and Assembly Bill 2641 will be implemented. ▪ If the coroner determines the remains are Native American and not the result of a crime scene, implement Mitigation Measure TCR-3.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact CUL-3: The proposed project has the potential in uncovering cultural resources during construction.	Potentially Significant	Implement Mitigation Measures CUL-4 and CUL-5	Less than Significant
GEOLOGY AND SOILS			
Impact GEO-1: Construction of the proposed project could encounter unique paleontological resources during ground-disturbing activities.	Potentially Significant	**Mitigation Measure GEO-1: Unanticipated Discover of Paleontological Resources**. If paleontological resources (i.e., fossil remains) are discovered during excavation activities, the contractor will notify the City and cease excavation within 50 feet of the find until a qualified paleontological professional can provide an evaluation of the site. The qualified paleontological professional will evaluate the significance of the find and recommend appropriate measures for the disposition of the site (e.g., fossil recovery, curation, data recovery, and/or monitoring). Construction activities may continue on other parts of the construction site while evaluation and treatment of the paleontological resource takes place.	Less than Significant
GREENHOUSE GAS EMISSIONS			
Impact GHG-1: Operation of the proposed project would generate a cumulatively considerable increase in GHG emissions that would exceed the South Coast AQMD Working Group bright-line threshold.	Potentially Significant	**Mitigation Measure GHG-1:** Implement Mitigation Measure AIR-1 through AIR-3	Significant and Unavoidable
Impact GHG-2: The proposed project, together with cumulative projects, would	Significant	Implement Mitigation Measure GHG-1	Significant and Unavoidable

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
result in substantial GHG emissions impacts.			
HAZARDS AND HAZARDOUS MATERIALS			
Impact HAZ-1: The construction phase of the proposed project would create a potentially significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Potentially Significant	**Mitigation Measure HAZ-1a: Soil Screening and Impacted Soil Management.** Prior to and during any demolition, grading, or other ground-disturbing activities, the project applicant shall retain a qualified environmental professional (QEP) to oversee earthwork in areas associated with Recognized Environmental Conditions (RECs), Historic Recognized Environmental Conditions (HRECs), or identified/potential other environmental conditions (OECs). The QEP shall screen disturbed soils for evidence of contamination, including staining, odors, debris, or elevated instrument readings. If suspected contamination is encountered. Impacted soils shall be handled, characterized, and disposed of in compliance with all applicable federal, state, and local regulations. If contamination is confirmed, the project applicant shall notify and obtain oversight from the appropriate regulatory agency, which may include a self-certified local agency, Department of Toxic Substances Control (DTSC), or the Regional Water Quality Control Board based on the nature and extent of the contamination. All required investigation, remediation, and verification activities shall be completed under regulatory oversight before construction activities resume in the affected area. **Mitigation Measure HAZ-1b: Hazardous Building Materials Survey and Abatement.** Prior to demolition of any on-site buildings or structures, the project applicant shall ensure a comprehensive hazardous materials survey is	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Manual. The survey shall identify the presence of asbestos-containing materials, lead-based paint, polychlorinated biphenyls (PCBs), and other hazardous building materials. Identified materials shall be removed and disposed of by licensed abatement contractors in compliance with applicable federal, state, and local regulations. **Mitigation Measure-HAZ-1c: Imported Fill Testing and Approval** If imported fill is required, the project applicant shall ensure that all filling materials are sampled and tested for contaminants consistent with the DTSC PEA Manual. Documentation demonstrating the fill's origin, testing results, and suitability for the intended use shall be submitted to the City for review in coordination with the Orange County Public Works, Development Services (Building & Safety) department and approval prior to importation and placement on the project site.	
Impact HAZ-2: The construction phase of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset or accidental release of hazardous materials.	Potentially Significant	Implement Mitigation Measures HAZ-1a through HAZ-1c.	Less than Significant
Impact HAZ-3: Temporary off-site construction activities along Harbor Boulevard, an established evacuation route,	Potentially Significant	**Mitigation Measure HAZ-2**: Prior to issuance of grading permits, the project applicant and/or their construction contractor shall prepare a Construction Traffic Management Plan to ensure that alternate routes are provided and maintained during temporary road closures or construction activities along Harbor Boulevard. The Construction Traffic Management Plan shall detail	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
could impair emergency response or evacuation access.		construction hours, truck routes, travel patterns for haul routes, traffic detour routes, staging and parking areas, emergency vehicle access provisions, and coordination protocols with local emergency service providers. The plan shall be submitted to the Costa Mesa Public Works Department and the Costa Mesa Fire & Rescue Department for review and approval prior to the start of construction activities. The plan shall also require the construction contractor to implement the following measures during construction activities, which shall be discussed at a pre-grading conference/meeting. ▪ Minimize obstruction of roadways, bikeways, and sidewalks and provide temporary traffic controls, including use of a flag person as appropriate. ▪ Develop a traffic plan to minimize interference of emergency vehicles and personnel from demolition and construction activities (e.g., advance public notice of demolition and construction activities). ○ When emergency responders approach the construction zone with lights and sirens (Code 3) the contractor shall temporarily suspend all construction activity and remove barriers or other obstructions where possible to allow emergency vehicles to pass through the construction zone.	
NOISE			
Impact NOI-1: The proposed project could result in significant temporary increases in noise associated with construction activities.	Potentially Significant	**Mitigation Measure NOI-1**: All future development allowed under the Fairview Developmental Center Specific Plan shall be required to implement the following construction noise control measures: ▪ Unless permitted by the City's Building Safety Division and/or Public Works Department for activities that necessitate nighttime construction, all future development allowed under the Specific Plan shall restrict construction activities to the noise exempt hours established in the City of Costa Mesa Municipal Code, Title 13, Chapter XIII, Section 13-279, which	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		exempts construction noise generated between 7:00 a.m. and 7:00 p.m., Monday through Friday, and 9:00 a.m. to 6:00 p.m. on Saturdays from noise standards. Construction activities associated with all future development shall be prohibited on Sundays and the following federal holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. ▪ All future development allowed under the Specific Plan shall require that all construction equipment, fixed or mobile, be equipped with properly operating and maintained mufflers and other manufacturer recommended noise attenuation devices. ▪ All future development allowed under the Specific Plan shall require that construction equipment be shut off when not in use, to the greatest extent feasible. ▪ All future development allowed under the Specific Plan shall locate construction staging areas, material stockpiles, and stationary construction equipment as far as feasible from existing noise-sensitive receptors. ▪ All future development allowed under the Specific Plan shall, where feasible, position stationary construction equipment so that noise emissions are directed away from nearby noise-sensitive receptors. ▪ All future development allowed under the Specific Plan shall, prior to construction activities that warrant nighttime construction (e.g., infrastructure work, concrete pours, etc.), noise pathway controls shall be installed, including noise barriers and enclosures free from gaps and holes, and placed as close as possible to construction areas by the construction contractor. Temporary noise barriers shall be of sufficient height, a minimum of eight feet tall, to block the direct line-of-sight between the on-site construction areas and off-site noise sensitive	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		receptors and shall be constructed out of wood or other materials with a minimum surface weight of approximately 2.5 pounds per square foot.	
TRANSPORTATION			
Impact T-1: Temporary off-site construction activities on Harbor Boulevard could interfere with emergency response and evacuations.	Potentially Significant	**Mitigation Measure T-1**: The project applicant's construction contractor shall prepare a Traffic Control Plan to ensure that alternate routes are provided and maintained during temporary road closures or construction activities along Harbor Boulevard. The Traffic Control Plan shall detail traffic detour routes, emergency vehicle access provisions, and coordination protocols with local emergency service providers. The plan shall be submitted to the City of Costa Mesa Department of Public Works Department, Costa Mesa Police Department, and Costa Mesa Fire & Rescue for review and approval prior to the start of construction for the roadway improvements on Harbor Boulevard.	Less than Significant
TRIBAL CULTURAL RESOURCES			
Impact TCR-1: Implementation of the proposed project could result in a substantial adverse change to unknown TCRs during ground-disturbing activities.	Potentially Significant	**Mitigation Measure TCR-1**: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. a) Prior to the commencement of any ground disturbing activity at the project site, the Project Applicant shall retain a Native American Monitor, approved by the tribes that consulted on this project pursuant to Assembly Bill AB52 and Senate Bill SB18 (the "Tribe" or the "Consulting Tribe"), which includes the Juaneño Band of Mission Indians – Acjachemen Nation Belardes, Juaneño Band of Mission Indians – Acjachemen Nation 84A, and Gabrieleño Band of Mission Indians – Kizh Nation, and in concurrence with the City of Costa Mesa (City) as the CEQA lead agency. The Project Applicant shall coordinate with the Consulting Tribes to develop an executed contract to pay for a tribal monitor to be present during ground-	Less than Significant

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		disturbing activities. Prior to the issuance of any permit necessary to commence a ground-disturbing activity, a copy of the executed contract shall be submitted to the City of Costa Mesa Economic and Development Services Department. b) The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition and removal of building foundations, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. c) The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered tribal cultural resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc. as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the City upon written request to the Tribe. On-site monitoring shall conclude upon either (1) written confirmation to the Consulting Tribes from a designated point of contact for the City that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Consulting Tribes that	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact TCRs. **Mitigation Measure TCR-2**: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-funerary/Non-ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 100 feet) and shall not resume until the discovered TCR has been fully assessed by the designated tribal monitor and qualified archaeologist (see Mitigation Measures CUL-4). The City and Consulting Tribes shall be notified and all TCRs shall be recovered and retained in the form and/or manner the Consulting Tribes deem appropriate, in the Consulting Tribes' discretion, and for any purpose the Consulting Tribes deems appropriate, including for educational, cultural, and/or historic purposes. **Mitigation Measure TCR-3:** Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects Native American human remains are defined in Public Resource Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, shall be treated according to this statute. a) If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. b) Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		c) If human remains are discovered, the designated qualified archaeologist (see Mitigation Measures CUL-5) shall notify the Consulting Tribes, the City, and the Orange County Coroner. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the California Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the proposed project. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. e) If preservation in place is not feasible, the MLD shall recommend treatment measures for rebury where remains will not be further disturbed. This shall also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located. f) Work may not resume within the no work radius until the City, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	

1. INTRODUCTION

1.1 PURPOSE OF THE EIR

The California Environmental Quality Act (CEQA; Sections 21000 et seq. of the California Public Resources Code [PRC]) requires that all State and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects. This draft environmental impact report (DEIR) has been prepared to satisfy the requirements of CEQA and the CEQA Guidelines (California Code of Regulations [CCR] Title 14, Chapter 3, Sections 15000 et seq.). The EIR is a public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate ways to reduce or avoid environmental damage, and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; significant and irreversible changes; growth-inducing impacts; effects not found to be significant; and significant cumulative impacts of past, present, and reasonably foreseeable future projects.

The lead agency means "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" (PRC Section 21067). The City of Costa Mesa (City) has principal responsibility for approval of the Fairview Developmental Center Specific Plan (proposed project). For this reason, the City is the CEQA lead agency for the proposed project.

The applicant means "a person who proposes to carry out a project which needs a lease, permit, license, certificate, or other entitlement for use or financial assistance from one or more public agencies when that person applies for the governmental approval or assistance" (CEQA Guidelines Section 15351). The City is also the person who proposes to carry out the proposed project. As such, the City is both the applicant and lead agency for the proposed project of preparation of the specific plan. It is anticipated that there will be another applicant/s for the submittal of the proposed FDC site project to comply with the prepared specific plan.

The intent of the DEIR is to provide sufficient information on the potential environmental impacts of the proposed project to allow the lead agency to make an informed decision regarding approval of the proposed project. Specific discretionary actions to be reviewed by the City are described in Chapter 2, *Project Description*, Section 2.7, *Intended Uses of the Draft EIR*.

The overall purpose of this DEIR is to inform the lead agency, responsible agencies, decision makers, and the public about the environmental effects of the construction and operation of

the proposed project. This DEIR addresses effects that may be significant and adverse, evaluates alternatives to the proposed project, and identifies mitigation measures to reduce or avoid adverse effects.

1.2 ENVIRONMENTAL REVIEW PROCESS

1.2.1 Notice of Preparation

The California Code of Regulations (CCR) Title 14, Section 15082 required a minimum 30-day public review period for a Notice of Preparation (NOP). The City circulated the NOP for the proposed project for 38-day public review in order to account for holidays. The NOP circulation began on Wednesday, October 29, 2025, to Friday, December 5, 2025. As a part of the NOP process, the City held a public scoping meeting on Monday, November 17, 2025, from 6:00 p.m. to 8:00 p.m. at Costa Mesa City Hall Community Room at 77 Fair Drive, Costa Mesa, CA, 92626.

Table 1-1, *NOP Comments Summary*, summarizes the written comments received during the NOP comment period. These comments have been considered in the development of the DEIR and inform the scope of environmental topics and analyses presented in this document. A copy of the NOP and copies of the comment letters received during the NOP comment period are available in Appendix A.1 to this DEIR.

During the November 17, 2025, Scoping meeting one comment card was received and four individuals provided oral comments. A summary of the comments applicable to the DEIR are provided below:

- Concerns about the proposed project's impact on biological resources, such as the burrowing owl, and the need to conduct a biological resources study during burrowing owl season (Section 3.3, *Biological Resources*).
- Concerns about how the increase of housing on-site would impact police and fire services and local schools (Section 3.12, *Population and Housing* and Section 3.13*, Public Services*).
- Concerns about the amount of water demand that the project site would generate (Section 3.17, *Utilities and Service Systems*).
- Concerns regarding the expected increases in traffic on local roadways, cut through traffic, and parking (Section 3.15, *Transportation*).
- Concerns regarding the noticing of this project to ensure the community is aware of the project (Appendix A).
- A request that the Costa Mesa parks and recreation department be involved in the planning of the proposed project (Section 3.14, *Recreation*).

- A comment regarding the history of mineral rights of the property (Chapter 5, *Other CEQA Considerations)*.
- A comment regarding noise impacts related to the Southern Region Emergency Operation Center (SREOC) and cumulative impacts with other redevelopment projects (Section 3.11, *Noise*)

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
Native American Heritage Commission (NAHC)	10/30/2025	▪ Summarizes requirements under AB 52 and SB 18.	▪ Section 3.16, *Tribal Cultural Resources*
Todd Schmieder	10/30/2025	▪ EIR should analyze impacts on circulation and public uses on the Costa Mesa Country Club Golf Course ▪ Asks why Merrimac Way has not been considered an access point for the development. ▪ Requests that the EIR consider Merrimac Way as an alternative access point to the proposed project and that the proposed access points instead only be used for emergency access	▪ Section 3.13, *Public Services* ▪ Section 3.15, *Transportation* ▪ Chapter 4, *Alternatives*
Lozeau | Drury LLP, Supporters Alliance for Environmental Responsibility (SAFER)	11/3/2025	▪ Requests that the City provide notice to the commenter regarding all actions associated with the proposed project	N/A
Department of Toxic Substances Control (DTSC)	11/5/2025	▪ Requests that the EIR analyze the potential for historic and future activities to result in the release of hazardous materials at the project site. ▪ Recommends that contamination on the project site be addressed through oversight from a self-certified local agency, DTSC or Regional Water Quality Control Board. Provides information for accessing a DTSC oversight application. ▪ Notes that buildings/structures to be demolished should be surveyed to determine the presence of hazardous materials in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Manual.	▪ Section 5.8, *Hazards, and Hazardous Materials*

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		▪ Notes that imported fill materials be tested for contaminants in accordance with the DTSC's PEA Manual and that the project document the fill's suitability and origin.	
Steve Schaak	11/5/2025	▪ Expresses concern for the project's impact on traffic along Harbor Boulevard and Fair Drive associated with the density proposed. ▪ Suggests that an access point west of the project site be considered to provide more direct access to the nearby schools. ▪ Claims that Fair Drive does not have enough of a setback available to accommodate the project's increase in traffic.	▪ Section 3.15, *Transportation* ▪ Chapter 4, *Alternatives*
Scoping Meeting Comment Card (Troy Snyder)	11/17/2025	▪ Asks how traffic will be handled between the State Route (SR) 55 and the project site. ▪ Asks how traffic and parking will be handled in the existing adjacent neighborhood due to additional developments projects planned along harbor Blvd.	▪ Section 3.15, *Transportation*
Santa Ana Regional Water Quality Control Board	11/20/2025	▪ Requests that the EIR note that the project is subject to the Statewide General Permit for Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4) under existing conditions but would be subject to the Waste Discharge Requirements for the Area-Wide Urban Storm Water Runoff Management Program (the Orange County MS4 Permit) after transfer of the property to the City. ▪ Notes that the stormwater system for the proposed project carries pollutants to the Santa Ana River and that the EIR should address how construction activities would control the	▪ Section 3.9, *Hydrology and Water Quality*

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		flow of pollutants to the Santa Ana River using best management practices. ▪ Requests that the EIR identify possible structural treatment control systems in compliance with the Orange County MS4 Permit, submit a water quality management plan, and consider low-impact development principles during the planning stages of the project. ▪ Requests that the EIR discuss the requirements and coverage under the Construction General Permit	
Southern California Association of Governments (SCAG)	11/21/2025	▪ Summarizes the goals and purpose of SB 375 and SCAG's Regional Transportation Plan/Sustainable Communities Strategy known as Connect SoCal. ▪ Recommends that the EIR include a side-by-side comparison of SCAG goals and subgoals with the proposed project with respect to applicability and consistency. Recommends inclusion of specific DEIR page numbers in the consistency analysis. ▪ Provides SCAG's growth projections for the region and City for assessment of growth impacts. ▪ Recommends that the proposed project review the Connect SoCal EIR and include relevant project-level mitigation measures.	▪ Section 3.10, *Land Use and Planning* ▪ Section 3.12, *Population and Housing*
California Department of Transportation	11/24/2025	▪ Notes that the agency supports smart growth principles and a diversity of housing choices accessible via active transportation.	▪ Section 3.15, *Transportation*

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		▪ Recommends that the project consider installing high visibility crosswalks on all pedestrian crosswalks connecting the project to the surrounding area. ▪ Recommends that the project consider complete street designs on streets surrounding the project area. ▪ Requests that the traffic impact study include a discussion of the project's potential impact on the State's right of way. ▪ Recommends that the project includes housing for a variety of income levels. ▪ Requests that the project increase opportunities for active transportation and transit use including by: installing active transportation infrastructure to/from the project site; wayfinding directional signage to transit stops; and safety measures such as physically separated sidewalks and bike lanes, pedestrian-oriented LED lighting, high-visibility continental crosswalk striping, raised crosswalks, refuge islands, wayfinding signage, and safe connections to existing and proposed bicycle facilities. ▪ Recommends establishing freight pick-up and drop-off times that do not coincide with peak commute hours to reduce passenger vehicle conflicts and congestion for freight. ▪ Recommends designating on-street freight-only parking and delivery time windows so trucks will not resort to double parking. ▪ Recommends that the project consider including Amazon lockers or an equivalent shared drop-off location to help	

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		reduce the amount of driving done by delivery trucks and increase the efficiency of deliveries. ▪ Requests that detour and safety measures are in place to prioritize access and safety of active transportation users and transit users during construction of the project.	
California Department of Fish and Wildlife (CDFW)	12/3/2025	▪ Notes that the open space proposed for the project appears to be less than the amount required under the site's existing land use designation. ▪ Notes that no special status species or sensitive habitat are present on the site or surrounding golf course and that the golf course provides a buffer to the biological resources at Fairview Park.	▪ Chapter 2, *Project Description* ▪ Section 3.14, *Recreation* ▪ Section 3.3, *Biological Resources*
Costa Mesa First	12/5/2025	▪ Claims that the proposed project would result in health risks at nearby facilities, including an affordable housing complex on Joann Street (Census Tract 6059063808), elementary schools, high schools, sports fields, and stadium. ▪ Notes that Fairview Park contains habitat for sensitive species and that the layout of open space and parks in the City is intended to allow ocean air circulation throughout the City. States that the FDC is also a part of this air circulation plan and a migratory corridor. ▪ Requests that the project preserve linkages and migratory corridors and that the EIR study the ecological sensitivity of nearby areas. ▪ Requests that the EIR evaluate how the project is consistent with the environmental measures in the Costa Mesa General Plan.	▪ Section 3.1, *Aesthetics* ▪ Section 3.2, *Air Quality* ▪ Section 3.3, *Biological Resources* ▪ Section 3.4, *Cultural Resources* ▪ Section 3.5, *Energy* ▪ Section 3.7, *Greenhouse Gas Emissions* ▪ Section 3.8, *Hazards and Hazardous Materials* ▪ Section 3.9, *Hydrology and Water Quality*

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		▪ Notes that the City primarily depends on groundwater for its water supply and that increased demand could result in impacts to existing water users. ▪ Notes that the FDC is within a historic district (the Fairview State Hospital Historic District) and that the area was historically used for farming with a small orchard remaining on-site among the buildings. ▪ Suggests that the project maintain existing buildings to the extent possible, including potentially repurposing an existing auditorium on-site as a community theater. ▪ Requests that the EIR study impacts on natural landforms and describe and analyze the allowed building mass, bulk, height, and architectural style of the proposed buildings. ▪ Requests that the EIR study glare and light impacts, including sensitive species. ▪ Requests that renderings, cross-sections, and/or visual simulations be included in the EIR. ▪ Notes that the EIR must include sufficient details about the project and mitigate impacts to the extent possible, including impacts associated with on-site demolition and construction, removal of trees, soil import and export, soil remediation, vehicle trips. ▪ Suggests potential air quality/health risk related mitigation measures. ▪ Requests that the EIR identify and map any easements and mineral/oil/gas/drilling rights held on the property.	▪ Section 3.10, *Land Use and Planning* ▪ Section 3.11, *Noise* ▪ Section 3.15, *Transportation* ▪ Section 3.16, *Tribal Cultural Resources* ▪ Section 3.17, *Utilities and Service Systems* ▪ Chapter 4, *Alternatives* ▪ Chapter 5, *Other CEQA Considerations*

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		▪ Requests that project provide a buffer zone between the project and REOC. ▪ Requests that the EIR describe anticipated changes to natural topography. ▪ Requests that the EIR describe impacts on views from open space areas. ▪ Requests that the EIR describes the project's compatibility with the bulk, scale, materials, or style of surrounding development. ▪ Requests that the EIR describe any economic and social equity benefit programs associated with the project ▪ Requests that the EIR describe any air filtration and climate control systems to be installed as part of the project. ▪ Requests that project conduct a detailed traffic study that notes the number of trucks and equipment and how close truck routes will be to sensitive receptors in disadvantaged communities. ▪ Requests that the EIR identify measures to reduce GHG emissions. ▪ Requests that the EIR identify measures to reduce DPM emissions. ▪ Requests that the EIR identify alternative transportation facilities and traffic control/safety measures. ▪ Requests that the project include low-noise asphalt on truck routes. ▪ Requests that the EIR analyze consistency with land use plans.	

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		▪ Requests that the EIR discuss the site's historic district designation and measures to preserve the site's historic features. ▪ Requests that the EIR identify cultural/tribal cultural resources that will be considered in the analysis and provide appropriate mitigation. ▪ Requests that the EIR describe the consistency of the project's aesthetics with the City's motto: "City of the Arts." ▪ Requests that the project include improvements to vegetation and tree canopy and exclusively plant 36-inch box evergreen trees. ▪ Requests that the EIR address biological resources impacted and consistency with applicable bio resource laws. ▪ Requests that the EIR address irreversible commitment of resources. ▪ Requests that the EIR identify hazardous substances on-site and that they will be used as part of the project and include a plan for containment of hazardous materials in the event of a spill or other accident. ▪ Requests that the EIR describe adherence to green buildings standards. ▪ Requests that the EIR analyze water quality impacts. ▪ Requests that the EIR analyzes utility and solid waste impacts. ▪ Requests that the EIR provide details about the establishment of a community facilities district or other funding mechanism to fund infrastructure associated with the proposed project.	

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		▪ Requests that the EIR clarify the types of future developments that would be subject to ministerial approval under the project and the extent of CEQA review discretionary projects will undergo.	
Farview Park Alliance	12/5/2025	▪ Notes the commenters' concerns regarding the project's impacts on biological resources, particularly the migratory corridor centered around Fairview Park. ▪ Requests that the EIR include bird and wildlife surveys at different times of the year. ▪ Requests that the project preserve linkages and migratory corridors.	▪ Section 3.3, *Biological Resources*
Wendy Leece	12/5/2025	▪ Requests that the EIR detail the projected air quality emissions. ▪ Asks if the density associated with the project would cause more air pollution from traffic. ▪ Notes that sensitive species are present at Fairview Park and asks if there will be mitigation and whether consultants will be hired. ▪ Asks if the project will be designed to accommodate additional electrical needs and if the REOC will require more energy during an emergency. ▪ Asks about the details of the soil remediation process. ▪ Asks if harmful air pollutants will be released because of the project and if precautions will be taken and notice be made. ▪ Asks if the City has communicated with Costa Mesa Water District and if the project will increase water bills for other residents.	▪ Chapter 2, *Project Description* ▪ Section 3.2, *Air Quality* ▪ Section 3.3, *Biological Resources* ▪ Section 3.8, Hazards and Hazardous Materials ▪ Section 3.9, *Hydrology and Water Quality* ▪ Section 3.13, *Public Services* ▪ Section 3.14, *Recreation* ▪ Section 3.15, *Transportation*

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
		▪ Asks how water quality will be affected. ▪ Ask if the developer will pay for the project's infrastructure. ▪ Regarding the REOC, asks what the plan for alarms will be at the site during emergencies and how loud it will be. ▪ Asks how public services will be affected, including whether the hiring of new fire and police department personnel will be required and which station will serve the project. ▪ Asks if the project will be served by buses and trucks. ▪ Asks about the project's emergency evacuation plan, including if streets will be designed to accommodate the load of evacuees. ▪ Asks what material the streets will be paved with. ▪ Asks what the prioritization process will be for applying for a unit within the project. ▪ Asks if dry utilities will be undergrounded. ▪ Asks if the street design will accommodate the load of three garbage trucks serving the community. ▪ Asks if the City soccer field will be involved in the project and if the City will provide recreational programming for the project. ▪ Asks if special recreation rooms available to the public are proposed. ▪ Asks if a helipad is involved with the project. ▪ Asks how many workers will be staffed at the REOC and what their roles will be	▪ Section 3.17, *Utilities and Service Systems*

Table 1-1 NOP Comments Summary

Commenting Agency/Person	Letter Date	Summary of Comments	Issue Addressed In
South Coast Air Quality Management District (South Coast AQMD)	12/5/2025	▪ Requests that a copy of the DEIR and electronic versions of all air quality-related appendices be sent directly to the South Coast AQMD. ▪ Recommends that the lead agency reference the South Coast AQMD's *CEQA Air Quality Handbook* and use CalEEMod. ▪ Recommends that the air quality analysis use South Coast AQMD's adopted significance thresholds for regional and localized impacts. ▪ Requests that the air quality analysis quantify construction and operational emissions and list potential sources of emissions. ▪ Notes that overlapping construction and operational emissions should be combined and compared to the significance thresholds. ▪ Notes that if the project includes stationary sources, South Coast AQMD will become a responsible agency and the project will require permits and review from the South Coast AQMD. ▪ Notes that potential air quality-related mitigation measures can be found in the agency's Air Quality Handbook, the MMRP for the 2022 Air Quality Management Plan, and the Connect SoCal MMRP.	▪ Section 3.2, *Air Quality*
Orange County	12/8/2025	▪ Notes that the County has no comments currently.	N/A

1.2.2 Draft EIR

The scope of the DEIR was determined based on the comments received in response to the NOP. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the DEIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance. The information in Chapter 2, *Project Description*, establishes the basis for analyzing the proposed project-related environmental impacts.

1.2.3 Final EIR Certification

The following section summarizes the environmental impacts associated with implementation of the proposed project, as identified and evaluated in this DEIR:

Impacts Considered Less Than Significant

The DEIR identified the following impacts as less than significant or no impact:

- Aesthetics
- Energy
- Hydrology and Water Quality
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

Potentially Significant Adverse Impacts

The DEIR determined that the following environmental factors have potentially significant impacts if the proposed project is implemented.

- **Impact BIO-1:** Construction of the project site may impact suitable habitat for the Crotch's bumble bee and the western burrowing owl; suitable nesting habitat for the Cooper's hawk and white-tailed kite; and suitable roosting habitat for the western yellow bat and monarch butterfly.
- **Impact BIO-3:** The construction phase of the proposed project could impact nesting native and migratory birds and raptors at the project site.
- **Impact CUL-2:** The proposed project has a moderate to low potential in uncovering pre-contact resources during construction.

- **Impact CUL-3:** The proposed project has the potential in uncovering cultural resources during construction.
- **Impact GEO-1:** Construction of the proposed project could encounter unique paleontological resources during ground-disturbing activities.
- **Impact HAZ-1:** The construction phase of the proposed project would create a potentially significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- **Impact HAZ-2:** The construction phase of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset or accidental release of hazardous materials.
- **Impact HAZ-3:** Temporary off-site construction activities along Harbor Boulevard, an established evacuation route, could impair emergency response or evacuation access.
- **Impact NOI-1:** The proposed project could result in significant temporary increases in noise associated with construction activities.
- **Impact T-1:** Temporary off-site construction activities on Harbor Boulevard could interfere with emergency response and evacuations.
- **Impact TCR-1:** Implementation of the proposed project could result in a substantial adverse change to unknown TCRs during ground-disturbing activities.

Unavoidable Significant Adverse Impacts

This DEIR identifies nine significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. The City must prepare a “statement of overriding considerations” before it can approve the project, attesting that the decision-making body has balanced the benefits of the proposed project against its unavoidable significant environmental effects and has determined that the benefits outweigh the adverse effects, and therefore the adverse effects are considered acceptable.

The impacts that were found in the Draft EIR to be significant and unavoidable are:

- **Impact AIR-1:** The proposed project would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the South Coast AQMD’s AQMP.
- **Impact AIR-2:** Construction activities associated with future development that would be accommodated under the proposed project could generate short-term emissions in exceedance of the South Coast AQMD’s threshold criteria.
- **Impact AIR-3:** Long-term operation of the proposed project would generate emissions in exceedance of the South Coast AQMD’s threshold criteria and cumulatively contribute to the South Coast Air Basin’s nonattainment designations.

- **Impact AIR-4:** Construction of the proposed project could expose sensitive receptors to substantial pollutant concentrations.
- **Impact AIR-5:** The proposed project's contribution to cumulative air quality impacts would be cumulatively considerable.
- **Impact BIO-2:** Construction and operation of the proposed project may have an impact on an unknown aquatic resource (potential wetland).
- **Impact CUL-1:** The proposed project would result in a substantial adverse change in the significance of a historical resource due to the removal of historic buildings within the Fairview Developmental Center.
- **Impact GHG-1:** Operation of the proposed project would generate a cumulatively considerable increase in GHG emissions that would exceed the South Coast AQMD Working Group bright-line threshold.
- **Impact GHG-2:** The proposed project, together with cumulative projects, would result in substantial GHG emissions impacts.

This DEIR is being circulated for public review for a minimum of 45 days. Interested agencies and members of the public are invited to provide written comments on the DEIR to the City address below. Upon completion of the 45-day review period, the City will review all written comments received and prepare written responses for each. A Final EIR will incorporate the received comments, responses to the comments, and any changes to the DEIR that result from comments. The Final EIR will be presented to the City for potential certification as the environmental document for the project. All persons who comment on the DEIR will be notified of the availability of the Final EIR and the date of the City's public hearing.

The DEIR is available to the public for review in person at:

- Costa Mesa City Hall Community Room, 77 Fair Drive, Costa Mesa, CA 92626
- Donald Dungan Library, 1855 Park Ave., Costa Mesa, CA 92627
- Mesa Verde Library, 2969 Mesa Verde Drive, Costa Mesa, CA 92626

In addition, the DEIR is available online at the City of Costa Mesa's website: https://www.costamesaca.gov/government/departments-and-divisions/economic-and-development-services/planning/environmental-notices-and-reports

1.3 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code Section 21081 or adopted a negative declaration pursuant to Section 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or negative declaration.

The Mitigation Monitoring Program for the Fairview Developmental Center Specific Plan will be completed prior to consideration of the project by the City of Costa Mesa City Council.

1.4 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this DEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the City.

- *2015-2035 General Plan*, prepared by City of Costa Mesa, adopted June 21, 2016 and as amended thereafter. https://www.costamesaca.gov/government/departments-and-divisions/economic-and-development-services/planning/general-plan/2015-2035-general-plan.
- *Costa Mesa Municipal Code,* prepared by City of Costa Mesa, June 2025. https://ecode360.com/CO4918.

2. PROJECT DESCRIPTION

2.1 INTRODUCTION

The purpose of this section is to describe the Fairview Developmental Center Specific Plan (proposed project) (FDCSP) to the public, reviewing agencies, and decision makers. This description is provided in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines, which require environmental review of a "project" as defined in Section 15378(a) of the CEQA Guidelines:

"Project," as defined by the CEQA Guidelines, means:

> ... the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)…enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700. (14 Cal. Code of Reg. 15378[a])

2.2 PROJECT TERMS

The following is a summary of the key acronyms and project terms associated with the proposed project. Each of these terms are introduced and defined throughout this chapter of the DEIR in addition to the summary provided in this section:

- **City**: Refers to the City of Costa Mesa in its capacity as the lead agency and applicant of the proposed project, and as the geographical location of the proposed project.
- **FDC**: Refers to the **Farview Developmental Center**, the former Fairview State Hospital that operated from 1959 until its phased closure starting in 2016 and ending in 2025.
- **FDC facility/property**: The 120-acre property operated as the Fairview Developmental Center since 1979. It includes a 109-acre main campus and two off-site facilities each totaling 5.5 acres, the Plant Operations center on Merrimac Way and housing on Mark Lane. Prior to the closure of the FDC, the Mark Lane housing consisted of ten residential units; six of the units provide consumer housing and crisis services, two units were rented to FDC employees, and two units were used for FDC operations (DDS 2016).
- **FDCSP**: Refers to the **Fairview Developmental Center Specific Plan**, which is the proposed project that this DEIR is analyzing.

- **Project site**: A 95-acre portion of the Fairview Developmental Center facility that encompasses the boundaries of the Fairview Developmental Center Specific Plan.
- **DDS**: Refers to the California **Department of Developmental Services**, a State agency responsible for providing services and support to people with intellectual and developmental disabilities. DDS is a responsible agency of the proposed project and will retain ownership of 15 acres of the project site.
- **DGS**: Refers to the California **Department of General Services**, a State agency that serves as the business manager for governmental interests of the State and conducts real estate management and development on behalf of the State. DGS is a responsible agency of the proposed project.
- **Cal OES**: Refers to the **California Governor's Office of Emergency Services**, a State agency responsible for managing disasters and coordinating preparedness, response, recovery, and mitigation efforts for all hazards in the State.
- **SREOC**: Refers to the **Southern Regional Emergency Operations Center**, a separate project being developed on a 15-acre portion of the Fairview Developmental Center property adjacent to the project site that is intended to serve as a hub for emergency management planning efforts under the California Governor's Office of Emergency Services in the Southern California region.
- **SB**: Refers to "**Senate Bill**", which is used throughout this DEIR as shorthand to refer to legislation that originated as bills in the State Senate.
  Of particular importance to the context of the proposed project are three pieces of State legislation, referred to respectively as SB 82, SB 188, and SB 138. Each of these pieces of legislation have been adopted into law within the California Government Code. The Government Code section and year of adoption of these legislations are noted in section 2.3.2, *Legislative Background Related to the Proposed Project.*
- **AB**: refers to "**Assembly Bill**", and is used throughout this DEIR, in a similar way to "SB", to refer to legislation that originated in the State Assembly.
- **SB 138 Housing**: Refers to the housing project being developed by the California Department of Developmental Services at former Plant Operations center on Merrimac Way within the Fairview Developmental Center property adjacent to the existing Harbor Village housing. Under Government Code Section 14670.35(e) (referred to as SB 138), this housing must serve as temporary housing for individuals with complex needs.
- **Housing Element**: A mandatory element within a jurisdiction's General Plan that outlines the jurisdiction's plan for providing housing that meets the needs of multiple income levels over a period of eight years. The City's 6th Cycle Housing Element (adopted in 2022 and revised in 2023) identifies the parcel that includes the 109-acre main campus and 5.5-acre Mark Lane housing of FDC property as a Housing Element Site (referred to in this DEIR as the "FDC Housing Element Site"). However, the 109-acre main campus is the area identified for

housing development in the sites inventory. Housing Element sites are lands within a jurisdiction that have the potential for housing development and can be used to meet the jurisdiction's Regional Housing Needs Allocation (RHNA).

- **CMMC**. Refers to the City of **Costa Mesa Municipal Code**, which is a collection of the laws, ordinances, and regulations enacted and enforced by the City. This includes the citywide zoning, land use, and development standards in Title 13 of the CMMC. The Fairview Developmental Center Specific Plan includes development and design standards specific to development under the proposed project, however, where the Specific Plan is silent on a topic, standards in the CMMC would apply.
- **Buildout**: Refers to the maximum level of development that is allowed to occur under a project, often linked to a "horizon year" during which the project is assumed to be completely developed for the purposes of the environmental analysis. Within this EIR, the proposed project is assumed to be completely developed by 2045 and include up to 4,000 residential units and 35,000 feet of commercial space.
- **Affordable Housing**: Refers to residential dwelling units that are deed-restricted for income qualifying individuals or households. Low-income households earn 80 percent or less of the area median income, while moderate-income households earn between 81 to 120 percent of the area median income. In the context of the proposed project, these units are identified in the City of Costa Mesa's 2021-2029 Housing Element's sites inventory for the Fairview Developmental Center Housing Element Site. These housing units are categorized into four tiers of affordability: very low income, low income, moderate income, and above moderate income, which are defined relative to the area median income of Orange County.
- **Master Developer.** A developer who is in charge of leading and managing the construction of large-scale developments, generally including multiple projects. Under the proposed project, a Master Developer would be chosen by the State to lead the implementation of the proposed project in coordination with the City and State.
- **Permanent Supportive Housing**. Refers to housing which provides housing assistance and supportive services to households in which at least one member lives with a disability.

2.3 PROJECT BACKGROUND

2.3.1 Fairview Developmental Center

The site of the proposed project is the former Fairview Developmental Center (FDC) which opened in 1959 as the Fairview State Hospital and historically provided general acute care, skilled nursing, intermediate care, and acute crisis services for individuals with intellectual and developmental disabilities. It was the third State hospital established in California after World

War II as part of a nationwide effort to provide public mental health institutions to serve those with developmental disabilities.

Originally encompassing approximately 750 acres, the FDC was designed to accommodate 4,125 residents and had an initial bed capacity of 2,622. In 1979, 631 acres of the original 750-acre property were transferred to the City of Costa Mesa, reducing the size of the FDC property to 120 acres. This portion of the FDC property sold to the City was subsequently developed as the Fairview Park and the Costa Mesa Country Club. As of 1979, the FDC facility consisted of the 109-acre main campus housing the majority of the FDC's housing, medical, and recreational facilities, in addition to 5.5 acres of staff housing along Mark Lane and a 5.5-acre Plant Operations center along Merrimac Way, both north of the 109-acre facility.

A majority of former FDC buildings were used as housing for residents and included amenities for residents. These amenities included: an auditorium, auto shop/garage, canteen/lava lounge, central nursing and program services, credit union, police station, farm, fashion center, foster grandparent/senior companion program, greenhouse, ground shop, housekeeping, laundry, library, kitchen and diet office, print shop, school, soccer field, swimming pools, and vocational services. The facility currently comprises 39 buildings constructed between 1953 and 1974. A majority of the FDC buildings are one and two-stories and one building, formerly used for research, training, and administrative operations, is four stories in height. As shown in Figure 2-1, *Existing Site Photographs*, the site is interspersed with open space areas among the low-rise FDC buildings. Under existing conditions, all buildings on the site are vacant.

By January 2016, the population of FDC residents had reduced to 252 permanent residents and the State had begun to initiate closure of the facility (DDS 2016). The California Department of Developmental Services (DDS) issued a closure plan in April 2016 and by December 1, 2025, the facility was fully decommissioned, and all buildings on the 109-acre portion of the facility were vacated. The State has relocated all remaining residents to community-based homes and has acknowledged that it does not intend to follow the traditional State surplus property process for this site. In October 2025, the facility's off-site Plant Operations center on Merrimac Way was demolished in association with a separate DDS housing development plan (see discussion of Senate Bill 138 below). DDS does not plan to redevelop the Mark Lane housing at this time. Prior to its closure in December 2025, the FDC employed 66 employees.



Photo 1 – Alvan H. Goodell Education Center, facing southwest (2019)



Photo 2 – Building P (Residences 32-33), facing southwest (2019)



Photo 3 – Overview of Landscaping Department Building (2023)



Photo 4 – Overview of Residences 21-22 (2023)



Photo 5 – Overview of the Administration Building (2023)



Photo 6 – View of Central Support Area of the FDC main campus (2019)

Source: PlaceWorks 2025.

Figure 2-1
Project Site and Surrounding Area Photographs

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2.3.2 Legislative Background Related to the Proposed Project

Several California state regulations have influenced the development and planned disposition of the FDC. In the late 1960's, the State approved the Lanterman Mental Retardation Services Act of 1969 and subsequent Lanterman Developmental Disabilities Services Act in 1976 which acknowledged the civil liberties of individuals with developmental disabilities and improved facilities that housed them, requiring the facilities to be brought closer to living conditions that resembled a home environment. These bills also established Regional Centers, and as a result lifelong care in large hospitals like the FDC were used less and less. Since the early 2000's, State legislation has recognized, provided money to plan for, and ultimately regulated interim use of and ultimate disposition of these State facilities. The following summarizes bills that directly influenced disposition of the FDC property and creation of the FDCSP:

- **Senate Bill 82 (2015) [Government Code Section 14670.36]**: This bill allows up to 20 acres of the FDC property to be used for new housing for the developmentally disabled, also referred to as "complex needs housing". The potential project permitted by the bill is Mixed-Income State Housing and is formerly known as "Shannon's Mountain." While the bill allows for Permanent Supportive Housing on site, development options include integration with new housing throughout the proposed project.
- **Senate Bill 188 (2022) [Government Code Section 14670.31]**: This bill allocated $3.5 million of State funds to the City to develop a specific plan for the FDC property, and to manage the land use planning process integrated with a disposition process for the property, to be carried out by the California Department of General Services (DGS). The disposition of the property shall provide for affordable housing to the greatest extent feasible and shall be upon terms and conditions the director of DGS deems to be in the best interests of the State. The intent of the legislature is that the FDC property be utilized for a mixed-use development, including mixed-income housing. The development would include and prioritize affordable housing, including at least 200 units of permanent supportive housing, and open space. The proposed project is intended to implement the provisions of this bill.
- **Senate Bill 138 (2023) [Government Code Section 14670.35e]**: This bill authorizes DDS to construct up to three complex needs homes (5 persons per home, 15 people max) that would require 24/7 staffing. The State budget includes up to $10.5 million to construct the homes. These homes would house individuals for up to 18 months before they transition to another community-based setting. The portion of the property that formerly housed the FDC's Plant Operations center was selected as the site for these homes. The property is located within Harbor Village and is not part of the FDCSP area.[1]

[1] At the time of adopting this legislation and SB 188, the site envisioned for the FDCSP included the 120-acre FDC property. As such, the area being developed by DDS pursuant to SB 138 was formerly part of the specific plan area included in SB 188.

The City's 6th Cycle Housing Element, which was adopted February 1, 2022, and revised March 1, 2023, has also played a role in establishing and guiding the land use decisions associated with the proposed project. The Housing Element identified the FDC property as a Housing Element Site that may accommodate 2,300 future residential units. Approximately 40 percent of the residential units projected for this site are intended to meet a portion of the City's Regional Housing Needs Allocation (RHNA) for low- (345 units) and very low-income (575 units) households, as shown in Table 2-1, *FDC Housing Element Site Required RHNA*. As such, Housing Element Program 3B outlines the implementation objectives for the FDC property to accommodate future housing development, as follows:

- **Program 3B: Fairview Development Center – State Property**

  Fairview Development Center, owned by the State of California, is a 109-acre property located at 2501 Harbor Boulevard in Costa Mesa. This property historically housed adults with intellectual and developmental disabilities but is closed and has been identified as surplus property by the State. The City has engaged with the State Department of General Services regarding the future use of the property as a master planned residential/mixed-use community with a substantial affordable housing component and other community amenities.

  The City has been coordinating with the State of California Department of General Services (DGS) for future use of the site. The City is considering various zoning strategies permit the residential densities and development of the acreage identified within the candidate housing sites inventory, while also considering expedited permitting.

  On June 26, 2022, Senate Bill No. 188 was approved by the State Assembly, which authorized the State to enter into an agreement with the City of Costa Mesa for the City to develop a specific plan for the Fairview Developmental Center property. The State appropriated $3.5 Million to the State Department of Development Services for allocation to the City to facilitate disposition of the Fairview Developmental Center property, by amending the general plan of the City and any appropriate planning documents and zoning ordinances, completing any environmental review, and addressing the economic feasibility of future development to be utilized for a mixed-use development, including mixed-income housing. Pursuant to the Senate Bill, the development would include and prioritize affordable housing, including at least 200 units of permanent supportive housing, and open space.

The Housing Element requires that the land use of the FDC Housing Element Site be revised to allow mixed-income residential housing units that were identified to meet the RHNA (2,300 units). If a new land use plan is not established (i.e., the FDCSP), then the City must identify additional sites to accommodate a potential shortfall in residential units from the Site's RHNA.

Table 2-1 FDC Housing Element Site Required RHNA

Income Level	FDC Site Housing Units	Costa Mesa RHNA
Very Low	575	2,919
Low	345	1,794
Moderate	690	2,088
Above Moderate	690	4,959
Total	**2,300**	**11,760**

Source: Costa Mesa 2023

2.3.3 Specific Plan Process

In 2020, the Costa Mesa City Council created an Ad Hoc Committee to advise staff and provide recommendations related to the FDC facility. That same year, the Council adopted a vision for the site supporting approximately 1,500 mixed-use, mixed-income housing units—including workforce, veterans, and permanent supportive housing. The Council directed staff to collaborate with the State to preserve local input and influence over future development decisions and land use outcomes.

The FDC property was identified as one of the largest housing opportunity sites in the City's Housing Element. As noted above, the Housing Element anticipated accommodating approximately 2,300 units on this site and included a specific program directing the City to pursue a Specific Plan for residential development, in partnership with the State. Additionally, in June 2022, the State Legislature approved Government Code Section 14670.31 (SB 188), which provides a framework for the reuse of the FDC property. The legislation codifies a partnership between DGS, DDS, and the City of Costa Mesa, with defined roles for each entity.

While the site is owned and controlled by the State, under this framework, the City is responsible for leading the land use planning process, which includes preparation of a Specific Plan, identifying and defining public benefits, amending the General Plan, updating the zoning regulations, and conducting the CEQA review. Defining key components of the plan-such as affordable housing, open space, and community-serving amenities- is a key effort of the Specific Plan Process and ensures that redevelopment of the site aligns with local priorities and State policy goals. In parallel, the State—through DGS—will lead the property disposition process, as property owner, which will include either sale or lease of the land to a Master Developer, for the purposes of building a project in compliance with the City's Specific Plan. The law also expresses the Legislature's intent that the property be redeveloped as a mixed-use project, prioritizing affordable housing to the greatest extent feasible, including a minimum of 200 units of permanent supportive housing, open space, and housing for individuals with developmental disabilities.

2.4 EXISTING SETTING

2.4.1 Regional Setting

The proposed project is in the City of Costa Mesa, an incorporated city in western Orange County. The City of Costa Mesa is surrounded by other incorporated cities within Orange County, including the City of Irvine, 5.5 miles to the east of the project site; Santa Ana, 6.5 miles to the north; Fountain Valley, 4 miles to the west; Huntington Beach, 4 miles to the southwest; and Newport Beach, 5 miles to the south. Figure 2-2, *Regional Location*, shows the regional setting of the project site.

Major roadways include Adams Avenue, 0.31-mile to the north; Victoria Street, 0.5-mile to the south; Harbor Boulevard, which bounds a portion of the eastern boundary of the project site; and Placentia Avenue, 0.45-mile to the west. Regional access to the project site is provided by Interstate 405 (I-405); State Route 55 (SR-55); SR-1 (Pacific Coast Highway); and SR-73. John Wayne Airport, 2.5 miles northeast of the project site, provides regional, domestic and limited international air service.

2.4.2 Local Setting

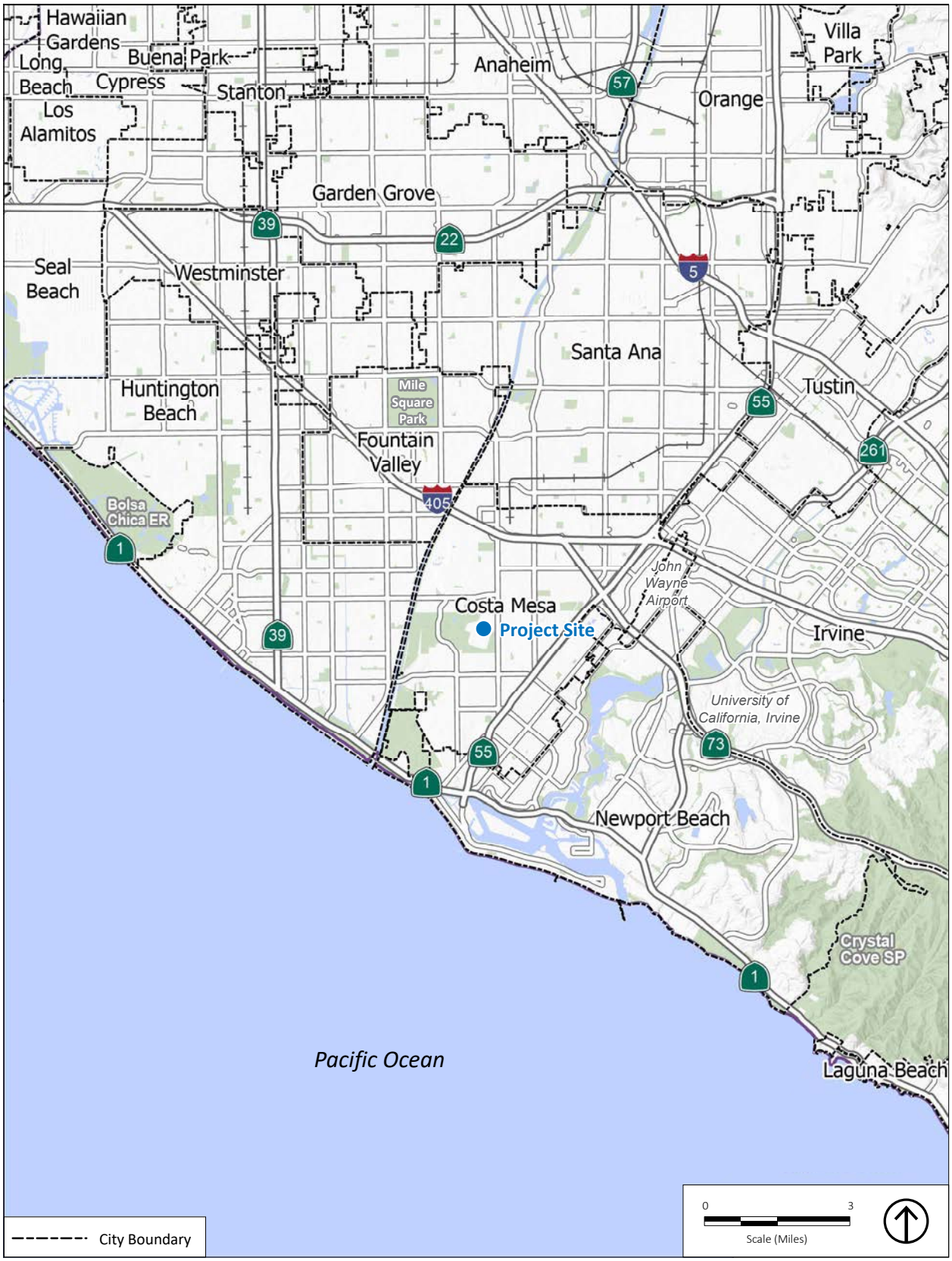
Project Site

The FDCSP covers approximately 93 acres at the 109-acre main campus of the FDC facility at 2501 Harbor Boulevard and 2 acres of primarily right-of-way on Fair Drive. These two portions of the project site are continuous and total 95 acres.

The portion of the project site within the former FDC facility is currently developed with buildings, paved areas, natural grass areas, trees, and ornamental landscaping. The portion surrounding Fair Drive consists of the 3-lane alignment of Fair Drive between its intersection with N Shelley Circle and Harbor Boulevard.

Surrounding Land Uses

The project site is west of Harbor Boulevard and surrounded to the east, west, and south by two golf courses associated with the Costa Mesa Country Club. North of the project site are residential uses jointly owned and operated by DDS. The California Department of General Services (DGS) is in the process of developing the Southern Regional Emergency Operations Center (SREOC) southwest of the project site on a 15-acre portion of the 109-acre FDC facility. Figure 2-3, *Local Vicinity*, shows the local setting of the project site. The following provides further details the land uses in the vicinity of the project site:



Source: Nearmap 2025.

Figure 2-2
Regional Location

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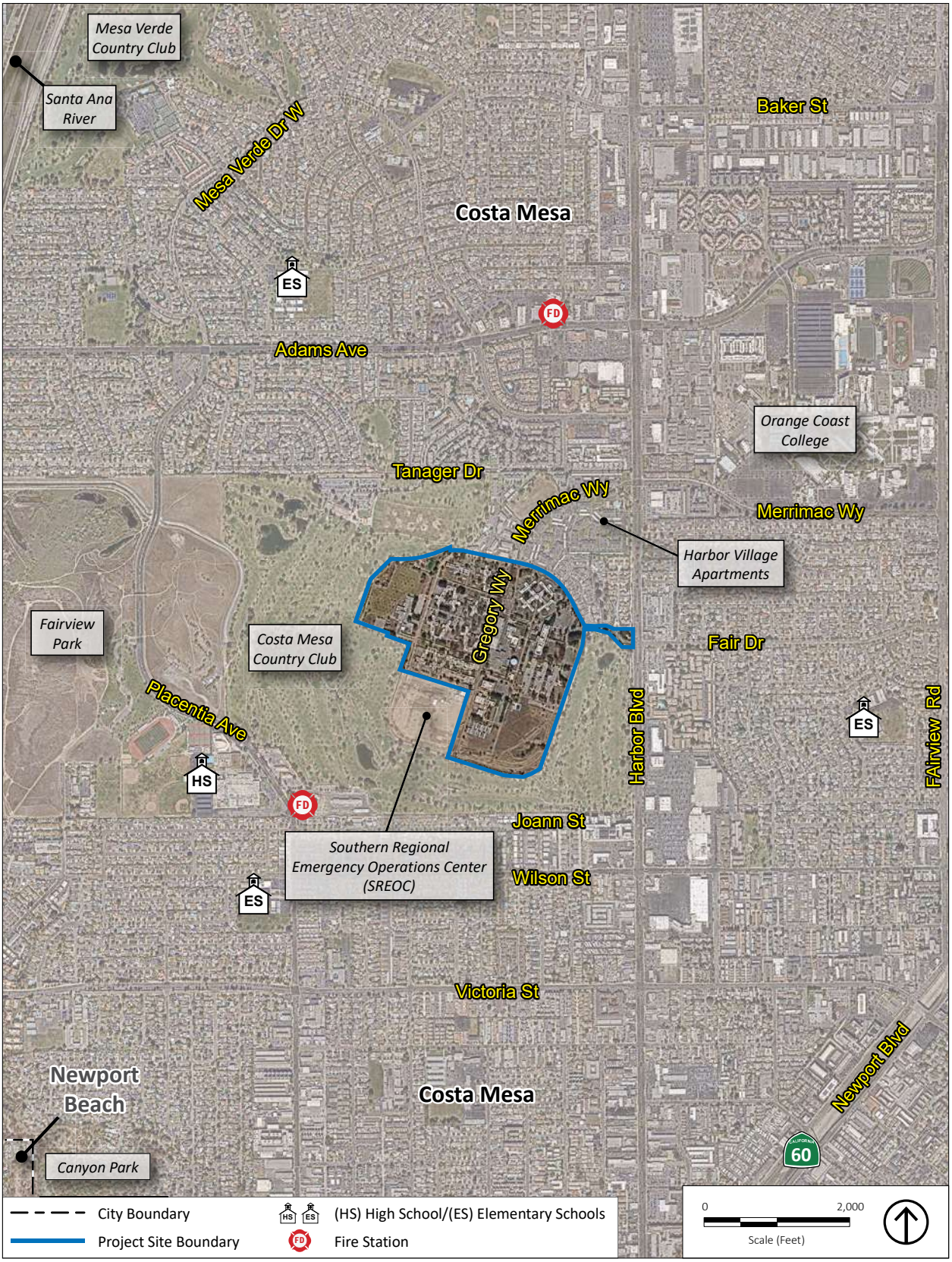

Source: Nearmap 2025.

Figure 2-3
Local Vicinity

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- **Regional Emergency Operations Center (Adjacent to Project Site)**. In December 2023, the California Governor's Office of Emergency Services (Cal OES) approved development of the SREOC on a 15-acre parcel at the southwestern corner of the former FDC facility (see Figure 2-3). The SREOC is intended to serve as a regional hub for emergency management planning and preparation, supporting local agencies with full-time staff and critical coordination services in the Southern California area. The SREOC will include a 39,000-square-foot single-story office building, 21,000-square-foot support warehouse building, 120-foot-tall communications tower, and parking areas with photovoltaic shade canopies.

  Construction of the SREOC began in October 2023 and is expected to be completed by the end of 2027. This facility will be the second emergency operations center in the State, complementing the existing State Operations Center in the City of Mather. The SREOC site is not within the project site or considered a part of the proposed project. The FDCSP includes provisions to ensure that development under the proposed project does not interfere with the operational requirements of the SREOC.
- **Costa Mesa Country Club (East, West and South of Project Site)**. The Costa Mesa County Club is a public golf course that abuts the project site to the northwest, south, southeast, and southwest. The Costa Mesa County Club includes two 18-hole public golf courses—the Los Lagos Course (Par 72, approximately 6,600 yards) and the Mesa Linda Course (Par 70, approximately 5,700 yards). The Los Lagos Course includes wide fairways, large greens, and several water features, while the Mesa Linda Course includes smaller greens and multiple doglegs. Both courses include multiple tee options and are maintained for year-round public use. The Costa Mesa County Club also contains a golf practice facility with 30 night-lit driving range bays (including 10 grass bays), two large putting greens, and a chipping green. The clubhouse includes two banquet and event rooms, the Los Lagos Room and Mesa Linda Room, which accommodate up to approximately 350 and 185 guests, respectively. The facility also includes associated parking areas, landscaping, and outdoor event areas. (CMCC 2025).

  The proposed project would involve off-site improvements adjacent to and within the golf course. Specifically, the secondary access road (explained further in Section 2.6, *Project Characteristics*) would require reconfiguration of the Mesa Linda golf course. The preliminary extent of the off-site improvements and reconfiguration area is shown in Figure 2-4, *Aerial Map*.
- **Residential (North of Project Site)**. Directly northeast and north of the project site is an area comprised of single-family and multi-family residential uses. Two properties in this area are jointly owned by DDS and provide specialized services. Harbor Village, a 39-acre, 564-unit housing complex, provides community care and intermediate care services, in addition to supported living and independent living units. Mark Lane Homes is a complex consisting of ten residential units, including consumer housing, intermediate care facilities, crisis services, staff housing, and other FDC facilities (DDS 2016). The remaining housing in this area is privately owned.

- **SB 138 Housing**: Pursuant to SB 138, DDS in the process of developing a residential housing complex serving adolescents and adults with complex needs at the former Plant Operations site. This project is not a part of the FDCSP project site and it is currently under construction at the drafting of this EIR. It is anticipated to be operational before construction begins on the proposed project.
- **Costa Mesa Corporation Yard (Southwest of Project Site).** The Costa Mesa Corporation Yard is located 0.4-miles southwest of the project site along Placentia Avenue. The facility includes administrative offices, equipment storage, and maintenance areas used by the City of Costa Mesa Public Services Department for the operation and maintenance of municipal infrastructure and public works.
- **Costa Mesa Fire Station 4 (Southwest of Project site)**. This is one of six Costa Mesa Fire Department stations that serve the City. It is located 0.5-miles southwest of the project site and is adjacent to the Costa Mesa Corporation Yard.
- **Estancia High School (Southwest of Project Site)**. Estancia High School is located 0.4-miles southwest of the project site and is the high school for the Estancia Zone of the Newport-Mesa Unified School District. In the 2024-2025 school year the school had 1,030 enrolled students.
- **Fairview Park (West of Project Site).** Fairview Park is located approximately 0.5-miles west of the project site. Fairview Park is the City's largest park, hosting 195 acres of open space and 13 acres of manicured landscape for a total of 208 acres. Within the 195 acres of open space, there are two Nationally Registered Cultural Resource Historic Sites and five distinct habitat ecosystems which are home to rare and endangered plant and animal species. The Fairview Park acts as a regional gateway to the Santa Ana River Trail, the Orange Coast River Park, and adjacent Orange County Talbert Regional Park, offering users multiple passive recreational opportunities such as picnicking, kite flying, wildlife observation, environmental education, and 7 miles of trails for walking or bicycling (Costa Mesa 2025).

Other features in the vicinity of the project site include the Santa Ana River Channel, 1 mile west; Orange Coast College, 0.25-miles east; Wilson Elementary School, 0.40-miles southwest; and Fairview Channel, 0.30-miles west.



Source: Nearmap 2025.

Figure 2-4
Aerial Map

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2.4.3 Existing General Plan Designation and Zoning

Figure 2-5, *Existing General Plan Land Use and Zoning Designations*, shows the existing general plan land use designations and zoning for the project site and surrounding area.

- **General Plan Land Use**. The 93-acre FDC-portion of the project site is designated Multi-Use Center (MUC) under the Costa Mesa General Plan, which allows low- to moderate-intensity urban uses with residential densities ranging from 6 to 40 units per acre and a maximum 0.25 floor-area ratio (FAR) for nonresidential uses. The 2-acre Fair Drive portion of the project site is designated Medium Density Residential, allowing up to 12 units per acre.
- **Zoning.** The zoning of the FDC-portion of the project site is Institutional & Recreational–Multi-Use (I&R-MLT), which permits institutional and recreational uses with a 0.25 FAR, requires a minimum of 25 percent open space, and allows up to 582 dwelling units. The Fair Drive portion of the project site is zoned Planned Development Residential–High Density (PDR-HD), which allows residential development at 20 or more units per acre.

2.5 STATEMENT OF PROJECT OBJECTIVES

The primary purpose of the proposed project is to transform the FDC site into a mixed-use, mixed-income community that helps address the City of Costa Mesa's housing needs while integrating commercial services, open space amenities, and public infrastructure. Pursuant to CEQA Guidelines Section 15124, the following objectives support the proposed project's purpose and assist the City of Costa Mesa in developing a reasonable range of alternatives to be evaluated in this EIR.

1. **Regional Housing Needs.** Contribute to meeting the City's Regional Housing Needs Assessment (RHNA) obligations by providing diverse housing opportunities for very low-, low-, moderate-, and above-moderate-income households.
2. **Promote Inclusive, Mixed-Income Community Development.** Foster a balanced, mixed-use neighborhood that integrates residential, commercial, and community-serving uses to support social, economic, and cultural vitality.
3. **Enhance Open Space and Recreation Access.** Provide accessible parks, trails, and recreational facilities to improve quality of life and encourage active lifestyles for residents and the surrounding community.
4. **Improve Connectivity and Mobility.** Create safe, efficient, multimodal access within the site and to surrounding areas, including pedestrian and bicycle infrastructure, public transit connections, and emergency access.
5. **Optimize Land Use and Community Integration.** Redevelop an underutilized State property into a cohesive, walkable, and well-connected neighborhood that complements surrounding land uses and strengthens community identity.

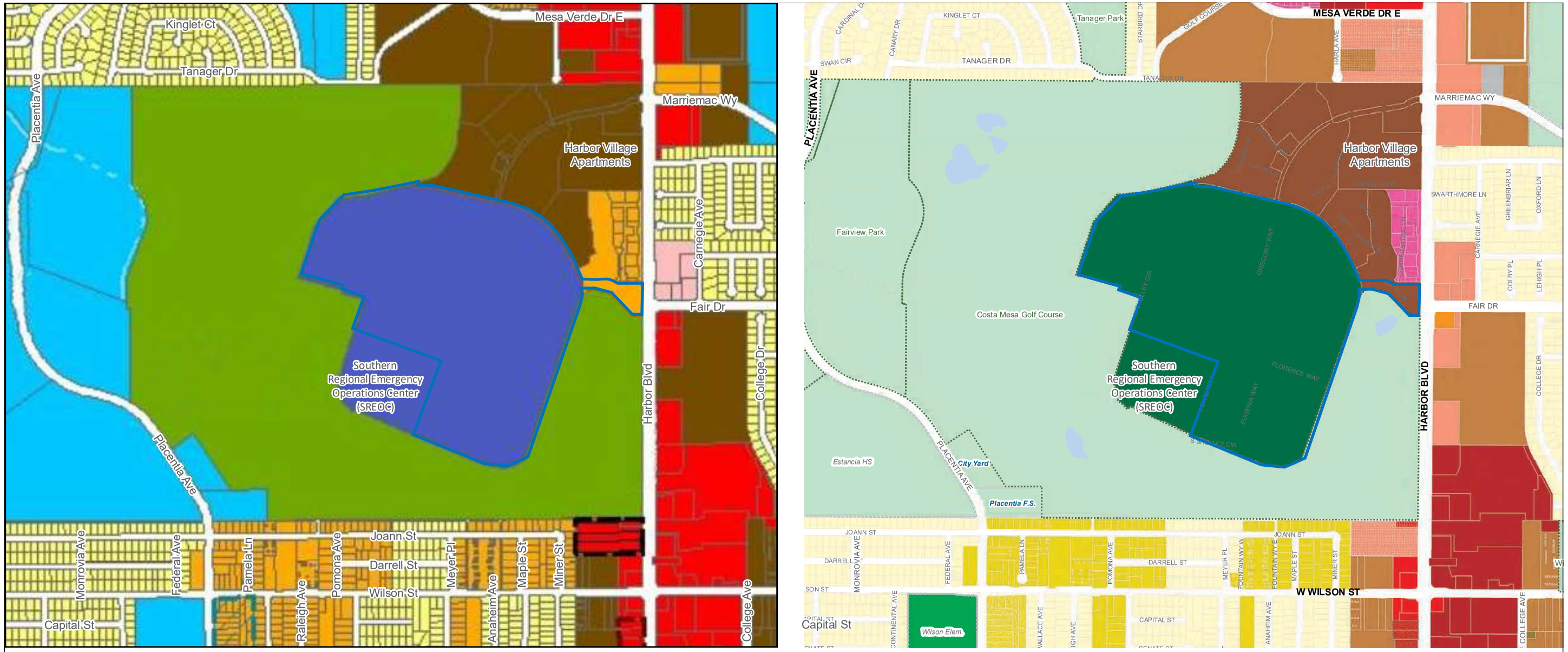
2.6 PROJECT CHARACTERISTICS

The FDCSP is a specific plan intended to facilitate the development of a mixed-use community on the 95-acre project site. A specific plan is a land use tool used to implement a city's general plan. It establishes a link between implementing policies of the general plan and future development for a defined area of the city which could be a single parcel or comprised of multiple properties. The plan itself is a special set of development standards and must be consistent with the city's general plan and zoning code.

In the case of the proposed project, the specific plan would be subject to the stipulations of SB 82 and SB 188, which direct it to include permanent supportive housing and affordable/mixed-income housing that aligns with direction provided by DDS and DGS. This specific plan would also implement the City's Housing Element Program 3B.

The FDCSP is comprised of six chapters. Each chapter covers a topical area and identifies a purpose. Each of these areas cover the statutory requirements for a specific plan in Section 65451 of the Government Code and include the following:

- **Chapter 1 History and Disposition Process**: Documents the history of the Fairview Developmental Center property and state law pertaining to operations and reuse of the site.
- **Chapter 2 Introduction**: Provides existing conditions, purpose, authority and intent of the plan and summarizes the planning process including community outreach.
- **Chapter 3 Vision and Guiding Principles**: Establishes the vision and guiding principles which serve as a guide for this Plan and future development.
- **Chapter 4 Land Use and Urban Design**: Contains the land use plan for the site along with the requirements for permitted uses and development standards such as building height, setbacks, parking, and open space.
- **Chapter 5 Mobility**: Details the circulation plan for the project site, including standards for roadways and trails and provisions for emergency access.
- **Chapter 6 Open Space, Landscaping, and Public Art**: Provides the requirements for common, public, and private open space in addition to landscaping and public art standards.
- **Chapter 7 Infrastructure and Public Services**: Provides information about the improvements that will be required for the redevelopment of the site pursuant to the specific plan and identifies public services that would serve the site.
- **Chapter 8 Administration and Implementation**: Outlines the processes and procedures for development approvals as well as implementation of the plan, including conceptual phasing.



Existing General Plan Land Use

Project Site Boundary

General Plan Land Use

- Low Density Residential (8 du/ac)
- Medium Density Residential (12 du/ac)
- High Density Residential (20 du/ac)
- Multi-Use Center (6 to 40 du/ac)
- Neighborhood Commercial
- General Commercial
- Public Institutional
- Golf Course

Land Use Overlays

- Residential Incentive Overlay (40du/ac)

Urban Plans and Specific Plan

- Mesa West Bluffs Urban Plan

Zoning Designations

Zoning Districts

- R1 - Single-Family Residential
- R2 - MD Multiple-Family Residential, Medium Density
- R-3 - Multiple Family Residential
- PDR-HD - Planned Development Residential - High Density
- PDR-MD - Planned Development Residential - Medium Density
- I&R-MLT - Institutional and Recreational Multi-Use
- I&R - Institutional and Recreational
- I&R-S - Institutional & Recreational - School
- C-1 - Local Business
- C-1S - Shopping Center
- C-2 - General Business

0 875
Scale (Feet)

Source: City of Costa Mesa 2016/2021.

Figure 2-5
Existing General Plan Land Use and Zoning Designations

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2.6.1 Land Use

The FDCSP's Land Use Plan is described in Chapter 4 of the FDCSP. While the locations and specific uses of development under the FDCSP would be implemented by the selected Master Developer, the intent of the FDCSP's Land Use Plan is to provide objectives and standards that ensure the future development aligns with State regulations and guidance, City requirements, and community input. Under this framework, residential uses are considered the prioritized allowed use of the project site. The allowed uses under the FDCSP, as described in Section 4.5 and Table 4-3 of the FDCSP, also include a variety of retail, office, and recreational/event uses geared toward supporting the residential uses under the FDSCP. Uses not listed in Table 4-3 of the FDSCP are considered prohibited unless deemed to be similar in nature to an allowable use, as determined by the Department Director, or designee.

Figure 2-6, *Conceptual Land Use Plan*, provides a conceptual overview of how the three major land use categories under the FDCSP could be distributed across the project site. This Conceptual Land Use Plan does not designate the specific locations of the residential, commercial, and open space development types but instead presents a vision for the site that aligns with the FDCSP's objectives. Once selected, a Master Developer would provide detailed plans that implement the FDCSP in accordance with its development and design standards. The types of development envisioned in these categories include:

- **Residential**. This land use category would accommodate a wide range of housing types, including two-and-three story walk-up townhomes, courtyard or motor-court products, stacked flats, and buildings up to 100 feet in height. It would also allow for a range of senior living options including independent and assisted living. Public and private recreational uses, daycare, and community and neighborhood-serving amenities will also be allowed. 45 acres of this land would be developed as housing or commercial space by the selected Master Developer while 15 acres in the northern portion of the site would be developed by DDS pursuant to SB 82 for developmentally disabled residents. The portion of the FDCSP reserved for DDS's development is separately designated and referred to as "DDS Housing" in Figure 2-6.
- **Commercial**. This land use category is intended to allow for neighborhood-serving retail and service uses in either a stand-alone or mixed-use configuration, including restaurants, coffee shops, small grocery and retail stores, pharmacies, studio and fitness facilities, and small office uses, including medical office. Ancillary community supporting uses, such as day care, are also allowed. This land use designation is flexible and floats across the site depending on the final roadway and open space design. Figure 2-6 depicts possible locations with high visibility and community accessibility that would be ideal for commercial retail uses.
- **Open Space**. This category is intended for various parks and open space uses that are open to the general public, including neighborhood parks, recreation centers and cultural facilities, smaller pocket parks, and trails for pedestrians and bicyclists. Flexibility in the final

location and configuration of publicly accessible open space is provided in the FDCSP, with exception of the Shelley Circle multi-use path. The FDCSP also contains requirements for the provision of private common open space for residential uses.

Table 2-2, *FDCSP Land Use Plan Acreage*, shows the anticipated acreages of each land use category under the FDCSP Conceptual Land Use Plan, in addition to space that would be designated for right-of-way.

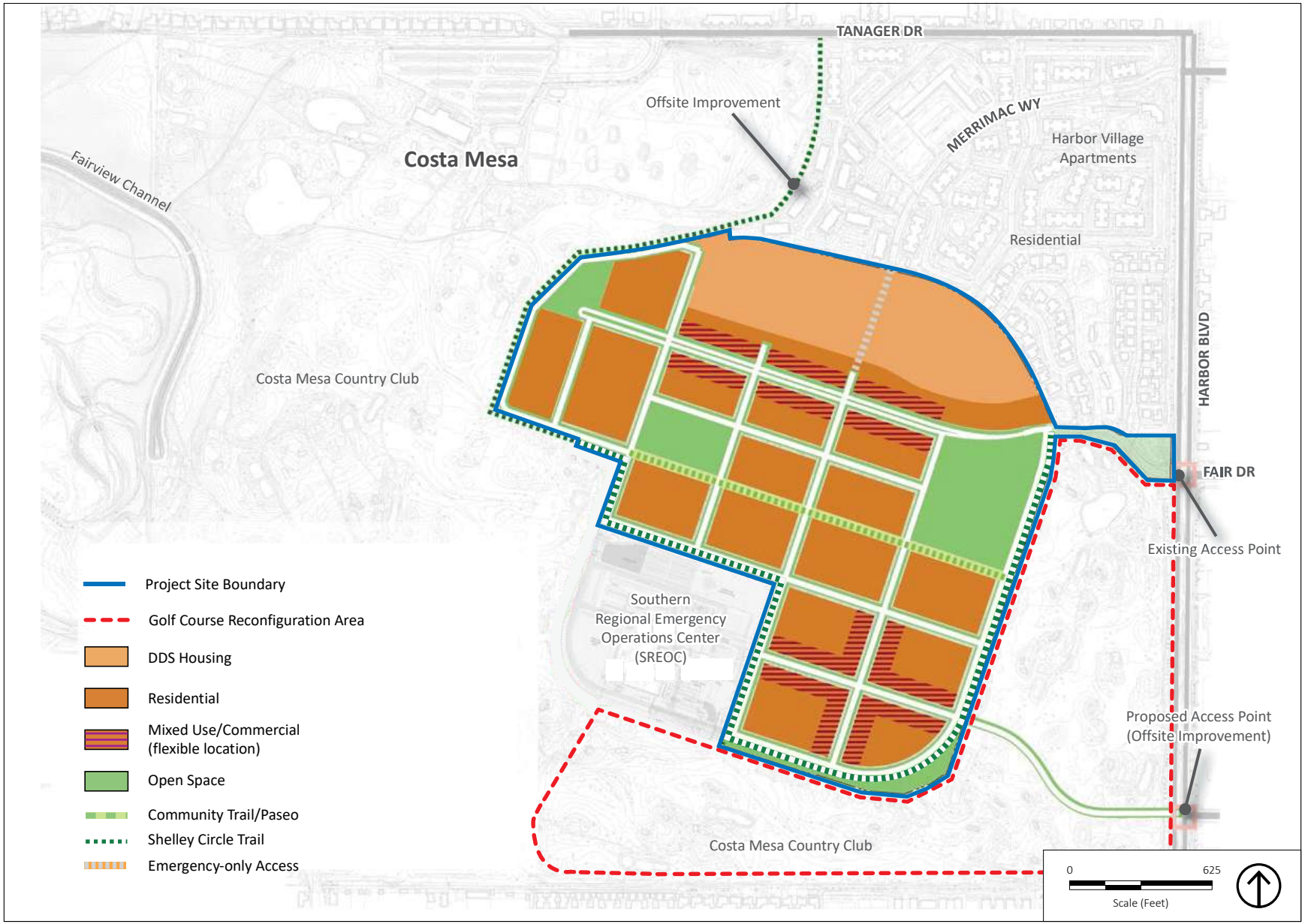
Table 2-2 FDCSP Land Use Plan Acreage

Land Use Category	Acres
DDS Housing	15
Residential and Commercial	45
Open Space	14
Right-of-Way	21
Total	**95 acres**

GENERAL PLAN AMENDMENT & ZONING CODE AMENDMENTS

Concurrent with the adoption of the proposed project, the City would amend the Land Use Element's land use designation for the project site referencing the FDCSP for site specific land use designations and development regulations. The project site's current Multi-use Center land use designation also includes the SREOC site. The Multi-Use Center designation will be removed from the Land Use Element, and the SREOC land use designation will be amended to Public/Institutional, consistent with SREOC uses and operations. The Element must be amended for consistency with the proposed project pursuant to Government Code Section 65454.

To further implement the FDCSP, Title 13 of the Zoning Code of the CMMC would be amended to establish a new Specific Plan chapter. The project site has a current zoning designation of Institutional and Recreational – Multi-Use District (I&R-MLT). This designation will be removed from the Zoning Code and any references to it for consistency with establishing the new chapter. The citywide Zoning Map will be amended according to these updates for consistency purposes, and the SREOC site will be rezoned to Institutional and Recreational (I&R) which is a consistent zoning classification for the Public/Institutional Land Use Designation and does not create conflicts for the SREOC operations.



Source: City of Costa Mesa 2025.

Figure 2-6
Conceptual Land Use Plan

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BUILDOUT

As shown in Table 2-3, *FDCSP Buildout*, buildout of the project site pursuant to the FDCSP would result in a maximum of 9,926 residents and 74 employees at the project site based on a maximum of 4,000 residential housing units and 35,000 square feet of commercial area allowed in the FDCSP. This buildout was informed by the City's 2021-2029 Housing Element, State legislation, and the Market Study summarized in Appendix C of the FDCSP.

Table 2-3 FDCSP Buildout

Land Use	Development Maximum
Residential Units[1]	4,000 units
Population[2]	9,926
Commercial Square Footage	35,000 sf
Employment[3]	74

Notes: sf = square feet

1. This maximum does not preclude additional units allowed under the state density bonus law or other state laws that promote and streamline housing development.

2. Population is based on 2.6 residents per dwelling unit (ACS 2023) for residential units with the exception of the 200 permanent supportive housing units required under SB 188 and the complex needs housing units for the very-low income category that would be developed by DDS under SB 82. Population estimates for the very-low income permanent supportive housing units and complex needs housing units are based on one person per household.

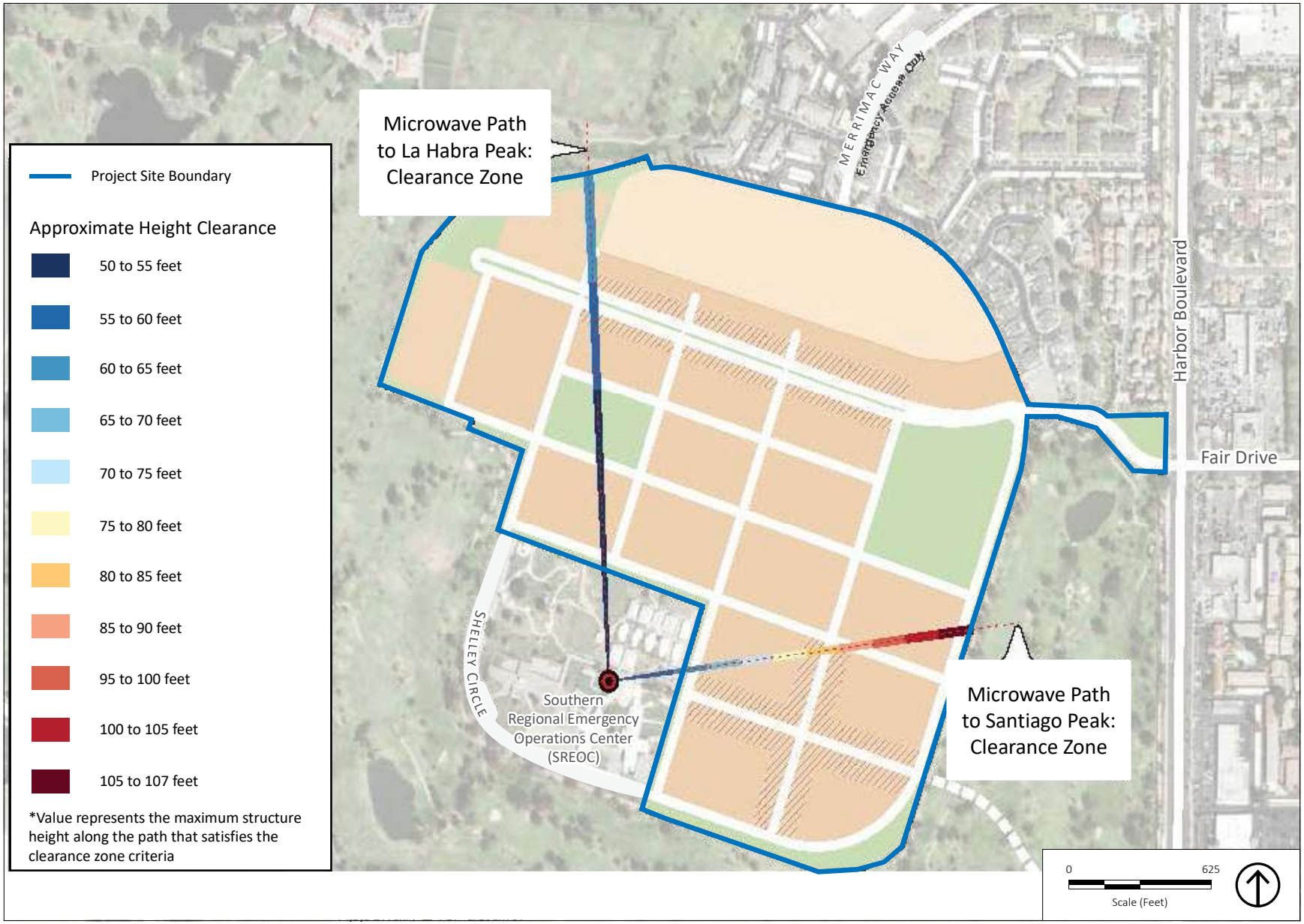
3. Employment is based on 475 square feet per employee and the maximum square footage of buildout of commercial space.

DEVELOPMENT AND DESIGN REGULATIONS

Development and design standards for the project site are listed in Chapter 4 of the FDCSP. These supersede Title 13, Chapter V, Development Standards, of the Costa Mesa Municipal Code (CMMC), or any future citywide design standards. Where the FDCSP is silent on a topic, the CMMC would apply, or any future citywide design standards. The following summarizes the standards addressed in the FDCSP:

- **Building Height**. The allowable building intensities, heights, and massing under the FDCSP is shown in Table 2-4, *Building Form, Scale, and Massing Summary*. Building height across the project site would also be subject to limitations imposed by the communication tower on the SREOC, which would supersede the allowances in Table 2-4. Development within the microwave path of the communication tower would reduce building height or incorporate step-backs to comply with the allowable height. The communication tower requires approximately a width of 30 to 50 feet of clearance at certain height levels for direct line-of-sight communication with other towers, as shown in Figure 2-7, *SREOC Tower Location and Antenna Clearance*.

- **Building Orientation**. The FDCSP requires that all main building entries be oriented toward the Promenade, a street, plaza, paseo or park (see definitions of these streetscape classifications in Section 2.6.3, *Access and Circulation*). Commercial/mixed-use land uses on the corners of intersections shown in Figure 4-5 of the FDCSP would also be required to implement an entry or design feature such as: increased building height at the corner of up to 10 feet; open space in the form of a plaza or entry court; enhanced canopies, awnings, or marquees; and building entries.
- **Setbacks**. The required setback distances for areas within the project site are shown in Table 2-5, *Setbacks*. Within these setbacks the following features are allowed: landscaping, outdoor dining and seating, public-art, pedestrian paths, green infrastructure, lighting, street furniture, public open space, wayfinding signs, bike racks.
- **Frontage**. The portions of buildings facing the street would be subject to design requirements, including use of specific architectural materials, ground-floor activation, and publicly accessible entrances at building corners. The entries of individual dwelling units facing the street would also need to implement a combination of pedestrian access through a courtyard, a grade separation of two feet from the existing grade to the finished floor, and an entry patio, porch, or stoop with enclosure wall.
- **Lighting**. The FDSCP requires that pedestrian-scale lighting be provided along all streets, paseos, open spaces, and building entrances, and that lighting be directed downward and shielded to prevent light spillage.
- **Trash and Utility Enclosures**. All trash enclosures and utility fixtures would be required to be screened from public streets, alleys, and adjacent properties and comply with the requirements of utility providers and the CMMC.
- **Fencing**. Fences and walls on the project site are generally subject to the requirements under Section 13-75 of the CMMC. Perimeter fencing and netting for golf course safety would be installed consistent with the netting used at the **golf course**. Final location for netting shall be approved by the Economic and Development Services Department, who would confer with the golf course operator and developer prior to determining final location.
- **Signage**. A Planned Signing Program would be required during implementation of the FDCSP that establishes the placement and design criteria for all on-site signs. This Program would be subject to the requirements of Section 13-116, Signs Adjacent to Residential Zones, and Section 13-117, Maintenance of Permanent Signs, Article 3, Sign Regulations, of the CMMC.



Source: City of Costa Mesa 2026.

Figure 2-7
SREOC Tower Location and Antenna Clearance

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- **Historic District Requirements**. As discussed in Section 3.4, *Cultural Resources*, of this DEIR, the existing built environment at the project site qualifies as an eligible historic landscape or historic district. The requirements to document the historic district designation include the following, which would also be implemented under Mitigation Measures CUL-1 and CUL-2:
  - Prior to any ground-disturbing activities or alterations that may impact the FDC complex, a Historic American Buildings Survey (HABS)-style documentation shall be completed by a qualified architectural historian. The documentation should include a historical narrative, physical description of the historic district, scaled district map, and high-resolution digital photographs. The final documentation should be submitted to the City and a local archive or publicly accessible repository for archival purposes and should be approved by the City prior to demolition of the FDC.
  - At least two interpretive panels shall be installed along the multi-use trail within the FDCSP area. The panels should contain material documenting the history of the FDC, its place in the broader history of the City of Costa Mesa, and the place of state developmental centers in the general history of the State of California and its people. The two panels should address different topics relevant to the above themes, and should include both pictures and explanatory text.

Table 2-4 Building Form, Scale, and Massing Summary

Standard	Minimum	Maximum
Development Intensity		
Floor Area Ratio (Standalone Commercial)	-	0.40
Floor Area Ratio (Mixed Use)	-	0.25
DDS Housing Density	32 du/ac	-
Building Height[1,2]		
Residential	-	100 feet[3]
DDS Housing	-	50 feet
Mixed Use	-	135 feet
Standalone Commercial	-	35 feet
Ground Floor Height		
Residential	10 feet	-
Mixed Use	12 feet	-
Commercial	25 feet	-
Building Separation		
Primary Buildings	10 feet	-

Notes:

1. Parking structure heights are required to be equal to the height of the building it serves.

2. Building heights shall comply with the height limitation associated with the SREOC communication tower, as shown in Figure 2-7.

3. Maximum height may be exceeded by 35 feet for two buildings.

Table 2-5 Setbacks

Setback Type[1]	Minimum	Maximum
Promenade[2]	5 feet	15 feet
Local Roads[2,3]	10 feet	10 feet
Alley[2]	5 feet	-
Southern Regional Emergency Operations Center[4]	25 feet	-
Golf Course	20 feet	-
Paseo	5 feet	-
Parking Structures[2,5]	5 feet	-

Notes:

1. See definitions of street classifications in Section 2.6.3.
2. Measured from the back of sidewalk
3. Applies to public roads including Shelley Circle
4. Measured from the property line
5. Setback must be landscaped

2.6.2 Affordable Housing

The proposed project is subject to requirements under State legislation and the City's Housing Element to include affordable housing units in the FDCSP. Under SB 82 and SB 188, a portion of the FDC property is to be developed by DGS in consultation with DDS while the remaining portion is developed by a Master Developer pursuant to the FDCSP.

Table 2-6, *Maximum FDCSP Housing Units by RHNA Category*, provides a preliminary estimate of the anticipated or potential distribution of housing units under the FDSCP by income level and developer. While the development pursuant to the FDCSP would be required to provide the number of affordable housing units consistent with the FDC Housing Element Site's RHNA obligation, as shown in Table 2-1, the distribution of affordable units beyond those required by the adopted Housing Element is subject to change based on the Affordable Housing Implementation Plan submitted by the Master Developer (see "Developer Housing" below). The affordable housing may also be subject to the City's inclusionary housing regulations in Title 13, Chapter 17 of the City's Zoning Code.

Table 2-6 Maximum FDCSP Housing Units by RHNA Category

Income Level	DDS Housing	Developer Residential	Total
Very Low	96	479[1]	575
Low	--	345	345
Moderate	384	306	690
Above Moderate	--	2,390	2,390
Total	**480**	**3,520**	**4,000**

Notes: The distribution of housing units across the income categories shown in this table represents a preliminary scenario used for the purposes of this EIR. The distribution of affordable units shown in Table 2-1 for the FDC Housing Element Site presents the required minimum of affordable units for each income category. However, the selected Master Developer may propose an alternative means of compliance with the minimum requirements of Table 2-1 by providing a different mix of very low-, low-, and moderate-income housing as long as the overall number of affordable units is met. Alternatively, the Master Developer may propose a lower number of total affordable units if the mix proposes deeper levels of affordability (e.g. there is an increase in very low- or low-income categories). Compliance would be reviewed as part of the submitted Affordable Housing Implementation Plan and determination made by the Community Development Director or designee.

1. This total includes the 200 Permanent Supportive Housing units required under SB 188. While these units, as shown in this table, are attributed to the Master Developer portion of the FDCSP, the housing developed at the project site by DDS may count toward meeting this requirement.

DDS HOUSING

Under SB 82, up to a 20-acre portion of the FDC property may be developed with affordable housing primarily targeted for people with developmental disabilities for a period not to exceed 55 years. DDS shall determine criteria for qualifying individuals for the housing and a minimum of 20 percent of the housing units developed are required to be available and affordable to individuals with developmental disabilities served by a regional center pursuant to the Lanterman Developmental Disabilities Services Act. Lease revenues or other proceeds received under the leases for this housing are required to be used by DDS to support individuals with developmental disabilities, including subsidizing rents for those individuals. DDS is also required to provide management oversight and administration over the housing sufficient to ensure the purposes of the lease are being carried out and to protect the financial interests of the State.

DEVELOPER HOUSING

SB 188 requires that the FDC property be utilized for a mixed-use development, including mixed-income housing. This law directs the development to include and prioritize affordable housing, including at least 200 units of permanent supportive housing, and open space. Additionally, it notes that priority is to be given to redevelopment concepts that include housing that is deed restricted for individuals with developmental disabilities.

The affordable units developed by the Master Developer may include for-sale and for-rent units. To encourage the provision of for-sale units, the City would consider concessions and incentives

to be negotiated as part of the Development Agreement, including delay of payment of park in-lieu fees until Certificate of Occupancy or reduction in other City fees.

Conformance with the FDCSP requires that the minimum number of affordable housing units per income category is met, as identified in Table 2-1, which would be deed restricted units. The Master Developer would be required to submit an Affordable Housing Implementation Plan detailing how the requirements of the FDCSP would be implemented. This Plan must include but is not limited to the following information:

1. The location, structure, proposed tenure, and size of the proposed market rate and affordable units, including bedroom count.
2. The total number of affordable units to be provided per development application.
3. A floor plan and site plan depicting the location of the affordable units.
4. The applicable affordable income levels for each affordable unit.
5. The mechanisms that will be used to ensure that the affordable units remain affordable for the required term.
6. A fair housing marketing plan for the process by which qualified households will be reviewed and selected to rent or own affordable units.
7. Construction phasing plan schedule with the anticipated completion and opening dates, as applicable within the FDCSP Conceptual Phasing Plan (see Section 2.6.7, *Implementation*).

Upon final project approval, the Master Developer is required to execute and record an affordable housing agreement in a form approved by the City Attorney, prior to approval of any final or parcel map or issuance of any building permit, whichever occurs first, and that at a minimum specifies the number, type, location, size, and phasing of all affordable units, provisions for income certification and screening of potential renters of the affordable units, consistent with the FDCSP. The Master Developer may elect to partner with an affordable housing developer to facilitate the development and management of the affordable units.

2.6.3 Access and Circulation

The FDCSP addresses mobility standards for the project site in Chapter 5. This includes plans for a new internal network of on-street and off-street facilities, a discussion of how existing facilities would be used to provide access to the site, and a description of the new facilities that would be needed to access the site.

SITE ACCESS

The proposed project would include two primary access points: one at Fair Drive on the northeast portion of the project site (existing), and a second at the existing intersection of Harbor Boulevard and Harbor Center connecting to the southeast portion of the project site (proposed). Emergency access would also be provided through Merrimac Way, which is a privately maintained road by the State. The emergency access connection to the project site is anticipated to be gated when not in use. Pedestrian and bicycle access would also be provided at Tanager Drive via a multi-use trail that extends along the eastern, southern and western perimeters of the project site, connecting to Fair Drive at the western end of the project site.

INTERNAL CIRCULATION

Roadway Network

The proposed roadways for the project site include various types of streets to accommodate all modes of transportation. This network is shown in Figure 5-2 of the FDCSP and Figure 3.15-4, *Proposed Roadway Network*, of Section 3.15, *Transportation*, of this DEIR. Street classifications internal to the FDCSP include the following:

- **Promenade**. This roadway would connect from the project's main entry point on Fair Drive and extends to the western edge of the project site. This roadway would accommodate a 100 to 110-foot total right-of-way with two vehicle lanes and sidewalks and parkways on both sides. A Class IV, separated bicycle track would also be provided.
- **Local Roads**. These roadways would form the gridded street pattern of the internal roadway structure with a total right-of-way of 40 to 54 feet. These are envisioned to include two shared vehicle/bicycle lanes (Class III bicycle lanes) and sidewalks on both sides. Off-street shoulder parking would also be permitted on both sides of these roadways.
- **Shelley Circle**. This roadway would connect Fair Drive to the SREOC property around the eastern and southern perimeter of the project site, largely in alignment with the existing Shelley Circle roadway at the project site. This roadway would provide the primary access for SREOC operations with two vehicle lanes and off-street parking on both sides. A sidewalk would be provided on the side of the roadway internal to the project site. A multi-use trail would follow the alignment of this roadway on the other side of the roadway fronting the golf course and continue along the perimeter of the project site connecting to Tanager Drive north of the project site (see discussion of this trail in Section 2.6.5, *Off-Site Improvements*). The total right-of-way width for the roadway would be 58 to 62 feet.
- **Secondary Access**. This roadway, as further discussed in Section 2.6.5, would be required to ensure safe ingress and egress for development of more than 2,300 residential units. This new street is proposed through the golf course connecting to the existing intersection at Harbor Boulevard and the Harbor Shopping Center Driveway aligned with the shopping center east of Harbor Boulevard. This roadway alignment would be finalized with the

selected Master Developer and a redesign and/or reconfiguration of impacted golf course holes would also be required.

The FDCSP does not mandate a specific layout of the roadway network, providing flexibility for the Master Developer to develop a final block layout that aligns with the FDCSP's mobility objectives and the cross-section layouts provided for the roadway classifications in Chapter 5 of the FDCSP. The only exceptions to this are for the paseo and Shelley Circle multi-use trail (see Section 2.6.4, *Open Space*), and the roads that have been identified as backbone roadways, as shown in Figure 2-8, *Backbone Roadway Network*.

Intersections

As further discussed in Section 3.15 of this DEIR, on-site and off-site improvements to existing intersections would be needed to ensure efficient movement of traffic for the proposed buildout of the project. This includes improvements to the intersection of the primary site entrance on Fair Drive at Harbor Boulevard and the intersection at the secondary access point on Harbor Boulevard.

SREOC Access

While development at the SREOC property is not a part of the proposed project, the FDCSP would require the internal circulation network of the project site to accommodate access requirements for SREOC operations. As shown in Figure 2-8, the SREOC would be served by two access points that follow the existing alignment of Shelley Circle Drive. In addition, the intersection of Shelley Circle, as described above with respect to roadway classifications, and Fair Drive, would be subject to large vehicle access requirements to accommodate turning maneuvers of vehicles as long as 60 feet associated with SREOC operations.

Pedestrian and Bicycle Facilities

Pedestrian and bicycle facilities would be required for all roadway classifications of the FDCSP. 8-foot sidewalks would generally be provided on both sides of all roadways internal to the project site while either Classes I, III, or IV bicycle facilities would be provided on all roadways, as shown in Figure 3.15-2, *Existing and Proposed Surrounding Bicycle Network*, in Section 3.15 of this DEIR. Additional pedestrian and bicycle-only facilities would include a central paseo and a separated multi-use trail along Shelley Circle. The bicycle network for the FDCSP consists of on-street and off-street facilities, including Classes I, III, and IV options that would provide connectivity internal to the site and to off-site facilities in the project vicinity. The standards for the paseo and multi-use trail are addressed in Chapter 6 of the FDCSP and summarized below in Section 2.6.4.



Source: City of Costa Mesa 2026.

Figure 2-8
Backbone Roadway Network

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PUBLIC TRANSIT

Public transit access in the project vicinity is provided by the Orange County Transportation Authority (OCTA), which operates Bus Route 43 that stops at Harbor Boulevard and Merrimac Way, Route 47 that stops at Habor Boulevard and Wilson Street, and Route 178 that stops at Habor Boulevard and Adams Avenue. Under buildout of the proposed project, demand for public transit at the project site is anticipated to increase. To ensure this demand is met under the project, the City and Master Developer would work with the OCTA to provide service and/stops within the project site.

PARKING STANDARDS

The parking standards in the FDCSP are intended to support development needs while minimizing visual impacts and reinforcing a pedestrian-oriented environment. Parking is required to adhere to the following standards and meet the minimum space counts shown in Table 2-7, *Parking Requirements*.

Table 2-7 Parking Requirements

Use/Unit Type	Minimum Number of Parking Spaces	Unit
Commercial		
Retail, Office, Food & Beverage[1]	4	1,000 SF
Residential		
Affordable[2]	No minimum	Per Unit
Market Rate Studio and 1 Bedroom	1.25 (includes 0.25 guest)	Per Unit
Market Rate 2 Bedroom+	2.25 (includes 0.25 guest)	Per Unit
Electric Vehicle Charging		
EV Capable	0.10	Per Total Spaces
EV Ready	0.25	Per Total Spaces
Open Space[3]		
Public Parks (including playgrounds)	5	Per Acre
Courts	2	Per Court
Fields	30	Per Field
Bicycle Parking		
Residential	4 per multifamily building	Per Building
Retail and Commercial	5% of required vehicle parking	% of Total Vehicle Spaces
Public Park and Trails	2	Per 0.5 acre of park/trail

Notes: Parking rates may be superseded by State legislation, including AB 2097. SF = square feet

1. Outdoor dining associated with food & beverage establishments are excluded from parking requirements.
2. Affordable includes Very Low, Low, Moderate, Senior, Permanent Supportive, and Special Needs.
3. On-street parking may be used to satisfy and/or contribute to this requirement.

2.6.4 Open Space

The FDCSP provides standards for open space, landscaping, and public art in Chapter 6 of the FDCSP. Landscaping under the FDCSP would conform with Section 13-105 of the CMMC and prioritizes the retention or replacement of existing trees on the project site. The FDSCP provides specific tree preservation, landscaping, hardscape, outdoor furnishings, amenities, and public art standards.

The intent of the FDCSP is to provide flexibility for the distribution and type of open space on the project site while ensuring that it meets the standards provided in the Specific Plan. The FDCSP establishes a public open space standard of 4.26 acres per 1,000 people. Subject to approval by the City's Parks and Community Services Department, this standard can be met by the inclusion of privately or publicly owned, publicly accessible open spaces at the project site, in addition to land dedication, park improvements, and in-lieu fees. However, the proposed project must include a minimum of 14 acres of publicly accessible open space on the project site. Additionally, residential and commercial development types are subject to the following minimum requirements for open space:

- **Residential**. 90 square feet per unit consisting of outdoor/indoor common areas; private open space; and privately owned, publicly accessible open space, such as park areas and plazas.
- **Commercial**. 5,000 square feet for a standalone commercial development.

The following discusses the types of open space under the FDCSP and its related standards.

Common Open Space

Common open space areas would be privately owned and maintained but are shared spaces and can be accessible to the public. Examples include, and are not limited to, courtyards, plazas, pool areas, rooftop decks, and playgrounds. These areas must adhere to the following standards:

- Common or shared open spaces within multifamily projects may be located on roofs, upper decks, parking podiums, or at ground level.
- Common open space shall have a minimum dimension of 15 feet in all directions.
- Indoor common open spaces may include recreation/ fitness facilities, event rooms or gathering areas, shared workspaces, and similar indoor uses.
- Pedestrian walkways shall connect common open spaces to building entrances, private drives, or public streets.

Public Open Space

Public open space areas would be publicly accessible but could be maintained by the City or property owner. Anyone living in the community or visiting the project site would have access. Examples include trails, pedestrian paths, parks, and temporary open spaces such as street closures for a farmer's market. These areas must adhere to the following standards:

- Public open space may be dedicated and owned by the City or privately owned and maintained with a public access agreement, and shall require approval by the Parks and Community Services Department.
- Shall provide dedicated areas for all ages, including children and elderly.
- Shall be consistent with the City's adopted and future updates to the Parks Master Plan.
- Public open space may contain active and/or passive recreational uses.
- Public open space shall include areas dedicated for all ages, including children and elderly.
- A minimum of 14 acres of publicly accessible open space shall be provided within the project site.
- Stand-alone commercial centers shall include a privately owned, publicly accessible gathering area, with outdoor amenities and spaces for dining, socializing, events, and other activities. The minimum size shall be 5,000 square feet.

Public open spaces shall be consistent with any adopted or future adopted Parks Master Plan.

Private Open Space

Private open space areas are private and only accessible to the property owner or lessee. Examples include balconies, enclosed patios and rooftop amenities. These areas must adhere to the following standards:

- Balconies shall have a minimum area of 60 square feet with a minimum dimension of 6 feet in each direction.
- Balconies shall be recessed a minimum of one foot into the building facade.
- No balcony shall overhang the public right-of-way.
- Private patios or porches shall have a minimum area of 80 square feet, shall be contiguous to the unit served, and shall include fencing with a maximum height of 6 feet.
- Rooftop amenities may include shade structures that exceed the building height by 10 feet.

Pedestrian Paths

Pedestrian paths are linear open space for non-vehicular use, located between buildings or blocks, providing walkable connections. These features may be located in a setback area. These features must adhere to the following standards:

- The minimum clear width of a pedestrian path shall be 16 feet.
- Lighting shall be provided consistent with Chapter 4 of the FDCSP.

Paseo

One paseo, generally east–west through the site has been identified in the FDCSP to provide a centralized pedestrian amenity directly in the heart of the community. Different from a trail, this community-centered connection should have buildings or open space on either side. The paseo would have special paving and pedestrian-scaled lighting and provide amenities such as landscaping and/or planters, seating, and possibly public art. The paseo would conform with the following standards:

- Paseos shall be open to the public and designed primarily for pedestrian use.
- Where a paseo is required to provide Fire Department access to buildings with portions located more than 150 feet from an approved fire access point, the minimum clear width shall be increased to 20 feet, as required per California Fire Code.
- Paseos shall connect to streets, open spaces, trails, plazas, and building entrances where feasible.
- Lighting, landscaping, and seating shall be provided to enhance safety and comfort.
- Ground-floor uses adjacent to a paseo shall include active uses, residential entries, common spaces, or patios where feasible.
- Public art shall be implemented, where feasible, as described in Section 6.4 of the FDCSP.

Trails

On-site and off-site trails for active transportation travel would provide connections to the rest of the Costa Mesa community, integrating this new neighborhood with the rest of the City. Existing connections include the Tanager Drive Trail to the north and Joann Street Bicycle Trail to the south. Multi-use trails are encouraged throughout the project site and the final location for many connections would be identified through the Master Developer's site plan application. The Shelley Circle multi-use trail that would follow the eastern, western, and southern perimeter of the project site and extend behind Harbor Village to Tanager Drive is a required feature of the FDCSP (see Figure 2-6).

2.6.5 Off-Site Improvements

The proposed project would result in off-site improvements in the vicinity of the project site. The secondary access road proposed to connect at Harbor Boulevard and Harbor Center shopping center intersection would require construction of a roadway through the adjacent golf course (Costa Mesa Country Club) and is anticipated to reconfigure up to six holes to maintain course operations while meeting circulation and emergency access requirements. The off-site

improvements to accommodate the reconfiguration encompasses approximately 45 acres. The extent of this reconfiguration area is shown in Figure 2-4. The FDCSP includes two street cross-section options for the secondary access road. Both options include two vehicle lanes and Class I multi-use paths on both sides of the roadway. One option includes a decomposed granite walking path, separate from the multi-use paths. The total right-of-way width for the secondary access driveway would be between 58 to 64 feet.

Additionally, the right-of-way of Shelley Circle Trail, which would primarily be internal to the project site, would extend north of the project site between the golf course and residential properties near Harbor Village, connecting to the existing Tanager bike trail on Tanager Drive (see Figure 2-6). The trail would consist of a Class I multi-use path with a total right-of-way between 8 and 10 feet. The trail is anticipated to consist of approximately 4,650 linear feet. This off-site improvement would not require reconfiguration of the golf course holes.

2.6.6 Utilities

Buildout of the FDCSP would require the construction and replacement of new and existing utility infrastructure on the project site. The following discusses the utility improvements anticipated to meet the demand of the proposed project.

DRY UTILITIES

Electricity at FDC property is provided by Southern California Edison (SCE) through a central on-site “power plant” which is distributed through transformers to on-site buildings. Natural gas service at the project site is currently provided by Southern California Gas Company (SoCalGas) and is regulated under a single meter and then distributed across the project site. Under existing conditions, the project site is vacated and does not currently have active electrical or natural gas demand. This existing electrical and gas infrastructure would not be feasible to use and keep on-site, as it would need to be modernized to meet current code requirements. SCE has previously confirmed that it would have capacity to serve the proposed project. It is also anticipated that SoCalGas would remove the existing natural gas facilities on the project site and require a new typical gas service system to support redevelopment.

As such, the proposed project would involve construction of new connections to existing SCE and SoCalGas facilities in adjacent roadways and would include new transformers, distribution lines, and meters to serve the range of housing types and commercial uses. Pursuant to the FDCSP, the Master Developer would coordinate with SCE and SoCalGas to construct the required infrastructure. The FDCSP encourages the proposed project to incorporate a fully electrical design, however, this is not a requirement under the FDCSP.

WASTEWATER AND WASTEWATER TREATMENT

Costa Mesa Sanitary District (CMSD) currently provides wastewater service to the project site. The FDC site currently has private on-site sewer that connects to a CMSD sewer main via a private line in Merrimac Way. The wastewater is conveyed north in the CMSD sewer system to the Orange County Sanitation District (OCSD) trunk sewer facility at Baker Street, where the water is treated and recycled. The project site would require the following wastewater system infrastructure improvements:

- Upsize one of the two parallel existing 15-inch sewer lines from the existing point of connection at Fair Drive to Merrimac Way with an 18-inch line or greater (approximately 1,860 Linear Feet [LF])
- Upsize the 18-inch from Merrimac Way to Baker Street to 21-inch or greater (approximately 4,240 LF)
- Total estimated lineal feet of sewer replacement or upsizing is 6,100 LF

The final size, timing and alignment of the proposed sewer line improvements will be based on the approved site plan, phasing and coordination with CMSD. All project applicants are required to submit detailed information (i.e. Sewer Study) to CMSD regarding product type, size, number of units or square feet, projected demands (indoor and outdoor), and other project details so impacts on the existing sewer system can be managed properly. In those conditions, where hydraulic or capacity impacts affect other service areas or users within CMSD service area, the developer is responsible for paying for the impacts through their connection fees.

The existing onsite sewer system will be demolished during construction of the proposed project, and a new onsite sewer system will be installed to accommodate the flows associated with buildout of the FDCSP. The existing and proposed sewer systems improvements are discussed in further detail in Section 3.17, *Utilities and Service Systems*, of this DEIR. The proposed sewer facilities for the project site are shown in Figure 3.17-4, *Proposed Sewer Facilities*, in Section 3.17.

WATER

Water service in Costa Mesa is provided by the Mesa Water District (MWD), which currently serves the project site. The project site currently receives water from a main water line that runs under Harbor Boulevard, which then enters an on-site system of smaller water lines. The system currently provides service to existing uses and has no major issues in terms of supply, pressure, or fire flows. However, future development would require project-specific evaluation of domestic demand and fire protection needs. Final infrastructure sizing, looping, hydrant spacing, and pressure/flow performance shall be confirmed through detailed engineering and coordination with the MWD and Costa Mesa Fire & Rescue during subsequent planning, mapping, and building permit.

STORMWATER DRAINAGE

The City of Costa Mesa operates and maintains the City's stormwater drainage system. At the project site, the system primarily discharges via surface flow to the Costa Mesa Country Club to the west. Runoff at the golf course is then collected through a network of inlets that lead to the City storm drain systems. Prior to construction of the FDC site, the City will require the following studies and improvements:

- Pipe condition analysis, using closed-circuit television, of the existing 36-inch storm drain that accepts drainage from the project site
- Replacement of the corrugated metal pipe portion of the storm drain with reinforced-concrete pipe.
- Realignment of the 36-inch reinforced-concrete pipe storm drain to avoid the lake
- Future study to determine capacity of the existing 36-inch storm drain
- Balance proposed condition 25-year peak flow to match existing 25-year peak flow including on-site detention if necessary.
- Prepare detailed hydrology & hydraulics report for City review and approval based on the approved tentative tract map.

The stormwater drainage improvements are further discussed in Section 3.17 of this DEIR. The proposed stormwater drainage facilities for the project site are shown in Figure 3.17-5, *Proposed Storm Drain Facilities*, in Section 3.17.

2.6.7 Implementation

SITE PREPARATION

As described in Section 3.8, *Hazards and Hazardous Materials*, of this DEIR, the FDC buildings constructed in the 1950s and 1960s are anticipated to have considerable levels of lead- and asbestos-containing materials that would need to be remediated with demolition. Additionally, the project site contains hazardous materials from the existing utility infrastructure and contaminated soils. For the purposes of this EIR, it is assumed that all existing buildings, parking lots, utilities, walkways, and landscape areas on the project site at the time of the FDC facility's closure in December 2025, would be demolished as part of the proposed project. Prior to beginning demolition, the owner, beneficiary or trustee shall contact the South Coast Air Quality Management District. Additionally, the owner, beneficiary or trustee shall provide an Erosion Control Plan which addresses Best Management Practices. It is anticipated that these efforts in addition to grading, will adequately prepare the site for new development.

PROJECT PHASING

For the purposes of this EIR, it is assumed that construction for the maximum buildout allowed pursuant to the proposed project would occur over a period of up to 18 years, with full buildout of the proposed project finishing in year 2045. Also, for the purpose of this EIR construction is anticipated to begin in 2027. It would include remediation, demolition and removal of hardscapes and existing buildings, grading and excavation, trenching for site utilities and irrigation, building construction, architectural coatings, driveway and walkway construction, landscaping, signage, and street connection improvements.

CONDITIONS AND REQUIREMENTS DURING CONSTRUCTION

As required under the FDCSP, all portions of the project site would be subject to the following operational standards. Any vacant land or portions of the project site under active construction, including demolition, grading and excavation, and above-ground building activities, shall be maintained in a visually attractive manner with the following criteria, including:

- **Fencing**. The owner, beneficiary or trustee shall install a minimum six-foot high chain link fence with dust control covers adjacent to the property boundaries, or other alternative fencing acceptable to the City's Building Official or Code Enforcement Manager that is adequate to protect the public health, and welfare, unless the City officials determine that the installation of such fencing will be detrimental to the public safety and welfare.
  - Any fencing required under this section may additionally require screening if deemed necessary in order to protect the safety, adjacent properties from dust, streetscape and overall appearance of the site. The Building Official or Code Enforcement Manager may enforce fencing standards for vacant areas consistent with this section.
  - If fencing is proposed for long-term vacant sites (for example, vacancy anticipated for more than 12 months vs. active construction sites) with no berms, then fencing shall be permanently installed into the ground and set back three feet to provide for landscaping to be installed and maintained in the front.
  - Any decorative or graphic elements on fencing must be approved by the City and shall not contain any advertising.
- **Screening**. Screening shall be provided at all temporary chain link fencing and shall include graphics and visuals that promote the project and the City of Costa Mesa.
- **Stormwater**. A stormwater pollution prevention plan shall be approved by the Public Works Division and Best Management Practices must be effectively implemented at all times to prevent soil, debris or runoff from affecting right-of-way through erosion or other means.
- **Storage**. Open storage is prohibited on a vacant lot or site within the project site. Vehicle storage such as cars, trucks, vans, motorcycles and buses is not permitted. Vacant lots are permitted to be used for construction staging, construction parking, and site security trailers while any portion of the site is under construction.

- **Property Maintenance**. The project site shall be kept clear of debris, litter, rubbish, overgrown weeds, graffiti, and other elements that contribute toward blight.
- **Lighting**. Exterior security lighting shall illuminate areas with visibility from a street or alley, however, the lights shall be shielded to avoid lighting adjacent properties.

DEVELOPMENT IMPACT FEES

A future FDCSP impact fee program may be initiated in addition to citywide development impact fees. Development impact fees are a potential funding source for maintenance of parks, recreational open space, public services and other services that impact City resources. These fees will be paid by the selected Master Developer and may only be used to pay for improvements necessitated by implementation of the FDCSP and only in an amount proportionate to the new development's share of the benefit. The fees can be combined with other funding sources to pay for an improvement that serves both new and existing residents or businesses. A nexus study—which calculates the new increment of development, estimates the portion of an improvement project attributable to that increment of growth, and allocates the fee for the FDC—is required by state law for implementation.

FIRE AND POLICE PROTECTION SERVICES

Buildout under the FDCSP is anticipated to increase demand for public safety services including fire and police protection. The FDCSP does not identify or propose new public safety facilities but also does not preclude the siting of these facilities or support functions, including a new substation for police and/or fire department services at the project site. If a future need is identified, such facilities would be accommodated, consistent with applicable City review and implementation actions.

Additionally, the Master Developer would coordinate with Costa Mesa Fire & Rescue and applicable agencies to confirm emergency access, fire lane geometry, turning radii, vertical clearances, hydrant spacing, and required fire flows under implementation of the proposed project. Project phasing shall incorporate any identified fire protection improvements needed to maintain effective emergency response and public safety up to and including the placement of a fire station on-site or another acceptable location.

2.7 INTENDED USES OF THE EIR

This is a Program DEIR that examines the environmental impacts of the proposed project. This DEIR also addresses various actions by the City of Costa Mesa to approve and implement the proposed project. It is the intent of this DEIR to evaluate the environmental impacts of the proposed project, thereby enabling the City of Costa Mesa, other responsible and/or trustee agencies, and interested parties to make informed decisions with respect to the requested

entitlements. The anticipated discretionary actions required for this project are listed in Table 2-8, *Actions Required*.

Additionally, pursuant to CEQA Guidelines Section 15168(c), Use with Later Activities, of the CEQA Guidelines, later activities in the program, such as those implementing the FDCSP, can be approved as being within the scope of the project covered by this EIR and associated Mitigation Monitoring and Reporting Program, and no new environmental document would be required, pursuant to CEQA Guidelines Section 15162. If a later activity causes substantial changes or would have effects that were not examined in the Program EIR, a new initial study would need to be prepared, leading to either an EIR or a Negative Declaration. That later analysis may tier from the Program EIR as provided in CEQA Guidelines Section 15152.

2.7.1 Required Permits and Approvals

The City of Costa Mesa is the lead agency under CEQA and has the approval authority over the proposed project. Discretionary actions for the proposed project include: (1) approval of the proposed project, (2) certification of the environmental impact report, (3) adoption of the mitigation monitoring and reporting program, and (4) adoption of the findings of fact and statement of overriding considerations. The anticipated discretionary actions required for this proposed project are identified in Table 2-8 in no particular order, and the list of actions is not intended to be an exhaustive list. Additional actions and applications relevant to implementing components of the FDCSP are shown in Table 8-1 of the FDCSP.

Table 2-8 Actions Required

Lead Agency	Action
City of Costa Mesa	▪ Amendment to the City of Costa Mesa Zoning Ordinance and Zoning Map ▪ Amendment to the City of Costa Mesa General Plan ▪ Adoption of the FDCSP ▪ Certification and Adoption of the EIR ▪ Adoption of the Mitigation Monitoring and Reporting Program ▪ Adoption of the Findings of Fact and Statement of Overriding Considerations ▪ Approval of Development Agreement with Master Developer ▪ Adoption of Final Tract Map ▪ Costa Mesa Fire & Rescue review and approval of fire protection measures, including access, fire lanes, and hydrant placement ▪ Review and approval of roadway improvements through Public Works

Table 2-8 Actions Required

Responsible Agencies	Action
Orange County Health Department	Review of health-related elements such as potable water systems, food service facilities, and sanitation standards.
Department of Development Services	Will oversee the property disposition, transfer, and redevelopment activities under the proposed project and ensure compliance with State policies governing surplus property and redevelopment of former State facilities.
California Department of General Services (DGS)	Will oversee the property disposition, transfer, and redevelopment activities under the proposed project and ensure compliance with State policies governing surplus property and redevelopment of former State facilities.
California Geological Survey (CGS)	Geotechnical review to ensure seismic and soil stability compliance, if applicable.
California Department of Toxic Substances Control (DTSC)	Review and approval (i.e. issuance of a no further action letter) of the preliminary endangerment assessment.
Santa Ana Regional Water Quality Control Board (Santa Ana RWQCB)	Coverage under the General Construction Permit, including preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP).
South Coast Air Quality Management District (SCAQMD)	Review and issuance of Permits to Operate for stationary emergency backup generators and other equipment subject to air quality permitting requirements.
Federal Aviation Administration (FAA)	Review and determination of compliance with height restrictions and airspace safety requirements, as applicable (e.g., communications tower or other vertical structures).

2.7.2 Related Review and Consultation Requirements

In accordance with the California Environmental Quality Act (CEQA), the proposed has complied with the consultation and review requirements for tribal cultural resources. Because the project involves adoption of a Specific Plan, it is subject to both AB 52 and SB 18 consultation requirements.

AB 52 (California Government Code Section 65352.3 and Public Resources Code Sections 21073 and 21080.3.1) requires consultation with California Native American tribes that are traditionally and culturally affiliated with the project area and have requested to be notified of projects within their geographic area of interest. The City of Costa Mesa, as Lead Agency, has provided formal notification to all tribes identified by the California Native American Heritage Commission (NAHC) as having traditional lands or cultural affiliations with the project area. Where requested, the City has engaged in formal consultation with tribes to discuss potential

impacts to tribal cultural resources and has considered measures to avoid, minimize, or mitigate any identified impacts.

SB 18 (Government Code Sections 65352 and 65352.3) requires local governments to consult with California Native American tribes prior to the adoption or amendment of a general plan or specific plan to protect traditional tribal cultural places, sacred sites, and other culturally significant resources. The City has provided written notice to tribes and has conducted consultation meetings to allow tribal input on the protection of cultural resources within the project area.

Consultation under both AB 52 and SB 18 has been conducted early in the planning process and prior to project approval, ensuring that tribal perspectives have been incorporated into the environmental review process, the development of mitigation measures, and long-term resource management. Documentation of all outreach and consultation efforts has been maintained by the City in accordance with CEQA and State guidance and will be included in the administrative record for the proposed project. Additional information about the consultation process and measures incorporated to reduce impacts to tribal cultural resources are available in Section 3.16, *Tribal Cultural Resources*, of this DEIR.

2.8 REFERENCES

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3. ENVIRONMENTAL ANALYSIS

This chapter examines the environmental setting of the proposed project, analyzes the effects of the proposed project and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter has a separate section for each environmental topic.

The proposed project is analyzed for potential significant impacts in accordance with Appendix F, "Energy Conservation," and Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines. Environmental topics and their corresponding sections and abbreviations are:

3.1 Aesthetics (AES)
3.2 Air Quality (AIR)
3.3 Biological Resources (BIO)
3.4 Cultural Resources (CUL)
3.5 Energy (ENE)
3.6 Geology and Soils (GEO)
3.7 Greenhouse Gas Emissions (GHG)
3.8 Hazards and Hazardous Materials (HAZ)
3.9 Hydrology and Water Quality (HYD)
3.10 Land Use and Planning (LUP)
3.11 Noise (NOI)
3.12 Population and Housing (POP)
3.13 Public Services (PUB)
3.14 Recreation (REC)
3.15 Transportation (TRA)
3.16 Tribal Cultural Resources (TCR)
3.17 Utilities and Service Systems (USS)

ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader with comparing information between environmental issues, each section is organized under the same major headings:

- **Regulatory Framework** offers an overview of applicable laws, regulations, plans, and policies relevant to each environmental topic.
- **Existing Conditions** offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared.
- **Standards for Analysis** refer to the quantitative or qualitative standards, performance levels, thresholds, or criteria used to evaluate whether an impact is significant. These standards are based primarily on the CEQA Guidelines unless otherwise noted. This section also provides an overview of key methods, assumptions, and considerations that inform the impact analysis.

- **Project Impact Analysis** provides a detailed discussion of the potential direct and indirect impacts of the proposed project. Mitigation measures are included as necessary.
- **Cumulative Impact Analysis** provides an overview of the geographic setting and cumulative projects considered in the cumulative impact assessment. Significant cumulative impacts are identified and mitigation measures are included as necessary.
- **References** are provided for information sources used in the development of the discussion.

LEVELS OF SIGNIFICANCE

The level of significance is identified for each impact in this DEIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Significant.** The project would exceed the established significance criteria. For each significant impact, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the EIR.
- **Significant and unavoidable.** The project would exceed the established significance criteria, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

SCOPING COMMENTS RECEIVED

Section 1.2.1, *Notice of Preparation*, summarizes the comments received during the NOP comment period. These comments have been considered in the development of the DEIR and inform the scope of environmental topics and analyses in this document.

EVALUATION METHODOLOGY

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency, based on substantial evidence in the record as a whole, including views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on the setting. Pursuant to CEQA Guidelines Section 15064(b), the analysis in this DEIR is based on

scientific and factual data that has been reviewed by the lead agency and represents the lead agency's independent judgment and conclusions.

Baseline

This EIR evaluates the impacts of the proposed project relative to existing conditions, as required by CEQA Guidelines Section 15126.2. Unless otherwise noted, the baseline represents the existing conditions on the ground (i.e., physical conditions) at the time that the Notice of Preparation was issued October 29, 2025.

The Farview Developmental Center (FDC) has been decommissioned as of December 2025. However, the Fairview State Hospital operated on the project site continuously from 1959 until its phased closure starting in 2016 and ending in 2025. As noted in Chapter 2, *Project Description*, in the year prior to its closure, the FDC employed 66 employees on the project site. Given the long-standing operation of the FDC on the project site, the baseline reflects some activity data based on the last year of its operations, such as noise, public services, transportation, and utility service systems (i.e., water demand, stormwater infrastructure, energy, wastewater and solid waste generation,). However, to provide a conservative analysis of environmental impacts, the following topical sections assume the buildings are vacant and no activities occur on-site: Energy, and employment generation.

Potential Effects of the Project on the Environment

The California Supreme Court concluded in *California Building Industry Association vs. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents." The *CBIA vs. BAAQMD* ruling provided for several exceptions to the general rule where an analysis of the project on the environment is warranted:

1. If the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried).
2. If the project qualifies for certain specified exemptions—certain housing projects and transportation priority projects pursuant to Public Resources Code (PRC) Sections 21159.21 (f),(h); 21159.22 (a),(b)(3); 21159.23 (a)(2)(A); 21159.24 (a)(1),(3); or 21155.1 (a)(4),(6).
3. If the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (pursuant to PRC Section 21096).
4. School projects require specific assessment of certain environmental hazards (pursuant to PRC Section 21151.8).

Therefore, the evaluation of the significance of project impacts under CEQA focuses on the potential impacts of the proposed project on the environment, including whether the proposed

project may exacerbate any existing environmental hazards. Existing environmental hazards in the project area include, but are not limited to, seismic hazards and hazardous materials.

Therefore, though the effects of these hazards on the proposed project are generally not subject to CEQA review following the *CBIA vs. BAAQMD* case, a discussion of the project's potential to exacerbate these hazardous conditions is provided in Section 3.6, *Geology and Soils*, and Section 3.8, *Hazards and Hazardous Materials*, of this DEIR.

CUMULATIVE IMPACTS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other reasonably foreseeable projects causing related impacts. CEQA Guidelines Section 15130 requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Cumulative effects could occur when future development under the project is combined with development in the surrounding area or, in some instances, in the entire region.

Pursuant to CEQA Guidelines Section 15130(a)(3), where a cumulative impact is significant when compared to baseline conditions, the analysis must address whether the project's contribution to the significant cumulative impact is "considerable." If the contribution of the project is considerable, then the EIR must identify potentially feasible measures that could avoid or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant, and no mitigation for the project's contribution is required.

CEQA Guidelines Section 15130(b)(1) states that the information used in the analysis of cumulative impacts should come from one or two sources:

A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or

B. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analyses in this EIR use a combination of Method A and B. Table 3-1, *Cumulative Projects*, provides a list of cumulative projects considered in the EIR.

Table 3-1 Cumulative Projects

Project Name	Project Location	Land Use	Size	Description
SREOC	2347-2389 Pearl Way	Multi-Use Center	▪ 15-acre site ▪ 39,000-square-foot office ▪ 21,000-square-foot warehouse	The project includes a 39,000-square-foot office and a 21,000-square-foot warehouse that would accommodate emergency personnel, public safety communications operations, a radio maintenance shop and emergency vehicle storage. The SREOC is currently under construction.
DDS SB 138 Harbor Village	Douglas Drive and Merrimac Way	Institutional	▪ 5-acre site ▪ Three dwelling units ▪ Three supportive structures	The project includes a DDS housing development consisting of three homes (with a maximum capacity of five beds per home) and three supportive structures for individuals with complex needs. The project is currently under construction.
NWWAB Zoning Updates & Housing Element Implementation	Citywide	Residential and Commercial (varies)	▪ 21,522 dwelling units ▪ 10,630,361, square feet of commercial	The City's Neighborhoods Where We All Belong Zoning Updates and Housing Element Implementation Project would result in a buildout of approximately 21,522 units on (Housing Element sites, except the FDC site, and non-Housing Element Measure K sites).*
Bear Street Residential Project	3150 Bear Street, Costa Mesa	High-Density Residential	▪ 6.12-acre site ▪ 142 townhomes ▪ Eight separate buildings	The project proposes new residential infill community consisting of a total of 142 for-sale townhomes within eight separate buildings. The project is currently under construction.
AAA Development Agreement	1498 South Coast Drive, Costa Mesa	Commercial	▪ 29.5-acre lot ▪ 250,000 square feet of office use	The project includes expansion of the Automotive Club of Southern California Headquarter campus by 250,000 square feet.
Home Ranch	1201 South Coast Drive	Commercial	▪ 31 Acre site	The project proposed development of 1,200,000

Table 3-1 Cumulative Projects

Project Name	Project Location	Land Use	Size	Description
	and 3315 Fairview Road, Costa Mesa		▪ 1,200,000 square feet of office and office related uses	square feet of office and office related uses.
One Metro West	1683 Sunflower Avenue, Costa Mesa	Mixed-Use (residential, retail, office, and recreational uses)	▪ 1,057 dwelling units ▪ 31,000 square feet of retail and commercial uses	The project proposes up to 1,057 dwelling units, 25,000 square feet (sq. ft.) of office, 6,000 sq. ft. of retail, and 1.5-acres of open space.

Source: Costa Mesa 2025.

* The Housing Element requires that the land use of the FDC Housing Element Site be revised to allow housing units that were identified to meet the RHNA (2,300 units). The proposed project is subject to requirements under State legislation and the City's Housing Element. Under SB 82 and SB 188, a portion of the FDC property is to be developed by DGS in consultation with DDS (480 du) while the remaining portion is developed by a Master Developer pursuant to the FDCSP (up to 3,520 du). As the only Housing Element Site subject to the proposed specific plan, the FDC site is excluded from the NWWAB Zoning Updates and Housing Element Implementation Project Area.

The cumulative discussions in Sections 3.1 through 3.17 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, county, watershed, air basin), which depends on the environmental topic being analyzed. For example, in assessing macroscale air quality impacts, all development in the air basin contributes to regional emissions of criteria pollutants, and basin wide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, however, only development in the local area of change would contribute to a cumulative visual effect because the area of change is only visible near that area.

3.1 AESTHETICS

This section of the DEIR describes the aesthetics-related impacts associated with the implementation of the proposed Fairview Developmental Center Specific Plan (proposed project). The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refer to the identification of visual resources, the quality of what can be seen, and an overall visual perception of the environment. This analysis aims to identify and objectively examine factors that contribute to the perception of aesthetic impacts.

Notice of Preparation Comments

The City received a letter from Costa Mesa First on December 5, 2025, for the Notice of Preparation (NOP). The comment letter requests that the EIR describe the consistency of the project's aesthetics with the City's motto: "City of the Arts" and study glare and light impacts. The relevant aesthetics issues raised in this comment letter are addressed in this section. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A, *Notice of Preparation and Scoping Meeting Comments*, for the complete comment letters.

3.1.1 Regulatory Framework

STATE

Senate Bill No. 743

Senate Bill (SB) 743, codified within Public Resources Code (PRC) Section 21099 et. seq., states that "Aesthetic (…) impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment" (PRC Section 21099(d)(1)). Pursuant to PRC Section 21099(d)(B), aesthetic impacts do not include impacts to historic or cultural resources. Pertinent definition applicable to PRC Section 21099(a) include:

- "**Infill site**" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- "**Transit priority area**" means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.
- "**Employment center project**" means a project on property zoned for commercial uses with a floor area ratio of no less than 0.75 and within a transit priority area.

- "**Major transit stop**" is defined by PRC Section 21064.3 to mean a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.

Qualifying projects that meet the criteria in PRC Section 21099 are exempt from findings of significance related to aesthetic impacts.

California Building Code

The California Building Code (CBC), Part 2 of Title 24 in the California Code of Regulations (CCR), is based on the International Building Code and combines three types of building standards from three different origins:

- Building standards that have been adopted by State agencies without change from building standards contained in the International Building Code.
- Building standards that have been adopted from the International Building Code to meet California conditions.
- Building standards authorized by the California legislature that constitute extensive additions not covered by the International Building Code that have been adopted to address particular California concerns.

The CBC includes standards for outdoor lighting that are intended to improve energy efficiency and to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

California Scenic Highway Program

The intent of the California Scenic Highway Program is "to protect and enhance California's natural scenic beauty and to protect the social and economic values provided by the State's scenic resources." Caltrans administers the program, which was established in 1963 and is governed by the California Streets and Highways Code (§ 260 et seq.). The goal of the program is to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of the adjacent land. Caltrans has compiled a list of state highways that are designated as scenic and county highways that are eligible for designation as scenic.

Scenic highway designation can provide several types of benefits to the region. Scenic areas are protected from encroachment of inappropriate land uses, free of billboards, and are generally required to maintain existing contours and preserve important vegetative features. Only low-density development is allowed on steep slopes and along ridgelines on scenic highways, and noise setbacks are required for residential development.

LOCAL

City of Costa Mesa Streetscape and Median Development Guidelines

The Streetscape and Median Development Standards outline Costa Mesa's urban design vision, which aims to enhance the City's historical agrarian character through tree and landscaping initiatives. The Standards serve as a blueprint for new streetscape projects and align with General Plan policies. The focus includes increasing tree preservation and appropriate species selection for parkways and medians. The document establishes criteria for public rights-of-way improvements and site furnishings while allowing for dynamic updates by the Parks and Recreation Commission as needed (Costa Mesa 2016).

City of Costa Mesa Residential Guidelines

The Residential Design Guidelines are intended to promote design excellence in new residential construction. The 2000 General Plan includes the following policies related to residential development:

- **CD-7A.1:** Ensure that new and remodeled structures are designed in architectural styles which reflect the City's diversity, yet are compatible in scale and character with existing buildings and natural surroundings within residential neighborhoods. Develop and adopt design guidelines for residential development.
- **CD-7A.2:** Preserve the character and scale of Costa Mesa's established residential neighborhoods; where residential development or redevelopment is proposed, require as a condition of approval that it is consistent with the prevailing character of existing development in the immediate vicinity, and that it does not have a substantial adverse impact on the adjacent areas.

In view of these policies, the City of Costa Mesa encourages architectural diversity that considers the existing neighborhood character and anticipated trends and development. These Residential Design Guidelines are intended to implement the goals, objectives, and policies of the 2000 General Plan as they relate to residential development. To achieve this, all residential construction shall be subject to architectural design guidelines, as appropriate, except for single-story construction in an R1 zone. It should be noted that these design guidelines are to be used in conjunction with the City of Costa Mesa Zoning Code, which provides numerous development standards that are applicable to new residential construction and additions (Costa Mesa 2013).

City of Costa Mesa General Plan

The General Plan Community Design Element includes goals and policies that relate to aesthetics.

- **Policy CD-1.4.** Promote a consistent landscape character along City streets to reinforce the unique qualities of each corridor and district, including the development of landscaped medians. Support implementation of the recommended street tree palette for each City street, as identified in the City of Costa Mesa Streetscape and Median Development Guidelines.
- **Policy CD-1.6.** Promote linkages between separate districts using bike trails, pedestrian paths, common medians or parkway landscaping, and other location-appropriate physical improvements. Through conditions of approval, public improvement projects, and other measures, support development of new connections and the enhancement of existing connections between districts.
- **Policy CD-2.1.** Consider urban design guidelines for each identified district in Costa Mesa that recognizes, maintains, and enhances the character and identity of each district; integrate existing specific plans' policies and design guidelines as applicable.
- **Policy CD-5.5.** Continue protection of Fairview Park as an open space and recreation area
- **Policy CD-6.1.** Encourage the inclusion of public art and attractive, functional architecture into new development that will have the effect of promoting Costa Mesa as the "City of the Arts".
- **Policy CD-7.1.** Ensure that new and remodeled structures are designed in architectural styles that reflect the City's eclectic quality, yet are compatible in scale and character with existing buildings and the natural surroundings within residential neighborhoods. Continue to update and maintain the Costa Mesa Residential Guidelines.
- **Policy CD-7.2.** Preserve the character and scale of Costa Mesa's established residential neighborhoods where possible; when new residential development is proposed, encourage that the new structures are consistent with the prevailing character of existing development in the immediate vicinity, and that new development does not have a substantial adverse impact on adjacent areas.
- **Policy CD-8.1.** Require that new and remodeled commercial development be designed to reflect architectural diversity, yet be compatible with the scale and character of the district.
- **Policy CD-8.9.** Ensure that new commercial development utilize site planning and design features that optimize compatibility with adjacent residential neighborhoods. The following guidance should be considered:
  - When adjacent residential and nonresidential uses can mutually benefit from connection, appropriate linkages (e.g., walkways, common landscape areas, and building orientation) are encouraged. Successful interaction between commercial and residential uses may be achieved through adequate setbacks, landscape buffers, screening,

decorative masonry walls, berms, building orientation, and limitations of commercial activities.

- Loading areas, access and circulation driveways, trash and storage areas, and rooftop equipment should be located as far as possible from adjacent residences.
- Building orientation and landscaping of commercial buildings should minimize direct lines of sight into adjacent residential private open space.

- **Policy CD-10.1.** Require that mixed-use development projects be designed to mitigate potential conflicts between uses. Consider noise, lighting, and security.
- **Policy CD-10.3.** Encourage adaptive reuse of existing industrial structures which results in rehabilitated buildings with distinctive and attractive architecture.
- Require that the design of lighting fixtures and their structural support be of a scale and architectural design compatible with on-site industrial buildings. Large areas should be illuminated to minimize the visual impact and amount of spillover light onto surrounding projects.

City of Costa Mesa Municipal Code

The Municipal Code is the official compilation of local laws, regulations, and ordinances governing Costa Mesa. It is the legal framework for managing and regulating various aspects of city life. The Municipal Code covers a broad spectrum of issues, including regulations related to property use, development standards, and land zoning classifications. The Municipal Code is periodically updated to incorporate new regulations and amendments, reflecting changes in State laws, evolving community needs, and municipal priorities. It is accessible to the public and serves as a resource for residents, businesses, and City officials to ensure compliance with local laws and policies.

City of Costa Mesa Zoning Code

Title 13, Planning, Zoning and Development, ("Zoning Code") of the City's Municipal Code, as amended by Ordinance No. 2025-07 (adopted on October 21, 2025), establishes the City's comprehensive framework for regulating land use, zoning, development, and subdivision activities. The Ordinance 2025-07 amends multiple chapters of Title 13, including general provisions, planning applications, the citywide land use matrix, development standards, off-street parking, landscaping, special land use regulations, nonconforming uses, and subdivisions. Together, these chapters provide coordinated standards to guide orderly development and implement the City's land use and planning policies.

The project site is currently zoned Institutional and Recreational Multi-use District (I&R-MLT) and Planned Development Residential–High Density (PDR-HD). This district is intended to allow the integration of a variety of land uses and intensities. This zoning district category includes uses that are low to moderate in density and intensity and urban in character. The multi-use center designation is applicable only to the Fairview Development Center property at 2501

Harbor Boulevard. See Table 3.1-1, *Development Standards for I&R-MLT and PDR-HD Zones*. The General Plan and Zoning Code amendments associated with the project would remove reference to these designations and instead refer to the FDCSP, where applicable, and amend the Southern Regional Emergency Operations Center (SREOC) designations, as described in Section 2.6.1. The City's General Plan and Zoning Code would be amended with the implementation of the proposed project.

Table 3.1-1 Development Standards for I&R-MLT and PDR-HD Zones

Development Standards	I&R-MLT	PDR-HD
Maximum density	In the I&R-MLT zone, future site development may permit residential areas, adhering to R1 standards for single-family homes. The zone has a cap of 250 units for single-family and 332 units for multifamily residential dwellings.	20
Minimum lot area	Six thousand square feet	3,000 square feet with an overall average of 3,500 square feet.
Minimum lot width	Sixty feet	--
Maximum floor area ratio	Refer to Chapter V, Article 8, floor area ratios	Refer to Chapter V, Article 8, floor area ratios
Maximum building height	Building heights for all uses must conform to I&R standards; single family residential must conform to the R1 building height standards	2 stories/27 feet
Front	Twenty feet	5 feet
Side or rear, abutting a secondary, primary or major street	Twenty feet	0 feet on one side; 10 feet combination of both sides. 5 feet
Side or rear, abutting all other streets	Ten feet	--
Interior lot line	Five feet. Additional setback may be required by the planning commission if deemed necessary to protect adjacent land uses.	--

3.1.2 Existing Conditions

This section describes the existing visual character of the project site and vicinity, scenic resources in the surrounding area, viewsheds, and light and glare conditions on the project site and adjacent properties.

VISUAL CHARACTER

Project Location

The project site covers approximately 95 acres at 2501 Harbor Boulevard in Costa Mesa. The portion of the project site within the former FDC facility is currently developed with buildings, paved areas, natural grass areas, trees, and ornamental landscaping (see Figure 2-4, *Aerial Map*).

The following description is based primarily on observations documented in the Phase I Environmental Site Assessment, which included an initial site survey conducted on October 8, 2019. The survey focused on the Central Power Plant facilities and included walkthroughs of the administration, education, recreation, and dormitory buildings.

Dormitory/Residential Facilities

The dormitory buildings are currently vacant. Architecturally and functionally, the dormitories are institutional in character and typically include restroom, shower, and dressing rooms; sleeping quarters; cold-food preparation and service areas; central nurse stations; and various ancillary rooms such as offices and quiet rooms. These buildings are generally utilitarian in design, with minimal architectural detailing and finishes. They are located throughout the project site.

Administration, Education, and Recreation Areas

The project site contains multiple buildings and open spaces historically used for administrative, educational, and recreational purposes. Key facilities include the Receiving and Treatment (R&T) building, the administration wing, the school, 20 modular classroom buildings, the activities center/library, the auditorium, and the swimming pool complex. The school is on the west side of the project site, the R&T building is on the east side, and the recreation building is in the southeast.

Receiving and Treatment Building

The four-story R&T building served as the facility's primary medical center, providing dental, medical, laboratory, and pharmaceutical services, and with classrooms. Additional classrooms,

offices, and a break room are in the basement. A biohazard medical waste receptacle is east of the northern wing of the building. The second and fourth floors contain residential areas.

Educational Facilities

Educational uses on-site include the main school building and 20 modular classroom structures on either side of Pearl Way near the southern boundary of the main campus.

The school building contains several vacant classrooms, an indoor gymnasium, and an outdoor recreation area to the west. There are classrooms on each side of Pearl Way that are prefabricated structures that have either a single large classroom or are divided into two classrooms.

Recreational Facilities

Recreational amenities include the library/activity center, auditorium, swimming pool facility, and central park area. The recreation buildings are currently vacant; the library/activity center contains one or two classroom spaces. The swimming pool is empty; associated features include a restroom building and a pool water treatment structure. Two small sheds on concrete pads are adjacent to and north of the pool water treatment building. Collectively, these facilities contribute to the institutional campus character of the site, with open spaces providing visual relief between building clusters.

Central Power Plant, Laundry, Kitchen, and Warehouse

The Central Power Plant, laundry facility, and main kitchen/shipping and receiving warehouse are centrally located and adjacent to one another, forming the operational core of the former FDC. The laundry building is attached to the north side of the Central Power Plant, with designated areas for washing, drying, and sorting/folding. These structures exhibit an industrial character, with large building footprints, service access areas, and minimal architectural detailing, reflective of their utilitarian function.

Surrounding Land Uses

The project site is surrounded to the east, west, and south by the Costa Mesa Country Club, a dominant visual feature characterized by open space, landscaped fairways, and trees. North of the project site are residential sites jointly owned and operated by Department of Developmental Services (DDS). These developments generally consist of one- to two-story buildings with landscaped setbacks and internal circulation drives, contributing to a suburban institutional character. The California Department of General Services (DGS) is in the process of developing the SREOC southwest of the project site on a 15-acre portion of the 109-acre FDC facility. Development in this area is anticipated to include low institutional buildings with modern architectural design and associated parking. The area around the project site consists of residential, commercial, and educational uses and the SREOC (see Figure 2-4, *Local Vicinity*).

Section 2.4.2, *Local Setting*, describes in depth the land uses around the project site. Overall, the visual character of the project site is defined by a mix of open space and low-density development, with building heights generally limited to one to three stories. The presence of landscaping, including clusters of trees and maintained green areas, softens the built environment and creates a cohesive suburban setting.

Visual Resources

The City of Costa Mesa's Community Design Element notes that "edges" are linear elements that form a visual or physical boundary, barrier, or transition between districts and define their boundaries. Elements such as freeways, flood channels, natural features and landforms may be considered edges (Costa Mesa 2015, p. CD-17). As shown in Figure CD-6, Edges, of the Community Design Element, the nearest edge is the Fairview Park trail 0.5 mile west of the project site.

Talbert Regional Park and its extensive natural areas provide an important visual reminder of the local landscape prior to urbanization and create a soft western edge of the City. Fairview Park and Talbert Regional Park soften the urban landscape.

The project site is three miles north of the coastline and does not have a clear look of the Pacific Ocean.

Landform

The project site is on Newport Mesa, an elevated coastal mesa between the Santa Ana River and Upper Newport Bay. This region's terrain results from ground uplift along the Newport-Inglewood fault zone. Ancient river activity created gaps in the mesas with coarse sediment deposits. The Alamitos, Sunset, Bolsa, and Talbert/Santa Ana Gaps are crucial geographical features. No unique landforms are visible on the project site.

SCENIC CORRIDORS

Scenic resources in Costa Mesa are primarily associated with natural open spaces, wetlands, recreational areas, and designated scenic highways. Key scenic areas include the open space and habitat areas along the Santa Ana River and the coastal bluffs as well as regional parks such as Talbert Regional Park, Fairview Park, and the nearby Randall Preserve. These areas preserve coastal views, provide habitat protection, and contribute to the City's visual character (Costa Mesa 2015, p. CON-1).

These natural features and designated corridors shape the City's urban form and community identity. Figure CD-2, Corridors, shows paths or sections of paths that have a special use or activity (Costa Mesa 2015, p. CD-5). The project site directly abuts the Harbor Boulevard corridor to the east and is about 0.5 miles from the Fairview Park corridor. These corridors are

important access routes that connect residents and visitors to nearby parks, open space areas, and other scenic resources throughout the City.

Scenic Vistas

According to the California Department of Transportation (Caltrans), no officially designated State Scenic Highways are in the vicinity of the project site. The nearest officially designated State Scenic Highway segment is California State Route (SR-) 91 in Orange County, approximately 13 miles northeast of the project site (Caltrans 2026). Pacific Coast Highway (SR-1), approximately 3 miles south of the project site, is an eligible but not officially designated State Scenic Highway (Caltrans 2026).

EXISTING VIEWSHEDS

The Community Design Element notes that the coastline creates a distinctive visual background, and views of the Pacific coast enhance the visual quality of districts within the viewshed (Costa Mesa 2015, p. 19). However, the project site is three miles north of the coastline and does not have a view of the Pacific Ocean.

Views outward from the project site are primarily characterized by the immediate surrounding uses. To the east, west, and south, the Costa Mesa Country Club provides broad views of open space, including manicured fairways, scattered mature trees, and low-profile maintenance structures. These views create a sense of visual openness and greenery. Looking north from the project site, views are more enclosed and defined by existing residential development. These areas consist of low-rise buildings, internal roadways, and landscaping, which limit long-range visibility and create a more suburban, campus-like visual environment.

Views toward the project site are similarly limited and localized. The project site is not prominently visible from major public vantage points, scenic corridors, or designated scenic vistas. Public views of the project site are generally restricted to nearby roadways and adjacent properties, where visibility is partially filtered by existing landscaping, trees, and the open space of the golf course. As a result, the project site does not function as a visually prominent feature within the broader landscape.

Overall, though the project site is within the general coastal influence area, existing views are defined by immediate surroundings rather than long-distance scenic vistas, and the project site does not contribute to or obstruct any designated scenic viewsheds.

LIGHT AND GLARE

The California Department of Developmental Services (DDS) issued a closure plan for the FDC in April 2016. By December 1, 2025, the facility was fully decommissioned, and all buildings on the approximately 109-acre developed portion of the campus were vacant.

Existing sources of light and glare on the site are limited and primarily associated with the FDC buildings, including reflective surfaces on building materials and windows.

3.1.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that, "except as provided in Public Resources Code Section 21099," the proposed project would result in a significant aesthetic impact if it would:

a) Have a substantial adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

d) Expose people on- or off-site to substantial light or glare, which would adversely affect day or nighttime views in the area.

THRESHOLD GUIDANCE

Under Public Resources Code (PRC) Section 21071, an unincorporated area is defined as an "urbanized area" if it meets two key criteria:

1. It is either completely surrounded by incorporated cities whose combined population with the unincorporated area is at least 100,000 and the unincorporated area's population density is equal to or greater than those cities, or it is located within an urban growth boundary with a residential density of at least 5,000 persons per square mile; and
2. The county board of supervisors has found that the area's general plan, zoning, and related policies encourage compact development that promotes efficient transportation, economic growth, affordable housing, energy efficiency, a balanced jobs-housing relationship, and protects the environment, open space, and agriculture, with the draft findings submitted to the Office of Planning and Research for review prior to finalization.

METHODOLOGY

The evaluation of aesthetics and aesthetic impacts is highly subjective, yet it must objectively identify the visual features of the existing environment and their importance. The characterization of aesthetics involves establishing existing visual character, including resources and scenic vistas unique to the City. Visual resources are determined by identifying existing landforms (e.g., topography and grading) and views (e.g., scenic resources such as natural features or urban characteristics). Changes to the existing aesthetic environment that would result from implementation of the proposed project are identified and qualitatively evaluated based on the proposed modifications to the existing setting and the viewer's sensitivity. This analysis focuses on the proposed project's potential to conflict with applicable zoning and other regulations governing scenic quality and create a new source of substantial light and glare in the City. Nighttime illumination and glare impacts are the effects of a project's exterior lighting on adjoining uses and areas. Light and glare impacts are determined through a comparison of the existing light sources with the proposed project's land uses and applicable development standards.

3.1.4 Project Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. In Costa Mesa, key visual assets include the Santa Ana River and regional parks such as Fairview Park and Talbert Regional Park, which preserve open space, protect habitat areas, and provide broad public views. The proposed project would involve demolition of the FDC buildings and redevelopment of the approximately 95-acre site with a mixed-use project. The proposed project would also include off-site improvements, including trails, secondary access road, and golf course reconfiguration.

The project site is located inland within an urbanized area and is not situated within or adjacent to a designated scenic vista or scenic highway. While regional scenic resources occur in the broader vicinity, including Fairview Park and Talbert Regional Park, the project site itself does not serve as a public vantage point for expansive or protected views. The proposed project's development standard would only allow two 12-story buildings at the project site. Due to the project site's inland location, existing urban context, and distance from recognized scenic viewpoints, the proposed buildings and off-site improvements would not obstruct views of the ocean, the Santa Ana River corridor, or nearby regional parks. Scenic vistas associated with these resources would remain available from established public viewpoints and trail systems. Nor is the project site itself part of a designated scenic vista.

Given the project site's distance from designated or locally valued scenic vistas and the absence of notable scenic view corridors to or from the project site, implementation of the proposed project would not result in a substantial adverse effect on a scenic vista. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings?

According to the California State Scenic Highways mapping system maintained by Caltrans, there are no designated scenic highways on or near the project site. The nearest eligible scenic highway is SR-1 about three miles south of the project site. The closest officially designated scenic highway is SR-91 in Orange County, approximately 13 miles northeast of the project site (Caltrans 2026). Due to the distance, topography, and intervening development and vegetation, the project site is not visible from either route. Additionally, there are no scenic resources on-site, such as rock outcroppings. There are historic resources on the project site, which are discussed in Section 3.4, *Cultural Resources*. Implementation of the proposed project would not alter scenic resources as viewed from a State scenic highway. Therefore, **no impact** would occur.

Significance without Mitigation: No impact.

c) In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

According to the latest U.S. Census Bureau data, Costa Mesa has a population of 110,523 persons (US Census 2023). It is surrounded by incorporated cities (see Figure 2-1, *Regional Location*) and would meet the population density threshold or planning policy requirements defined under PRC Section 21071. Additionally, the City of Costa Mesa does have its own general plan and zoning ordinances. The City and the project site are considered an urbanized area. The analysis below identifies the proposed project's potential to conflict with applicable zoning and other regulations governing scenic quality.

The zoning of the FDC portion of the project site is I&R-MLT and PDR-HD. Table 3.1-1, *Development Standards for I&R-MLT and PDR-HD Zone*, lists the development standards for these zones. The proposed project would have its own development and design standards, which would supersede Title 13, Chapter V, Development Standards, of the Costa Mesa Municipal Code. The proposed project would amend the zoning code to establish new zoning

and development standards and a zoning map to classify the project site as the Fairview Developmental Center Specific Plan. The proposed project's new zoning and development standards would guide the scale and character of future development and growth on the project site. Table 3.1-2, *Existing and Proposed Development Standards,* provides a comparison of existing and proposed development standards for the project site.

The two-acre Fair Drive portion of zone PDR-HD would be used as open space under the proposed project. The PDR-HD open space requirement states that 42 percent of the total project site needs to be open space with a 20-foot open space perimeter. Therefore, the proposed project would not conflict with the zoning for the two-acre site. PDR-HD is not included in Table 3.1-2.

Table 3.1-2 Existing and Proposed Development Standards

	Maximum Height	Minimum Density/Intensity
Existing Zoning		
I&R-MLT	Building heights for all uses must conform to I&R standards; single family residential must conform to the R1 building height standards which is 2 stories/27 feet for residential land uses.	In the I&R-MLT zone, future site development may permit residential areas, adhering to R1 standards for single-family homes. The zone has a cap of 250 units for single-family and 332 units for multifamily residential dwellings.
Proposed Zoning		
Residential	100 feet[1]	4,000 units[2]
DDS Housing	50 feet	32 DU/AC
Mixed-Use	135 feet	0.25 FAR
Commercial (standalone)	35 feet	0.40 FAR
Parking Structure	--[3]	

Notes:

DU/AC= dwelling unit per acre

FAR = floor area ratio

[1] Maximum height may be exceeded by 35 feet for two buildings.

[2] No density as the Draft EIR is analyzing the maximum units allowed which is 4,000 units while the distribution of affordable units could potentially change..

[3] Equal to the height of the building it serves.

Building heights shall comply with height limitations associated with the SREOC communication tower.

As shown in Table 3.1-2, the proposed project would result in higher buildings and more dense development than the surrounding area. The proposed project would result in 4,000 dwelling units and a number of 12-story buildings, which exceeds the unit count and height limitations within the existing zoning designation for the project site. The SREOC Tower and antenna clearance requirements also place restrictions around the allowable heights of buildings within the antenna's clearance zones. As shown in Figure 4-4 of the FDCSP, the communication tower requires a width of approximately 30 to 50 feet of clearance at certain specified heights to maintain direct line-of-sight radio communications with the La Habra Peak and Santiago Peak regional communication towers.

Although the I&R-MLT zone was specific to the FDC, the proposed project would exceed building height standards from other residential and commercial districts compared to the surrounding area. As noted in Table 13-32, Residential Development Standards, and Table 13-44, Commercial Property Development Standards, of the Municipal Code, in residential and commercial land uses, building heights cannot exceed two stories or 27 feet.[1] However, as mentioned under Impacts a) and b), the proposed project building height would not affect surrounding scenic vistas or views, nor would it conflict with any City regulations that govern scenic quality.

The proposed project includes off-site improvements, including trails, a secondary access point, and golf course reconfiguration. Project landscaping would be required to comply with Chapter 6, Open Space, Landscaping & Public Art. Chapter 6 establishes standards to enhance the City's aesthetic character by regulating the quality, quantity, and functional aspects of landscaping across all development types, including the enhancement of pedestrian and vehicular corridors. The proposed trail system would improve pedestrian connectivity and visual quality along circulation routes, and the secondary access point would introduce additional vehicular access that would be subject to applicable design and landscaping standards that would minimize potential visual impacts. In addition, the proposed project includes requirements that would preserve, protect, or limit tree removal on the project site. For example, existing trees removed during development shall be replaced on site at a ratio of two new trees for every one tree that is removed. These requirements help to enhance aesthetics and limit impacts to trees from the proposed project. Landscaping and irrigation associated with golf course facilities may be exempt from the provisions of Chapter 6 when deemed necessary and appropriate by the Planning Division, and consistent with applicable State requirements. Nonetheless, compliance with applicable landscaping standards would ensure that project-related improvements contribute positively to the visual character of the project site and surrounding area. Accordingly, the proposed project would not conflict with applicable zoning or regulations governing scenic quality.

Additionally, the proposed project would need to comply with the City of Costa Mesa Residential Guidelines, which encourage architectural diversity that considers the existing

[1] Except for Town Center District, which does not have a maximum height limit.

neighborhood character and anticipated trends and development. In addition, consistent with the City's established identity as the "City of the Arts," the proposed project would incorporate public art, facade articulation, and integrated design features intended to enhance the visual character of the project site and contribute scenic quality.

Because the proposed project includes amendments to the City's zoning regulations establishing new development standards for the project site, and because no applicable scenic quality regulations would be violated, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, this impact is **less than significant.**

Significance without Mitigation: Less than significant.

d) Would the project expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area?

The FDC site has been decommissioned since December 1, 2025, and existing on-site lighting is limited. Surrounding land uses in Costa Mesa include urban residential, commercial, and institutional development, all of which generate nighttime lighting typical of an urban environment.

The proposed project would introduce new sources of lighting associated with residential, mixed-use, commercial, and open space uses, including building-mounted fixtures, pedestrian-scale lighting, parking area lighting, and signage illumination. Off-site improvements, including trails, a secondary access point, and golf course reconfiguration, would also introduce incremental lighting such as pedestrian-scale trail lighting and roadway lighting. These light sources would increase nighttime illumination on the project site compared to its current vacant condition; however, they are typical of urban development, and the project site is in an urbanized area.

In addition, the proposed project includes design standards to minimize light spillover and glare. Section 5.3.10, Lighting, of the specific plan requires that lighting be designed to enhance safety and visibility while minimizing glare and light spillover.

- Pedestrian-scale lighting shall be provided along streets, paseos, open spaces, and building entrances.
- Lighting shall be directed downward and shielded to minimize impacts on adjacent properties.
- Lighting levels shall be appropriate to the scale and use of the space.

These standards would ensure that future lighting is controlled, shielded, and compatible with surrounding urban development. Other design guidelines include street lighting and building-

mounted lighting to be designed with an emphasis on pedestrian safety, minimizing light pollution, and creating a welcoming atmosphere at night. Additionally, modern lighting technologies (e.g., fully shielded LED fixtures) substantially reduce glare and skyglow compared to older lighting systems. While the proposed project would increase daytime and nighttime lighting on the project site, it would not introduce lighting that is atypical for urban mixed-use development, nor would it expose on- or off-site receptors to substantial glare or light spillover that would adversely affect nighttime views in the area. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.1.5 Cumulative Impact Analysis

The cumulative geographic context for aesthetic impacts includes the City of Costa Mesa and the surrounding developed areas of the project site where visual changes could overlap. Aesthetic impacts such as scenic vistas, visual character, and light and glare are generally localized and dependent on public vantage points. Therefore, the cumulative analysis focuses on whether the proposed project, in combination with other approved and reasonably foreseeable projects, would result in cumulatively considerable degradation of scenic resources, visual character, or nighttime views. Table 3-1, *Cumulative Projects*, in Chapter 3, *Environmental Analysis*, provides a list of cumulative projects considered such as SREOC, the DDS housing north of the project site near Harbor Village, and all of the housing inventory sites identified in the City's 6th Cycle Housing Element.

Would the project have a cumulative effect related to aesthetics?

Scenic Vistas

A scenic vista is a public viewpoint providing expansive views of valued landscapes. In Costa Mesa, key visual resources include the Santa Ana River corridor, Fairview Park, Talbert Regional Park, and distant coastal views. The proposed project site is in an urbanized inland portion of the City and is not situated within or adjacent to a designated scenic vista or publicly accessible viewpoint providing expansive coastal or regional park views. As discussed under Impact a), the proposed project would not substantially obstruct or degrade identified scenic vistas. Specifically, the SREOC that is intended to serve as a hub for emergency management planning efforts would also not substantially affect scenic vistas due to the location of the project site. Other cumulative development within the City would primarily be infill and redevelopment consistent with the General Plan and zoning regulations. Because the proposed project would not substantially impact scenic vistas on its own, it would not make a cumulatively considerable contribution to impacts on scenic vistas. Thus, the impact on scenic vistas is deemed **less than significant.**

Significance without Mitigation: Less than significant.

Scenic Highways

SR-1 is the closest eligible highway for scenic designation near the City, located approximately three miles south of the project site. The nearest officially designated State scenic highway is SR-91, approximately 13 miles northeast of the project site. The project site is not visible from either highway due to distance and intervening urban development. Specifically, the construction of the SREOC would also not substantially affect scenic highways due to its location. Future approved and reasonably foreseeable projects in the City would be subject to applicable General Plan policies and municipal code standards intended to ensure visual compatibility and protection of scenic resources. Other projects along or with the potential to impact SR-1 and SR-91 would need to comply with state and local regulations that would protect scenic highway views. Because the project site is not within the viewshed of a designated scenic highway, the proposed project would not contribute to a cumulatively considerable impact on scenic highways. Impacts would be less than cumulatively considerable. Therefore, this impact is **less than significant.**

Significance without Mitigation: Less than significant.

Visual Character or Scenic Quality

Costa Mesa is a fully urbanized community, and cumulative growth is anticipated through infill development and redevelopment of underutilized sites. While individual projects may alter the appearance of specific parcels, such changes are characteristic of evolving urban environments.

The proposed project, in combination with the SREOC and other nearby cumulative projects, would incrementally alter the visual character of the immediate area by introducing new buildings, circulation features, and open space improvements. Although the SREOC represents redevelopment of an existing use, its modernization together with the proposed project's off-site improvements, including trails, a secondary access point, and golf course reconfiguration would contribute to a gradual transition to a more contemporary, mixed-use, and interconnected urban environment. These combined improvements would enhance pedestrian connectivity, introduce updated architectural and landscape elements, and create a more cohesive and active visual environment.

The proposed project includes adoption of a Specific Plan with development and design standards intended to guide building massing, setbacks, open space, landscaping, and architectural character. These standards are intended to ensure compatibility with surrounding development and enhance the visual quality of the area. The SREOC and other cumulative projects would similarly be subject to adopted design and development regulations. As a result, although cumulative development would incrementally change the character of the area, it would not substantially degrade visual character on its own and would be subject to regulatory

controls, so it would not result in a cumulatively considerable degradation of scenic quality. Therefore, this impact is **less than significant.**

Significance without Mitigation: Less than significant.

Light and Glare

Existing development throughout Costa Mesa contributes to ambient nighttime lighting typical of an urban environment. The proposed project would introduce additional lighting associated with residential, mixed-use, commercial, and open space uses. The SREOC and other nearby cumulative projects would also introduce incremental lighting associated with building operations. However, as discussed under Impact d), lighting would be required to comply with City development standards and Specific Plan lighting requirements designed to minimize glare, light spillover, and skyglow. The combined effect of these projects would incrementally increase nighttime illumination and may shift the immediate area toward a more consistently illuminated urban environment. However, all projects would be required to comply with applicable lighting standards, including shielded fixtures, downward-directed lighting, and controls to minimize glare, light spillover, and skyglow. Because the proposed project would not result in a substantial light or glare impact individually, it would not contribute to a cumulatively considerable degradation of nighttime views or ambient lighting conditions. Therefore, this impact is **less than significant.**

Significance without Mitigation: Less than significant.

3.1.6 References

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3.2 AIR QUALITY

This section of the DEIR describes the air quality impacts associated with the implementation of the proposed Fairview Developmental Center Specific Plan (FDCSP or proposed project). This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). The analysis focuses on air pollution from regional emissions and localized pollutant concentrations. Criteria air pollutant emissions modeling for the proposed project is in Appendix B.1 of this DEIR. Transportation-sector impacts are based on trip generation and vehicle miles traveled (VMT), as provided by Fehr and Peers (Appendix K.2) and modeled using California Air Resources Board (CARB) EMFAC2025 (EMission FACtor model) v.2.1.0.

Notice of Preparation Comments

The City received three comment letters for the Notice of Preparation (NOP) regarding potential air quality impacts. A letter from the Costa Mesa First on December 5, 2025, claims that the proposed project would result in potential health risk impacts to nearby receptors. It recommends inclusion of project level mitigation measures to address potential air quality impacts and health risk impacts. Additionally, it requests preparation of a detailed traffic study, including analysis of truck routes near sensitive receptors. A letter from an individual on December 5, 2025, requests documentation of the proposed project's air quality emissions, including emissions associated with project-related traffic. A letter from the South Coast AQMD on December 5, 2025, requests electronic versions of DEIR and air-quality-related appendices and recommends the South Coast AQMD's CEQA Air Quality Handbook, use of CalEEMod for emissions modeling, use of South Coast AQMD's adopted significance thresholds for regional and localized impacts, and quantification of construction and operational emissions and overlapping emissions.

Terminology

The following are definitions for terms used throughout this section.

- **AAQS:** Ambient Air Quality Standards that define clean air, established to protect the health of sensitive communities.
- **Concentrations:** The amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu g/m^3$).
- **Criteria Air Pollutants:** Those air pollutants specifically identified for control under the Federal Clean Air Act (currently six: carbon monoxide, nitrogen oxides, lead, sulfur oxides, ozone, and particulates).
- **DPM:** Diesel particulate matter, exhaust from trucks, buses, trains, ships, and other equipment with diesel engines, containing a mixture of gases and solid particles.

- **Emissions:** The actual quantity of pollutant, measured in pounds per day or tons per year.
- **ppm:** Parts per million.
- **Sensitive receptor:** Land uses that are considered more sensitive to air pollution compared to others due to the types of population groups or activities involved. These land uses include residential, retirement facilities, hospitals, and schools.
- **TAC:** Toxic air contaminant.
- **µg/m^3:** Micrograms per cubic meter.
- **VMT:** Vehicle miles traveled.

CRITERIA AIR POLLUTANTS

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gasses (ROG)/volatile organic compounds (VOC), nitrogen oxides (NO_X), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb) are primary air pollutants. Of these, CO, SO_2, nitrogen dioxide (NO_2), PM_{10}, and $PM_{2.5}$ are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them. ROG and NO_X are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O_3) and NO_2 are the principal secondary pollutants.

Each of the primary and secondary criteria air pollutants and its known health effects are described below.

- **Carbon Monoxide (CO)** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines and motor vehicles operating at slow speeds are the primary source of CO in the South Coast Air Basin (SoCAB), the highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (South Coast AQMD 2005, 2022; USEPA 2026). The SoCAB is designated as being in attainment under the California AAQS and attainment (serious maintenance)[1] under the National AAQS (CARB 2026a).
- **Reactive Organic Gases (ROG)/Volatile Organic Compounds (VOC)** are composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is

[1] A maintenance area refers to a previously nonattainment area that has been redesignated to "maintenance" after it meets the standards and additional redesignation requirements in the Clean Air Act (Section 107(d)(3)(E)).

the major source of ROGs. Other sources include evaporative emissions from paints and solvents, asphalt paving, and household consumer products such as aerosols (South Coast AQMD 2005). There are no AAQS for ROGs. However, because they contribute to the formation of O_3, South Coast AQMD has established a significance threshold (South Coast AQMD 2023). The health effects for ozone are described later in this section.

- **Nitrogen Oxides (NO_X)** are a by-product of fuel combustion and contribute to the formation of ground-level O_3, PM_{10}, and $PM_{2.5}$. The two major forms of NO_X are nitric oxide (NO) and nitrogen dioxide (NO_2). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO_X produced by combustion is NO, but NO reacts quickly with oxygen to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 is an acute irritant and more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO_2 is only potentially irritating. NO_2 absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO_2 exposure concentrations near roadways are of particular concern for susceptible individuals, including asthmatics, children, and the elderly. Current scientific evidence links short-term NO_2 exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between elevated short-term NO_2 concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (South Coast AQMD 2005, 2022; USEPA 2026). The SoCAB is designated in attainment (maintenance) under the National AAQS and attainment under the California AAQS (CARB 2026a).
- **Sulfur Dioxide (SO_2)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and chemical processes at plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO_2. When sulfur dioxide forms sulfates (SO_4) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_X). Thus, SO_2 is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO_2 may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to SO_2, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are particularly adverse for asthmatics at elevated ventilation rates (e.g., while exercising or playing) at lower concentrations, and when combined with particulates, SO_2 may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency facilities and hospital admissions for respiratory illnesses, particularly in at-risk populations such as children, the elderly, and asthmatics (South Coast AQMD 2005, 2022; USEPA 2026). The SoCAB is designated as attainment under the California and National AAQS (CARB 2026a).
- **Suspended Particulate Matter (PM_{10} and $PM_{2.5}$)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now

recognized and regulated. Inhalable coarse particles, or PM_{10}, include particulate matter with an aerodynamic diameter of 10 microns or less (i.e., ≤0.01 millimeter). Inhalable fine particles, or $PM_{2.5}$, have an aerodynamic diameter of 2.5 microns or less (i.e., ≤0.002.5 millimeter). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM_{10} and $PM_{2.5}$ may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The US Environmental Protection Agency's (EPA) scientific review concluded that $PM_{2.5}$, which penetrates deeply into the lungs, is more likely than PM_{10} to contribute to health effects and at far lower concentrations. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing) (South Coast AQMD 2005, 2022). There has been emerging evidence that ultrafine particulates, which are even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.0001 millimeter) have human health implications because their toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs (South Coast AQMD 2022). However, the EPA and the CARB have not adopted AAQS to regulate these particulates. Diesel particulate matter is classified by CARB as a carcinogen (CARB 1999, 2023d). Particulate matter can also cause environmental effects such as visibility impairment,[2] environmental damage,[3] and aesthetic damage[4] (South Coast AQMD 2005, 2022; USEPA 2023a). The SoCAB is a nonattainment area for $PM_{2.5}$ under California and National AAQS and a nonattainment area for PM_{10} under the California AAQS (CARB 2026a).[5]

- **Ozone (O_3)** is a key ingredient of "smog" and is a gas that is formed when ROGs and NO_X, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. O_3 is a secondary criteria air pollutant. O_3 concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O_3 poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O_3 can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O_3 also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung

[2] $PM_{2.5}$ is the main cause of reduced visibility (haze) in parts of the United States.

[3] Particulate matter can be carried over long distances by wind and then settle on ground or water, making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.

[4] Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.

[5] CARB approved the South Coast AQMD's request to redesignate the SoCAB from serious nonattainment for PM_{10} to attainment for PM_{10} under the National AAQS on March 25, 2010, because the SoCAB did not violate federal 24-hour PM_{10} standards from 2004 to 2007. The USEPA approved the State of California's request to redesignate the South Coast PM_{10} nonattainment area to attainment of the PM_{10} National AAQS, effective on July 26, 2013.

tissue. O_3 also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O_3 harms sensitive vegetation during the growing season (South Coast AQMD 2005, 2022; USEPA 2024a). The SoCAB is designated extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour) (CARB 2026a).

- **Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (South Coast AQMD 2005, 2022; USEPA 2026). The major sources of lead emissions have historically been mobile and industrial sources. As a result of the USEPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. However, in 2008 the USEPA and CARB adopted more strict lead standards, and special monitoring sites immediately downwind of lead sources recorded very localized violations of the new state and federal standards.[6] Because emissions of lead are found only in projects that are permitted by South Coast AQMD, lead is not a pollutant of concern for the proposed project.

Table 3.2-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

[6] Source-oriented monitors record concentrations of lead at lead-related industrial facilities in the SoCAB, which include Exide Technologies in the City of Commerce; Quemetco, Inc., in the City of Industry; Trojan Battery Company in Santa Fe Springs; and Exide Technologies in Vernon. Monitoring conducted between 2004 through 2007 showed that the Trojan Battery Company and Exide Technologies exceed the federal standards (South Coast AQMD 2012).

Table 3.2-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	▪ Chest pain in heart patients ▪ Headaches, nausea ▪ Reduced mental alertness ▪ Death at very high levels	Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O_3)	▪ Cough, chest tightness ▪ Difficulty taking a deep breath ▪ Worsened asthma symptoms ▪ Lung inflammation	Atmospheric reaction of organic gases with nitrogen oxides in sunlight
Nitrogen Dioxide (NO_2)	▪ Increased response to allergens ▪ Aggravation of respiratory illness	Same as carbon monoxide sources
Particulate Matter (PM_{10} and $PM_{2.5}$)	▪ Hospitalizations for worsened heart diseases ▪ Emergency room visits for asthma ▪ Premature death	Cars and trucks (particularly diesels) Fireplaces and woodstoves Windblown dust from overlays, agriculture, and construction
Sulfur Dioxide (SO_2)	▪ Aggravation of respiratory disease (e.g., asthma and emphysema) ▪ Reduced lung function	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	▪ Behavioral and learning disabilities in children ▪ Nervous system impairment	Contaminated soil

Source: CARB 2026b.

TOXIC AIR CONTAMINANTS

CARB has identified other air pollutants as toxic air contaminants (TACs), which are pollutants that may cause serious, long-term effects. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2025a). By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The majority of the estimated

health risks from TACs can be attributed to relatively few compounds, the most relevant to the project being particulate matter from diesel-fueled engines.

Diesel Particulate Matter

In 1998, CARB identified particulate emissions from diesel-fueled engines (DPM) as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. Long-term (chronic) inhalation of DPM is likely a lung cancer risk. Short-term (i.e., acute) exposure can cause irritation and inflammatory symptoms and may exacerbate existing allergies and asthma symptoms (USEPA 2002).

CARB has promulgated specific rules to limit TAC emissions. The rules are in the California Code of Regulations (CCR).

- **13 CCR Chapter 10, Section 2485,** Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- **13 CCR Chapter 10, Section 2480,** Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- **13 CCR Section 2477 and Article 8,** Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

Ambient air quality standards have been adopted at the state and federal levels for criteria air pollutants. In addition, both the state and federal governments regulate the release of TACs. The proposed project is in the SoCAB and is subject to the rules and regulations imposed by the South Coast AQMD, the California AAQS adopted by CARB, and National AAQS adopted by the EPA. Federal, state, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized in this section.

3.2.1 Regulatory Framework

FEDERAL AND STATE

Ambient Air Quality Standards

The Clean Air Act (CAA) was passed in 1963 by the US Congress and has been amended several times. The 1970 CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS as well as the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States.

The CAA allows states to adopt more stringent standards or to include other pollution species. The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 3.2-2, *Ambient Air Quality Standards for Criteria Air Pollutants*. These pollutants are O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and Pb. In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard[1]	Federal Primary Standard[2]	Major Pollutant Sources
Ozone (O_3)[3]	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO_2)[4]	Annual Arithmetic Mean	*	0.010 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	*	
Respirable Coarse Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m^3	150 µg/m^3	
Respirable Fine Particulate Matter ($PM_{2.5}$)[5,6]	Annual Arithmetic Mean	12 µg/m^3	9 µg/m^3	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m^3	
Lead (Pb)	30-Day Average	1.5 µg/m^3	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	*	1.5 µg/m^3	
	Rolling 3-Month Average	*	0.15 µg/m^3	
Sulfates (SO_4)[7]	24 hours	25 µg/m^3	*	Industrial processes.
Visibility Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard[1]	Federal Primary Standard[2]	Major Pollutant Sources
Hydrogen Sulfide	1 hour	0.03 ppm	No Federal Standard	Hydrogen sulfide (H_2S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride	24 hours	0.01 ppm	No Federal Standard	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Sources: CARB 2024; USEPA 2025b.

Notes: ppm: parts per million; µg/m3: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

1 California standards for O3, CO (except 8-hour Lake Tahoe), SO2 (1 and 24 hour), NO2, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2 National standards (other than O3, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m3 is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

3 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

4 On December 27, 2024, the secondary annual SO2 standard was revised to an annual average, averaged over three consecutive years, with a level of 10 parts per billion (ppb).

5 On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m3 to 12.0 µg/m3. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15 µg/m3. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m3 were also retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

6 On February 7, 2024, the national annual PM2.5 standard was lowered from 12 µg/m3 to 9 µg/m3. The existing national 24-hour PM2.5 standards (primary and secondary), secondary annual PM2.5 standard, and PM10 standards (primary and secondary) were retained.

7 On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

California has also adopted a host of other regulations that reduce criteria pollutant emissions:

- **Assembly Bill (AB) 1493: Pavley Fuel Efficiency Standards.** Pavley I is a clean-car standard that reduces greenhouse gas emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016. In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025.
- **20 CCR: Appliance Energy Efficiency Standards.** The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances.
- **24 CCR, Part 6: Building and Energy Efficiency Standards.** Energy conservation standards for new residential and nonresidential buildings adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977.
- **24 CCR, Part 11: Green Building Standards Code.** Establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.[7]

Trump Administration Congressional Actions

In May 2025, Congress passed three Congressional Review Act resolutions to nullify a set of California's CAA preemption waivers targeting California's vehicle emissions program (Holland & Knight 2025).

- **H.J.Res. 87** disapproves the EPA's waiver for multiple California heavy-duty vehicle programs, including Advanced Clean Trucks (requiring increasing percentages of zero-emission truck sales), Zero Emission Airport Shuttles, and Zero-Emission Power Train Certification.
- **H.J.Res. 88** disapproves the EPA's waiver for Advanced Clean Cars II, which required all new passenger cars, trucks, and SUVs sold in California to be zero-emission by 2035.
- **H.J.Res. 89** disapproves the EPA's waiver for the "Omnibus" Low NO_X regulation, which establishes more stringent emissions standards for heavy-duty vehicles.

California Air Resources Board

CARB is a part of the California Environmental Protection Agency and responsible for the coordination and administration of both federal and state air pollution control programs in California. In this capacity, CARB conducts research, sets the California AAQS (see Table 3.2-1), compiles emission inventories, develops suggested control measures, and provides oversight of

[7] The green building standards became mandatory in the 2010 edition of the code.

local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), working closely with the federal government and the local air districts. The SIP is required for the state to take over implementation of the federal CAA from the USEPA.

Nuisance Regulations

Health and Safety Code Section 41700 states,

> ... a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.

This section also applies to objectionable odors.

Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act

Public exposure to toxic air contaminants (TACs) is a significant environmental health issue in California. In 1983, the California legislature enacted a program to identify the health effects of TACs and reduce exposure to them. The California Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health" (17 CCR Section 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 US Code Section 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit that TAC. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate "toxics best available control technology" to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

REGIONAL

Air Quality Management Planning

The South Coast AQMD is the agency responsible for improving air quality in the SoCAB and ensuring that the National and California AAQS are attained and maintained. South Coast AQMD is responsible for preparing the air quality management plan (AQMP) for the SoCAB in coordination with the Southern California Association of Governments (SCAG). The AQMP is a regional strategy plan to achieve air quality standards by examining emissions, looking at regional growth projections, and the impact of existing and proposed control measures to provide healthful air in the long-term. Since 1979, a number of AQMPs have been prepared.

The Clean Air Act requires CARB to develop a SIP that describes how an area will attain National AAQS. The AQMP provides the framework for air quality basins to achieve attainment of the State and National AAQS through the SIP. Areas are classified as attainment or nonattainment areas for a particular pollutant depending on whether they meet the AAQSs.

2022 AQMP

South Coast AQMD adopted the 2022 AQMP on December 2, 2022, as an update to the 2016 AQMP. On October 1, 2015, the EPA strengthened the National AAQS for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion (ppb) (2015 Ozone National AAQS). The SoCAB is currently classified as an “extreme” nonattainment for the 2015 Ozone National AAQS. Meeting the 2015 federal ozone standard requires reducing NO_X emissions, the key pollutant that creates ozone, by 67 percent more than is required by adopted rules and regulations by 2037. The only way to achieve the required NOx reductions is through extensive use of zero emission (ZE) technologies across all stationary and mobile sources. South Coast AQMD’s primary authority is over stationary sources, which account for approximately 20 percent of NO_X emissions. The overwhelming majority of NO_X emissions are from heavy-duty trucks, ships, and other State and federally regulated mobile sources that are mostly beyond the South Coast AQMD’s control. The region will not meet the standard without significant federal action. In addition to federal action, the 2022 AQMP requires substantial reliance on future deployment of advanced technologies to meet the standard. The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available ZE and low-NOx technologies and (2) developing new ZE and ultra-low NOx technologies for use in cases where the technology is not currently available. South Coast AQMD is prioritizing distribution of incentive funding in

environmental justice areas and seeking opportunities to focus benefits on the most disadvantaged communities (South Coast AQMD 2022).

South Coast AQMD $PM_{2.5}$ Redesignation Request and Maintenance Plan

In 1997, the EPA adopted the 24-hour fine $PM_{2.5}$ standard of 65 µg/m^3. In 2006, this standard was lowered to a more health-protective level of 35 µg/m^3. The SoCAB is designated nonattainment for both standards. In 2020, monitored data demonstrated that the SoCAB attained both 24-hour $PM_{2.5}$ standards. The South Coast AQMD developed the "2021 Redesignation Request and Maintenance Plan" for the 1997 and 2006 24 hour $PM_{2.5}$ standards, demonstrating that the SoCAB has met the requirements to be redesignated to attainment for the 24-hour $PM_{2.5}$ standards (South Coast AQMD 2021a).

Lead Implementation Plan

In 2008, the EPA designated the Los Angeles County (County) portion of the SoCAB as a nonattainment area under the federal lead (Pb) classification because of the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in the City of Vernon and the City of Industry that exceeded the new standard in the 2007 to 2009 period. The remainder of the SoCAB, outside the county nonattainment area, remains in attainment of the new 2008 lead standard. On May 24, 2012, CARB approved the SIP revision for the federal lead standard, which the EPA revised in 2008. Lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011. The SIP revision was submitted to the EPA for approval and was approved in March 2014 (CARB 2014).

Assembly Bill 617, Community Air Protection Program

AB 617 (C. Garcia, Chapter 136, Statutes of 2017) requires local air districts to monitor and implement air pollution control strategies that reduce localized air pollution in communities that bear the greatest burdens. In response to AB 617, CARB established the Community Air Protection Program.

Air districts are required to host workshops to help identify disadvantaged communities disproportionately affected by poor air quality. Once the criteria for identifying the highest priority locations have been identified and the communities have been selected, new community monitoring systems are installed to track and monitor community-specific air pollution goals. In 2018 CARB prepared an air monitoring plan (Community Air Protection Blueprint) that evaluates the availability and effectiveness of air monitoring technologies and existing community air monitoring networks. Under AB 617, the Blueprint is required to be updated every five years.

Under AB 617, CARB is also required to prepare a statewide strategy to reduce TACs and criteria pollutants in impacted communities; provide a statewide clearinghouse for best available retrofit control technology; adopt new rules requiring the latest best available retrofit control technology for all criteria pollutants for which an area has not achieved attainment of California AAQS; and provide uniform, statewide reporting of emissions inventories. Air districts are required to adopt a community emissions reduction program to achieve reductions for the communities impacted by air pollution that CARB identifies.

South Coast AQMD Rules and Regulations

All projects are subject to South Coast AQMD rules and regulations in effect at the time of activity, including:

- **Rule 401, Visible Emissions.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions. Specifically, the rule prohibits the discharge of any air contaminant into the atmosphere by a person from any single source of emission for a period or periods aggregating more than three minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the US Bureau of Mines.
- **Rule 402, Nuisance.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause, or have a natural tendency to cause injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403, Fugitive Dust.** This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth-moving and grading activities.
- **Rule 445, Wood Burning Devices.** In general, the rule prohibits new developments from installing wood-burning devices. This rule is intended to reduce the emission of particulate matter from such devices and applies to manufacturers and sellers of wood-burning devices, commercial sellers of firewood, and property owners and tenants that operate a wood-burning device.

- **Rule 1113, Architectural Coatings.** This rule serves to limit the VOC content of architectural coatings used on projects in the South Coast AQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the South Coast AQMD must comply with the current VOC standards in this rule.
- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities.** The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.
- **Rule 1166, Volatile Organic Compound Emissions from Decontaminated Soil.** Under this rule, an excavation plan is required, and excavation operations are required to be monitored for VOC concentrations.
- **Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants,** to minimize the amount of off-site fugitive dust emissions containing TACs by reducing particulate emissions in the ambient air as a result of earthmoving activities, including excavating, grading, handling, treating, stockpiling, transferring, and removing soil that contains applicable TACs. Components of the fugitive dust control plan are required to include the following measures: fencing that is a minimum of six feet tall and at least as tall as the height of the tallest stockpile, with a windscreen with a porosity of 50 ± 5 percent; monitoring; notification; signage; and recordkeeping.

LOCAL

City of Costa Mesa 2015-2035 General Plan

The 2015-2035 General Plan was adopted by the City Council in June 2016 (Costa Mesa 2016). Existing goals, policies, and programs aimed at reducing air quality impacts are primarily found in the Conservation Element and Circulation Element.

City of Costa Mesa Municipal Code

The City's Municipal Code is organized by title, chapter, article, and section. The following regulations relate to air quality impacts.

- **Title 5, Chapter I, Section 5-1, *Construction Codes Adopted*,** adopts the 2025 California Building Code and the 2025 California Energy Code.

- **Title 13, Chapter IX, Article 12, *Transportation Demand Management*,** complies with state law and Orange County Transportation Authority requirements by implementing a local trip reduction and Transportation Demand Management (TDM) program to help reduce traffic congestion from certain development projects. Applicable development shall provide improvements, such as preferential parking for carpool vehicles, bicycle parking and shower facilities, information on transportation alternatives, rideshare vehicle loading areas, vanpool vehicle accessibility, bus stop improvements, employee locker rooms, and safe pedestrian circulation systems.
- **Title 13, Chapter VII, *Landscaping Standards*,** helps establish requirements and standards for the design, installation, water conservation, and maintenance of landscape and irrigation.
- **Title 15, Chapter V, *Parkway Trees*,** helps preserve parkway trees during construction and provides guidelines for planting new trees within the city.
- **Title 5, Chapter X, *Small Residential Solar Energy System Permits*,** adopts an expedited, streamlined solar permitting process to achieve timely and cost-effective installations of small residential rooftop solar energy systems.
- **Title 5, Chapter XI, *Electric Vehicle Charging Station Permits*,** adopts an expedited streamlined permitting process to achieve timely and cost-effective installations of electric vehicle charging stations.
- **Title 10, Chapter XX, *Motor Vehicle Air Pollution Reduction*,** supports air quality improvement by enabling the collection of motor vehicle registration fees and establishing a dedicated fund to help the City implement programs that reduce air pollution from motor vehicles.

3.2.2 Existing Conditions

SOUTH COAST AIR BASIN

The project site is in the South Coast Air Basin (SoCAB), which includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds (South Coast AQMD 2005).

Meteorology

Temperature and Precipitation

The annual average temperature varies little throughout the SoCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The lowest average temperature is reported at 48°F in January and December and the highest average temperature is 78°F in August and September (Weather Spark 2026).

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from October through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. Rainfall averages 0.97 inches per year in the vicinity of the area (Weather Spark 2026).

Humidity

Although the SoCAB has a semiarid climate, the air near the earth's surface is typically moist because of a shallow marine layer. This "ocean effect" is dominant except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds. Periods of heavy fog are frequent, especially along the coast. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SoCAB (South Coast AQMD 2005).

Wind

Wind patterns across the southern coastal region are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east inhibit the eastward transport and diffusion of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions (South Coast AQMD 2005).

Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the "mixing height." The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the Project area (South Coast AQMD 2005).

SoCAB Nonattainment Areas

The AQMP provides the framework for air quality basins to achieve attainment of the state and federal ambient air quality standards through the SIP. Areas are classified as attainment or nonattainment areas for particular pollutants depending on whether they meet the ambient air quality standards. Severity classifications for ozone nonattainment range in magnitude from marginal, moderate, and serious to severe and extreme.

- ***Unclassified.*** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- ***Attainment.*** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- ***Nonattainment.*** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- ***Nonattainment/Transitional.*** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the SoCAB is shown in Table 3.2-3, *Attainment Status of Criteria Air Pollutants in the South Coast Air Basin*.

Table 3.2-3 Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
Ozone – 1-hour	Extreme Nonattainment	No Federal Standard
Ozone – 8-hour	Extreme Nonattainment	Extreme Nonattainment
PM_{10}	Serious Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment[1]
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Nonattainment (Los Angeles County only)[2]
All others	Attainment/Unclassified	Attainment/Unclassified

Source: CARB 2026a.

1. The SoCAB is pending a resignation request from nonattainment to attainment for the 24-hour federal $PM_{2.5}$ standards. The 2021 $PM_{2.5}$ Redesignation Request and Maintenance Plan demonstrates that the South Coast meets the requirements of the CAA to allow the EPA to redesignate the SoCAB to attainment for the 65 µg/m^3 and 35 µg/m^3 24-hour $PM_{2.5}$ standards. CARB submitted the 2021 $PM_{2.5}$ Redesignation Request to the EPA as a revision to the California SIP (CARB 2021).

2. In 2010, the Los Angeles portion of the SoCAB was designated nonattainment for lead under the new 2008 National AAQS as a result of large industrial emitters. Remaining areas for lead in the SoCAB are unclassified. However, lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011 (South Coast AQMD 2012). On May 24, 2012, CARB approved the SIP revision for the federal lead standard, which the USEPA revised in 2008. The SIP revision was submitted to the EPA for approval and was approved in March 2014 (CARB 2014).

Multiple Air Toxics Exposure Study V

The Multiple Air Toxics Exposure Study (MATES) is a monitoring and evaluation study on existing ambient concentrations of TACs and the potential health risks from air toxics in the SoCAB. In April 2021, South Coast AQMD released the latest update to the MATES study, MATES V. The first MATES analysis, MATES I, began in 1986 but was limited because of the technology available at the time. Conducted in 1998, MATES II was the first MATES iteration to include a comprehensive monitoring program, an air toxics emissions inventory, and a modeling component. MATES III was conducted in 2004 to 2006, with MATES IV following in 2012 to 2013.

MATES V uses measurements taken during 2018 and 2019, with a comprehensive modeling analysis and emissions inventory based on 2018 data. The previous MATES studies quantified the cancer risks based on the inhalation pathway only. MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been reexamined using current Office of Environmental Health Hazards Assessment and California Environmental Protection Agency (CalEPA) risk assessment methodologies and modern statistical methods to examine the trends over time.

The MATES V study showed that cancer risk in the SoCAB decreased to 454 in a million from 997 in a million in the MATES IV study. Overall, air toxics cancer risk in the SoCAB decreased by 54 percent since 2012 when MATES IV was conducted. MATES V showed the highest risk locations near the Los Angeles International Airport and the Ports of Long Beach and Los Angeles. DPM continues to be the major contributor to air toxics cancer risk (approximately 72 percent of the total cancer risk). Goods movement and transportation corridors have the highest cancer risk. Transportation sources account for 88 percent of carcinogenic air toxics emissions, and the remainder is from stationary sources, which include large industrial operations such as refineries and power plants as well as smaller businesses such as gas stations and chrome-plating facilities (South Coast AQMD 2021b).

Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the project area are best documented by measurements taken by the South Coast AQMD. The project area is in Source Receptor Area (SRA) 18–North Orange County Coastal.[8] The air quality monitoring station with the most recent data closest to the project area is the Anaheim-Pampas Lane Monitoring Station.[9] This station monitors one-hour and eight-hour O_3, NO_2, PM_{10}, and $PM_{2.5}$. Table 3.2-4, *Ambient Air Quality Monitoring Summary*, shows that the area rarely exceeded the state and federal one-hour and eight-hour O_3 standards, state PM_{10} standards, and federal $PM_{2.5}$ standards within the last three years.

[8] Per South Coast AQMD Rule 701, an SRA is defined as follows: "A source area is that area in which contaminants are discharged and a receptor area is that area in which the contaminants accumulate and are measured. Any of the areas can be a source area, a receptor area, or both a source and receptor area." There are 37 SRAs within the South Coast AQMD's jurisdiction.

[9] Locations of the SRAs and monitoring stations are shown at: http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf.

Table 3.2-4 Ambient Air Quality Monitoring Summary

Pollutant/Standard	Number of Days Threshold Were Exceeded and Maximum Levels During Such Violations[1,2]		
	2022	2023	2024
Ozone (O_3)			
State 1-Hour ≥ 0.09 ppm (days exceed threshold)	1	0	3
State & Federal 8-hour ≥ 0.070 ppm (days exceed threshold)	1	2	3
Max. 1-Hour Conc. (ppm)	0.102	0.089	0.104
Max. 8-Hour Conc. (ppm)	0.076	0.076	0.079
Nitrogen Dioxide (NO_2)			
State 1-Hour ≥ 0.18 ppm (days exceed threshold)	0	0	0
Max. 1-Hour Conc. (ppb)	0.0530	0.0509	0.0531
Coarse Particulates (PM_{10})			
State 24-Hour > 50 µg/m^3 (days exceed threshold)	1	1	0
Federal 24-Hour > 150 µg/m^3 (days exceed threshold)	0	0	0
Max. 24-Hour Conc. (µg/m^3)	67.0	97.8	118.9
Fine Particulates ($PM_{2.5}$)			
Federal 24-Hour > 35 µg/m^3 (days exceed threshold)	0	1	5
Max. 24-Hour Conc. (µg/m^3)	33.1	45.6	49.7

Source: CARB 2026c.

Notes: ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; * = Data not available

1. Data for O_3, NO_2, $PM_{2.5}$, and PM_{10} from Anaheim-Pampas Lane Monitoring Station.
2. Most recent data available as of January 2026.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution (i.e., TACs) than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and

intermittent, because the majority of the workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population.

Placement of New Sensitive Receptors

Because placement of sensitive land uses falls outside CARB's jurisdiction, CARB developed and approved the *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) to address the siting of sensitive land uses in the vicinity of freeways, distribution centers, rail yards, ports, refineries, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. This guidance document was developed to assess compatibility and associated health risks when placing sensitive receptors near existing pollution sources.

CARB's recommendations on the siting of new sensitive land uses are identified in Table 3.2-5, *CARB Recommendations for Siting New Sensitive Land Uses*. They were based on a compilation of recent studies that evaluated data on the adverse health effects ensuing from proximity to air pollution sources. The key observation in these studies is that proximity to air pollution sources substantially increases both exposure and the potential for adverse health effects. There are three carcinogenic TACs that constitute the majority of the known health risks from motor vehicle traffic: DPM from trucks and benzene and 1,3-butadiene from passenger vehicles.

Table 3.2-5 CARB Recommendations for Siting New Sensitive Land Uses

Source/Category	Advisory Recommendations
Freeways and High-Traffic Roads	Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.
Distribution Centers	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units [TRUs] per day, or where TRU unit operations exceed 300 hours per week). Take into account the configuration of existing distribution centers and avoid locating residences and other sensitive land uses near entry and exit points.
Rail Yards	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or CARB on the status of pending analyses of health risks.
Refineries	Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.

Table 3.2-5 CARB Recommendations for Siting New Sensitive Land Uses

Source/Category	Advisory Recommendations
Chrome Platers	Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloroethylene	Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with three or more machines, consult with the local air district. Do not site new sensitive land uses in the same building with perchloroethylene dry cleaning operations.
Gasoline Dispensing Facilities	Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas dispensing facilities.

Source: CARB 2005.

The project area is generally surrounded by residential, commercial, educational uses, and the Southern Regional Emergency Operations Center (SREOC) (refer to Figure 2-4, *Local Vicinity*). For additional information on surrounding land uses and nearby sensitive receptors, see Section 2.4.2, *Local Setting*, in Chapter 2, *Project Description*. Other nearby sensitive receptors include Estancia High School and Wilson Elementary School to the southwest, and Orange Coast College to the east of the project site.

Environmental Justice Communities

The South Coast AQMD region has the worst levels of ground-level ozone (smog) and among the highest levels of $PM_{2.5}$ in the nation. The air pollution levels in the region exceed both National and California AAQS for both these air pollutants. The health impacts associated with the high levels of air pollution cause respiratory and cardiovascular disease, exacerbate asthma, and can lead to premature death. EJ communities experience the brunt of the health effects from air pollution. In the 2022 AQMP, EJ communities are defined as census tracts in the top 25 percent in the California Office of Environmental Health Hazard Assessment's California Communities Environmental Health Screening Tool. Approximately 37 percent of the SoCAB residents live in EJ communities; however, the project area is not within an EJ community (South Coast AQMD 2022).

3.2.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that, "Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations." The proposed project would result in a significant air quality impact if it would:

a) Conflict with or obstruct implementation of the applicable air quality plan.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

SOUTH COAST AQMD THRESHOLDS

Regional Significance Thresholds

CEQA allows the significance criteria established by the applicable air quality management district or air pollution control district to be used to assess impacts of a project on air quality. South Coast AQMD has established thresholds of significance for air quality for construction activities and project operation in the SoCAB, as shown in Table 3.2-6, *South Coast AQMD Regional Significance Thresholds*.

The table lists thresholds that are applicable for all projects uniformly, regardless of size or scope. As previously discussed, there is growing evidence that although ultrafine particulate matter contributes a very small portion of the overall atmospheric mass concentration, it represents a greater proportion of the health risk from PM exposure. However, because the EPA and CARB have not adopted AAQS to regulate ultrafine particulate matter, South Coast AQMD has not developed thresholds for them.

Table 3.2-6 South Coast AQMD Regional Significance Thresholds

Air Pollutant	Construction Phase	Operational Phase
Reactive Organic Gases (ROGs)/ Volatile Organic Compounds (VOCs)	75 lbs./day	55 lbs./day
Carbon Monoxide (CO)	550 lbs./day	550 lbs./day
Nitrogen Oxides (NO_X)	100 lbs./day	55 lbs./day
Sulfur Oxides (SO_X)	150 lbs./day	150 lbs./day
Particulates (PM_{10})	150 lbs./day	150 lbs./day

Source: South Coast AQMD 2023.

Health Outcomes Associated with the South Coast AQMD Regional Significance Thresholds

Projects that exceed the South Coast AQMD's regional significance threshold contribute to the nonattainment designation of the SoCAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health effects. Exposure to fine particulate pollution and ozone causes myriad health impacts, particularly to the respiratory and cardiovascular systems:

- Increases cancer risk ($PM_{2.5}$, TACs)
- Aggravates respiratory disease (O_3, $PM_{2.5}$)
- Increases bronchitis (O_3, $PM_{2.5}$)
- Causes chest discomfort, throat irritation, and increased effort to take a deep breath (O_3)
- Reduces resistance to infections and increases fatigue (O_3)
- Reduces lung growth in children ($PM_{2.5}$)
- Contributes to heart disease and heart attacks ($PM_{2.5}$)
- Contributes to premature death (O_3, $PM_{2.5}$)
- Contributes to lower birth weight in newborns ($PM_{2.5}$) (South Coast AQMD 2015a)

Exposure to fine particulates and ozone aggravates asthma attacks and can amplify other lung ailments such as emphysema and chronic obstructive pulmonary disease. Exposure to current levels of $PM_{2.5}$ is responsible for an estimated 4,300 cardiopulmonary-related deaths per year in the SoCAB. In addition, University of Southern California scientists, in a landmark children's health study, found that lung growth improved as air pollution declined for children aged 11 to 15 in five communities in the SoCAB (South Coast AQMD 2015b).

South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals exposed to elevated concentrations of air pollutants in the SoCAB and has established thresholds that would be protective of these individuals. To achieve the health-

based standards established by the EPA, South Coast AQMD prepares an AQMP that details regional programs to attain the AAQS. Mass emissions thresholds shown in Table 3.2-6 are not correlated with concentrations of air pollutants, but mass emissions still contribute to the cumulative air quality impacts in the SoCAB. The thresholds are based on the trigger levels for the federal New Source Review Program, which was created to ensure projects are consistent with attainment of health-based National AAQS. Regional emissions from a single project do not trigger a regional health impact, and it is speculative to identify how many more individuals in the air basin would be affected by the health effects listed previously. Projects that do not exceed the South Coast AQMD regional significance thresholds in Table 3.2--6 would not violate regional air quality standards or contribute substantially to an existing or projected air quality violation.

If projects exceed the emission levels presented in Table 3.2-6, those emissions would cumulatively contribute to the nonattainment status of the air basin and would contribute to elevating health effects associated with these criteria air pollutants regionally. Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Reducing emissions would contribute to reducing possible health effects related to criteria air pollutants. However, for projects that exceed the emissions in Table 3.2-6, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment because mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited previously.

South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health to address the issue raised in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, Case No. S21978 (*Friant Ranch*). South Coast AQMD currently does not have methodologies that would provide the District with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions.[10] Ozone concentrations are dependent on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural

[10] In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Friant Ranch* in the review and analysis of proposed projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in *Friant Ranch* by the San Joaquin Valley Air Pollution Control District and South Coast AQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to likely health consequences for people from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the Friant Court's advice to explain in meaningful detail why this analysis is not yet feasible. Since this interim memorandum SMAQMD has provided methodology to address health impacts. However, a similar analysis is not available for projects within the South Coast AQMD region.

topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, and the absence of modeling tools that could provide statistically valid data and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects, it is not possible to link specific health risks to the magnitude of emissions exceeding the significance thresholds. However, if a project in the SoCAB exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

Localized Significance Thresholds

Criteria Air Pollutants

South Coast AQMD identifies localized significance thresholds (LST), shown in Table 3.2-7, *South Coast AQMD Localized Significance Thresholds*. Emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at a project site could expose sensitive receptors to substantial concentrations of criteria air pollutants. Off-site mobile-source emissions are not included in the LST analysis. A project would generate a significant impact if it generates emissions that, when added to the local background concentrations, violate the AAQS.

Table 3.2-7 South Coast AQMD Localized Significance Thresholds

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO_2 Standard (CAAQS)	0.18 ppm
Annual NO_2 Standard (CAAQS)	0.03 ppm
24-Hour PM_{10} Standard – Construction (South Coast AQMD)[1]	10.4 µg/m^3
24-Hour $PM_{2.5}$ Standard – Construction (South Coast AQMD)[1]	10.4 µg/m^3
24-Hour PM_{10} Standard – Operation (South Coast AQMD)[1]	2.5 µg/m^3
24-Hour $PM_{2.5}$ Standard – Operation (South Coast AQMD)[1]	2.5 µg/m^3
Annual Average PM_{10} Standard (South Coast AQMD)[1]	1.0 µg/m^3

Source: South Coast AQMD 2023.

Notes: ppm – parts per million; µg/m^3 – micrograms per cubic meter

1. Threshold is based on South Coast AQMD Rule 403. Since the SoCAB is in nonattainment for PM_{10} and $PM_{2.5}$, the threshold is established as an allowable change in concentration. Therefore, background concentration is irrelevant.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to the AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels, as well as implementation of control technology on industrial facilities, CO concentrations in the SoCAB and the state have steadily declined.

In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods.[11] As identified in South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide, peak carbon monoxide concentrations in the SoCAB in years before the 2007 redesignation were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection. According to the Bay Area Air District, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—to generate a significant CO impact (Bay Area Air District 2023).[12]

Toxic Air Contaminants

Whenever a project would require use of chemical compounds that have been identified in South Coast AQMD Rule 1401, placed on CARB's air toxics list pursuant to AB 1807, or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by the South Coast AQMD. Table 3.2-8, *South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds*, lists the TAC incremental risk thresholds for construction and

[11] The four intersections were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.

[12] The CO hotspot analysis refers to the modeling conducted by the Bay Area Air District for its CEQA Guidelines because it is based on newer data and considers the improvement in mobile-source CO emissions. Although meteorological conditions in the Bay Area differ from those in the Southern California region, the modeling conducted by Bay Area Air District demonstrates that the net increase in peak hour traffic volumes at an intersection in a single hour would need to be substantial. This finding is consistent with the CO hotspot analysis South Coast AQMD prepared as part of its 2003 AQMP to provide support in seeking CO attainment for the SoCAB. Based on the analysis prepared by South Coast AQMD, no CO hotspots were predicted for the SoCAB. As noted in the preceding footnote, the analysis included some of Los Angeles' busiest intersections, with daily traffic volumes of 100,000 or more peak hour vehicle trips operating at LOS E and F (South Coast AQMD 2003).

operation of a project. The type of land uses that typically generate substantial quantities of criteria air pollutants and TACs from operations include industrial (stationary sources) and warehousing (truck idling) land uses (CARB 2005). Educational and recreational land uses do not use substantial quantities of TACs; thus, these thresholds are typically applied to new industrial projects' operations only. Additionally, the purpose of this environmental evaluation is to identify the significant effects of the project on the environment, not the significant effects of the environment on the project (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478)).

Table 3.2-8 South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds

Maximum Incremental Cancer Risk (Project-Level)	≥ 10 in 1 million
Cancer Burden (in areas ≥ 1 in 1 million)	> 0.5 excess cancer cases
Hazard Index (project increment)	≥ 1.0

Source: South Coast AQMD 2023.

METHODOLOGY

The air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with future development that would be accommodated by the proposed project. The published South Coast AQMD's *CEQA Air Quality Handbook* and its updates on the South Coast AQMD website are intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. It provides standards, methodologies, and procedures for conducting air quality analyses in EIRs that were used in this analysis.

Construction

Implementation of the proposed project would generally occur over a period of up to 18 years, with full buildout of the proposed project in year 2045. However, because the proposed project is a broad-based policy plan, development for the individual land uses accommodated under the FDCSP is unknown.

For purposes of project-related construction emissions, construction emissions were estimated based on a worst-case scenario that involves sitewide improvements across the entire 95-acre plan area, maximum building development phase across 13 acres of the project area, and construction of the secondary access roadway. The sitewide improvements across the entire 95-acre plan area, including demolition, site preparation, mass grading, and utility trenching, are assumed to commence in 2027. Demolition of all existing buildings and asphalt is assumed during the first seven months. Mass grading and utility trenching are concurrent across the entire site over the following seven months. After sitewide improvements, it was assumed that construction of the maximum building development phase (Phase 3) and construction of the secondary access roadway would commence concurrently in 2028. For purposes of this

assessment, Phase 3 consisted of 947 housing units constructed over 50 months (4.2 years). The CalEEMod default construction durations for construction activities (fine grading, building construction, paving, and architectural coating) were normalized based on a 50-month schedule. Construction of the secondary access roadway is assumed over an approximately 40-workday schedule. For the purpose of this plan-level analysis, the mass grading phase is conservatively estimated to require up to 15,185 cubic yards of soil export for remediation purposes.

Construction assumptions such as construction equipment mix and construction worker trips were based on CalEEMod defaults, given lack of any development-specific information at this time (see Appendix B.1 for further details).

Table 3.2-9, *Construction Activities, Phasing, and Equipment*, shows the assumed construction activities, durations, and equipment mix for each of the activities.

Table 3.2-9 Construction Activities, Phasing, and Equipment

Activities[1]	Start Dates[2]	End Dates[2]	Equipment[3]
FDCSP – Sitewide Improvements			
Demolition	1/1/2027	7/1/2027	1 concrete/industrial saws; 3 excavators; 2 rubber-tired dozers; 1 crushing/proc. equipment
Site Preparation	7/2/2027	9/21/2027	3 scrapers; 9 rubber-tired dozers; 12 tractors/loaders/backhoes
Mass Grading	9/22/2027	4/23/2028	6 excavators; 3 graders; 3 rubber-tired dozers; 6 scrapers; 6 tractors/loaders/backhoes
Utility Trenching	9/22/2027	4/23/2028	2 excavators; 1 grader; 1 rubber-tired dozer; 2 scrapers; 2 tractors/loaders/backhoes
FDCSP – Worst-Case Development Phase (Phase 3) Scenario			
Fine Grading	4/24/2028	8/17/2028	2 excavators; 1 grader; 1 rubber-tired dozer; 2 scrapers; 2 tractors/loaders/backhoes
Building Construction	8/17/2028	12/31/2031	3 cranes; 9 forklifts; 3 generator sets; 9 tractors/loaders/backhoes; 3 welders
Paving	1/1/2032	3/15/2032	2 pavers; 2 paving equipment; 2 rollers
Architectural Coating	3/16/2032	5/27/2032	1 air compressor
FDCSP – Secondary Access Roadway			
Linear, Grubbing, and Land Clearing	4/24/2028	4/29/2028	1 crawler tractors; 1 excavator
Linear, Grading, and Excavation	4/30/2028	5/25/2028	3 excavators; 1 crawler tractor; 1 grader; 2 rollers; 2 scrapers; 1 rubber tired loaders; 2 tractors/loaders/backhoes

Table 3.2-9 Construction Activities, Phasing, and Equipment

Activities[1]	Start Dates[2]	End Dates[2]	Equipment[3]
Linear, Drainage, Utilities, and Subgrade	5/26/2028	6/11/2028	2 tractors/loaders/backhoes; 2 scrapers; 1 rough terrain forklift; 1 grader; 1 plate compactor; 1 pump; 1 air compressor; 1 generator set
Linear, Paving	6/12/2028	6/20/2028	3 rollers; 1 paving equipment; 1 paver; 2 tractors/loaders/backhoes

Source: CalEEMod Version 2022.1. Appendix B.1.

1. Based on CalEEMod defaults. Added Utility Trenching phase to account for excavation, pipe installation, backfilling, and associated equipment use.
2. Sitewide improvements are assumed before construction of worst-case development phase and secondary access roadway. Durations for worst-case development phase based on CalEEMod defaults and normalized over 50-month schedule.
3. Equipment mix largely based on CalEEMod defaults. Included crusher in Demolition phase for asphalt demolition reprocessing. Mass Grading and Site Preparation assumes three times the quantity of default CalEEMod equipment and includes scrapers for vegetation removal. Utility Trenching assumes CalEEMod-default equipment quantities and types for grading. To conservatively account for potential overlap of up to three building construction phases, the equipment for Building Construction phase was increased by a factor of three.

Operation

Following is a summary, by sector, of the assumptions used for the Specific Plan area's criteria air pollutant emissions at full buildout, as included in Appendix B.1.

- **Transportation.** The primary source of mobile-source emissions is from the combustion of fuel (i.e., gasoline and diesel). Transportation emissions forecasts were modeled using emissions data with adjusted factors from CARB's EMFAC2025 v.2.1.0 web database. Model runs were based on daily VMT data provided by Fehr and Peers (see Appendix J.2) and calendar year 2025 (existing) and 2045 (forecasted) emission rates. The VMT is based on the origin-destination methodology using the Orange County Transportation Analysis Model (OCTAM).
- **Area Sources.** Area sources generated from use of consumer products and cleaning supplies are based on CalEEMod default emission rates and on the assumed increase in dwelling units and commercial square footage.

- **Energy.** Building energy consumption estimates utilize the CalEEMod Version 2022.1 default energy (i.e., electricity and natural gas) rates for residential land uses, which are based on the CEC's 2019 Residential Appliance Saturation Survey (RASS). CalEEMod Version 2022.1 default energy rates for nonresidential land uses are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019 (CAPCOA 2022). Use of the CalEEMod default energy rates results in conservative estimates compared to the 2022 Building Energy Efficiency Standards because the energy intensity estimates compiled from the RASS utilize data from residences constructed from 1974 to 2015. It is anticipated new buildings under the latest standards would generally result in lower natural gas demand compared to the CalEEMod default energy rates.

3.2.4 Project Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

AQMP CONSISTENCY ANALYSIS

The South Coast AQMD is directly responsible for reducing emissions from area, stationary, and mobile sources in the SoCAB to achieve the National and California AAQS and has responded to this requirement by preparing an AQMP. The South Coast AQMD Governing Board adopted the 2022 AQMP, which is a regional and multiagency effort (South Coast AQMD, CARB, SCAG, and EPA).

A consistency determination with the AQMP plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to the clean air goals in the AQMP.

The two principal criteria for conformance with an AQMP are:

1. Whether the project would exceed the assumptions in the AQMP.

2. Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards.

SCAG is South Coast AQMD's partner in the preparation of the AQMP, providing the latest economic and demographic forecasts and developing transportation measures. Regional population, housing, and employment projects developed by SCAG are based, in part, on general plan land use designations. These projections form the foundation for the emissions inventory of the AQMP.

Criterion 1

CEQA Guidelines Section 15206(b) states that a proposed project is of statewide, regional, or area-wide significance if the project is a residential development of more than 500 dwelling units or a commercial office building of 250,000 square feet or more or that employs 1,000 or more employees. At full buildout, the proposed project would allow up to 4,000 housing units, 35,000 square feet of commercial space, and 74 employees in the FDCSP (refer to Table 2-3, *FDCSP Buildout*). Based on the increase in housing units, the proposed project is considered a project of statewide, regional, or area-wide significance.

As described under Section 3.12, *Population and Housing*, the anticipated population growth of 9,926 residents and 74 jobs associated with the proposed project would be within the projected growth for the county. Further, the proposed project would accommodate very-low and low-income housing needs within the City that would align with the City's 2021-2029 Housing Element by enhancing the City's existing housing supply for residents of all income levels. Therefore, the residential units generated by the proposed project would not result in unplanned growth in the project area. Overall, implementation of the proposed project would not substantially affect demographic projections beyond what is accounted for in the AQMP, and the proposed project would not be considered inconsistent with the AQMP under the first criterion.

Criterion 2

The SoCAB is designated nonattainment for O_3 and $PM_{2.5}$ under the California and National AAQS,[13] nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2026a). As evaluated under Air Quality Impact Discussion b), the proposed project would generate long-term emissions of criteria air pollutants that would exceed South Coast AQMD's regional operation-phase significance thresholds for ROG, NO_X, and CO. Consequently, long-term emissions generated by development allowed under the proposed project are considered to cumulatively contribute to the nonattainment designations of the SoCAB. Buildout of the proposed project could contribute to an increase in frequency or severity of air quality violations and delay attainment

[13] The SoCAB is pending a redesignation request from nonattainment to attainment for the 24-hour federal $PM_{2.5}$ standards. The 2021 $PM_{2.5}$ Redesignation Request and Maintenance Plan demonstrates that the South Coast meets the requirements of the CAA to allow the EPA to redesignate the SoCAB to attainment for the 65 $\mu g/m^3$ and 35 $\mu g/m^3$ 24-hour $PM_{2.5}$ standards. CARB will submit the 2021 $PM_{2.5}$ Redesignation Request to the EPA as a revision to the California SIP (CARB 2021).

of the AAQS or interim emission reductions in the AQMP, and emissions generated from buildout of the proposed project would result in a significant air quality impact. Therefore, implementation of the proposed project would not be consistent with the AQMP under the second criterion.

Summary

As discussed above, the projected growth resulting from implementation of the proposed project would be within the forecast growth for the City and County. However, the estimated long-term emissions generated under full buildout of the proposed project would exceed the South Coast AQMD's regional operational significance thresholds (see Table 3.2-11) and would cumulatively contribute to the nonattainment designations in the SoCAB. Therefore, the proposed project would be considered inconsistent with the AQMP, and impacts are considered **potentially significant**.

Significance without Mitigation: Potentially significant.

Impact AIR-1: The proposed project would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the South Coast AQMD's AQMP.

Mitigation Measure AIR-1: All new future development within the Fairview Developmental Center Specific Plan area shall implement the following provisions of the California Green Building Standards Code (CALGreen) as mandatory and not voluntary. The project applicant(s)/developer(s) shall provide documentation (e.g., building plans) of implementation of the applicable measures to the City of Costa Mesa Building Safety Division prior to the issuance of building permits.

Residential Structures with Three or Fewer Stories. For residential land uses with three or fewer stories, the project developer(s) shall:

- Design and build condominium/townhouses dwellings that have an attached private garage to have a dedicated electric circuit to support electric vehicle charging, as outlined in the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.1.
- Design and build residential buildings to, at a minimum, meet the Tier 2 electric vehicle parking standards of the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.2.1.
- Design and build residential buildings to meet the short- and long-term bicycle parking standards of the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.9.

- Design and build residential buildings to meet energy-efficiency requirements of the Residential Voluntary Measures of CALGreen, Division A4.2, Energy Efficiency, as outlined under Section A4.203.1.

Nonresidential Structures and Residential Structures with Four or More Stories. For nonresidential land uses and residential land uses that are four or more stories, the applicant/developer shall:

- Design and build structures to, at a minimum, meet the Tier 2 advanced energy efficiency requirements of the Nonresidential Voluntary Measures of CALGreen, Division A5.2, Energy Efficiency, as outlined under Section A5.203.1.2.2.

Mitigation Measure AIR-2: For residential and nonresidential land use development projects, the project applicant/developer shall comply with the following:

- All major appliances (e.g., dishwashers, refrigerators, clothes washers and dryers, and water heaters) provided/installed shall be EnergyStar certified or of equivalent energy efficiency where applicable.
- Installed water heaters shall meet a zero NO_X emissions standard.
- Installed central furnaces with a Rated Heat Input Capacity less than or equal to 2,000,000 British thermal units (Btu) per hour shall meet a zero NO_X emissions standard.
- Installed fireplaces shall be electric-powered only.

Prior to the issuance of the certificate of occupancy, the City of Costa Mesa Building Safety Division shall verify implementation of these requirements.

Mitigation Measure AIR-3: For nonresidential land use development projects, prior to issuance of the certificate of occupancy, the property owner shall provide documentation to the City of Costa Mesa Building Safety Division demonstrating enrollment in a 100 percent carbon-free electricity energy plan, such as Southern California Edison's Green Rate program, for proposed project building(s) when feasible. If a 100 percent carbon-free electricity plan is not available, the property owner shall enroll in an energy plan with the next highest carbon-free electricity until a 100 percent carbon-free electricity energy plan becomes available. Measures to achieve 100 percent carbon-free electricity use for the proposed project building(s) may include, but are not limited to, plans for 100 percent renewable electricity. If such carbon-free electricity energy plans are waitlisted, the property owner shall sign up for the waiting list until such time a plan is available.

Significance with Mitigation: Significant and unavoidable. Mitigation Measures for the project's long-term operational emissions would reduce project-related regional operational phase

criteria air pollutant emissions to the extent feasible. However, operation of the land uses accommodated by the proposed project would continue to exceed the South Coast AQMD regional significance thresholds and have the potential to conflict with the South Coast AQMD's AQMP. Therefore, Impact AIR-1 would be significant and unavoidable.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

REGIONAL CONSTRUCTION EMISSIONS

Construction activities under the proposed project would also temporarily increase PM_{10}, $PM_{2.5}$, VOC, NO_X, SO_X, and CO regional emissions in the SoCAB. The primary source of NO_X, CO, and SO_X emissions is the operation of construction equipment. The primary sources of particulate matter (PM_{10} and $PM_{2.5}$) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary sources of VOC emissions are the application of architectural coating and off-gas emissions associated with asphalt paving.

Construction activities associated with the proposed project would occur over an approximately 18-year building period, causing short-term emissions of criteria air pollutants. For the FDCSP, which is a broad-based policy plan, a master developer has not yet been selected, and therefore details on the construction phasing and equipment are not available. However, for purposes of this analysis, construction emissions are estimated based on worst-case construction development phase and construction of the secondary access roadway to represent the maximum potential daily emissions that could result from implementation of the proposed project. The estimate of maximum daily emissions provided in Table 3.2-10, *Maximum Daily Regional Construction Emissions,* is based on sitewide improvements, worst-case development phase scenario, and construction of the secondary access roadway, which are the most intensive construction activities that could occur during a single development phase. Therefore, the emissions identified in this table provide a conservative analysis of the proposed project's peak day emissions at any time during the 18-year buildout horizon.

Table 3.2 10 Maximum Daily Regional Construction Emissions

Construction Phase(s)[3]	Criteria Air Pollutants (pounds per day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
FDCSP – Sitewide Improvements						
Demolition	36	59	83	<1	19	6
Site Preparation	11	104	106	<1	34	17
Mass Grading and Utility Trenching 2027	12	108	116	<1	22	9
Mass Grading and Utility Trenching 2028	12	103	115	<1	22	9
FDCSP – Worst-Case Development Phase (Phase 3) Scenario and Secondary Access Roadway						
Fine Grading and Linear, Grubbing, and Land Clearing	3	28	32	<1	12	5
Fine Grading and Linear, Grubbing, and Excavation	6	47	59	<1	16	6
Fine Grading and Linear, Drainage, Utilities, and Subgrade	5	44	53	<1	15	6
Fine Grading and Linear, Paving	6	32	40	<1	12	5
Fine Grading	3	25	28	<1	12	5
Fine Grading and Building Construction	6	56	72	<1	16	6
Building Construction 2028	3	31	44	<1	4	1
Building Construction 2029	3	29	43	<1	4	1
Building Construction 2030	3	29	43	<1	4	1
Building Construction 2031	3	28	43	<1	4	1
Paving	1	6	10	<1	<1	<1
Architectural Coating	44	1	2	<1	<1	<1
Maximum Daily Emissions[4]	**44**	**108**	**116**	**<1**	**34**	**17**
South Coast AQMD Regional Thresholds	75	100	550	150	150	55
Significant?	No	Yes	No	No	No	No

Source: CalEEMod Version 2022.1. Highest winter or summer emissions are reported.

1. Construction equipment mix is based on CalEEMod default construction mix. See Appendix B.1 for a list of assumptions on emissions generated on a worst-case day.

2. Includes implementation of fugitive dust control measures consistent with South Coast AQMD Rule 403, which includes watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers.

3. For purposes of this analysis, it is assumed that sitewide improvements would occur across entire project area and then worst-case development phase and secondary access roadway would be simultaneous.

As shown in the table, construction activities associated with development of the proposed project could potentially exceed the South Coast AQMD regional significance threshold for NO_X. The primary source of NO_X emissions is vehicle and construction equipment exhaust. NO_X is a

precursor to the formation of both O_3 and particulate matter (PM_{10} and $PM_{2.5}$). Project-related emissions of NO_X would contribute to the O_3, PM_{10}, and $PM_{2.5}$ nonattainment designations of the SoCAB.

Overall, air quality emissions related to construction must be addressed on a project-by-project basis, and information regarding specific development projects such as construction activities needed, construction schedule, and construction equipment mix, would be needed in order to quantify the level of impact associated with construction activity. It is possible that future individual projects accommodated under the proposed project may not exceed the South Coast AQMD regional significance thresholds. However, the likely scale and extent of construction activities associated with all the future development projects accommodated under the proposed project would likely exceed the relevant South Coast AQMD thresholds for the criteria air pollutants other than NO_X. Therefore, construction-related regional air quality impacts of developments that would be accommodated by the proposed project would be **potentially significant**.

Significance without Mitigation: Potentially significant.

Impact AIR-2: Construction activities associated with future development that would be accommodated under the proposed project could generate short-term emissions in exceedance of the South Coast AQMD's threshold criteria.

> **Mitigation Measure AIR-4:** Prior to discretionary approval by the City of Costa Mesa for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project regional air quality, localized air quality, and health risk impacts from activities to the City of Costa Mesa Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance (South Coast AQMD Air Quality Significance Thresholds Table), the City of Costa Mesa Building Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include:
>
> - Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:
>   - Requiring use of nontoxic soil stabilizers to reduce wind erosion.
>   - Applying water every four hours to active soil disturbing activities.

  - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.

These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Department.

Significance with Mitigation: Significant and unavoidable. The proposed project would build out over a period of up to 18 years. Construction activities associated with buildout of the proposed project could generate short-term emissions that exceed the South Coast AQMD'S significance thresholds during this time and cumulatively contribute to the nonattainment designations of the SoCAB. Implementation of Mitigation Measure AIR-4 would reduce criteria air pollutant emissions from construction-related activities to the extent feasible. However, construction time frames and equipment for individual site-specific projects are not available and there is a potential for multiple developments to be constructed at any one time, resulting in significant construction-related emissions. Therefore, despite adherence to Mitigation Measure AIR-4, Impact AIR-2 would remain significant and unavoidable.

REGIONAL OPERATIONAL EMISSIONS

Buildout of the proposed project would result in direct and indirect criteria air pollutant emissions from transportation, energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment). Mobile-source criteria air pollutant emissions are based on the traffic analysis conducted by Fehr and Peers (see Appendix J.2 of this DEIR).

As shown in Table 3.2-11, *Maximum Daily Regional Operational Phase Emissions*, due to the projected proposed growth, operation of the land uses accommodated under the proposed project at buildout would generate an increase in criteria air pollutant emissions that exceed South Coast AQMD's regional significance thresholds for VOC, NO_X, and CO. Emissions of VOC and NO_X that exceed the South Coast AQMD regional threshold would cumulatively contribute

to the O_3 nonattainment designation of the SoCAB. Emissions of NO_X that exceed South Coast AQMD's regional significance thresholds would cumulatively contribute to the O_3 and particulate matter (PM_{10} and $PM_{2.5}$) nonattainment designations of the SoCAB.

Table 3.2-11 Maximum Daily Regional Operational Phase Emissions

Phase	Operation-Related Regional Emissions (pounds/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Proposed Project (Year 2045)						
Mobile[1]	3	7	437	<1	6	2
Area	120	59	254	<1	5	5
Energy	1	12	6	<1	1	1
Maximum Daily Emissions	**124**	**78**	**696**	**1**	**11**	**7**
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	No	No

Source: CalEEMod Version 2022.1. Based on highest winter or summer emissions.

1. Mobile emissions estimates reflect calendar year 2045 conditions and were derived using EMFAC2025 v.2.1.0.
2. Area and energy emissions estimates are based on CalEEMod default assumptions for specified land use size.

As described in Section 2.5, *Statement of Project Objectives*, one of the primary purposes of the proposed project is to transform the FDC site into a mixed-used, mixed-income community with multi-modal access to the surroundings areas, including pedestrian/bicycle infrastructure and public transit connections. These proposed project objectives emphasize increasing multi-modal accessibility and facilitating transit-oriented development. The proposed project would also include the Shelley Circle Trail, which would accommodate pedestrians, strollers, bicycles, and similar uses. Furthermore, the project site is near existing bus routes and pedestrian and bicycle infrastructure. Collectively, these project features would improve access to alternative modes of transportation, reduce reliance on single-occupancy vehicle trips, and decrease vehicle miles traveled (VMT), thereby helping to reduce long-term operational emissions of criteria air pollutants.

However, as shown in Table 3.2-11, operation of the land uses accommodated under the proposed project at buildout would generate an increase in criteria air pollutant emissions that exceed South Coast AQMD's regional significance thresholds for VOC, NO_X, and CO. Therefore, the proposed project would result in a **potentially significant** impact because it would significantly contribute to the nonattainment designations of the SoCAB.

Overlapping Construction and Operational Emissions

Construction of the proposed project could take up to 18 years, depending on market demand. Thus, its implementation could result in simultaneous operation and construction of land uses. Table 3.2-12, *Overlapping Construction and Operational Phase Emissions*, shows the potential maximum daily emissions from overlap of construction (worst-case) and operation-related (full buildout) activities.

Table 3.2-12 Overlapping Construction and Operational Phase Emissions

Source	Maximum Daily Emissions (pounds/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Proposed Project (Year 2045)						
Construction Phase	44	108	116	<1	34	17
Operational Phase	124	78	696	1	11	7
Maximum Daily Emissions	**168**	**186**	**812**	**1**	**45**	**24**
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	No	No

Source: CalEEMod Version 2022.1. Based on highest winter or summer emissions.

1. Maximum daily construction emissions are based on worst-case development scenario representing the most intensive development phase.

2. Maximum daily operational emissions based on worst-case full buildout conditions.The table shows that the potential maximum daily emissions from an overlap of the worst-case maximum daily emissions from construction activities and the worst-case maximum daily emissions under full buildout conditions would exceed South Coast AQMD's regional significance thresholds. Because the potential for overlap between construction and operational activities is currently unknown, a conservative analysis of potential overlapping emissions is provided for informational purposes.

Impact AIR-3: Long-term operation of the proposed project would generate emissions in exceedance of the South Coast AQMD's threshold criteria and cumulatively contribute to the South Coast Air Basin's nonattainment designations.

> **Mitigation Measure AIR-5:** Mitigation Measures AIR-1 through AIR-3 would apply and would contribute to reduce mobile-source, area-source, and energy sector criteria air pollutant emissions of the proposed project.

Significance with Mitigation: Significant and unavoidable. Buildout in accordance with the proposed project would generate long-term emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Mitigation Measures AIR-1 through AIR-3 would contribute to reducing criteria air pollutant criteria air pollutant emissions to the extent feasible. However, due to the magnitude of emissions generated by the land uses that would be accommodated by the proposed project, long-term criteria air pollutant emissions generated from the proposed

project could still exceed the South Coast AQMD's regional significance thresholds. Therefore, Impact AIR-3 would remain significant and unavoidable.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

This impact analysis describes changes in localized impacts from short-term construction activities. The proposed project could expose sensitive receptors to elevated pollutant concentrations during construction activities from construction equipment and vehicle exhaust and fugitive dust (criteria air pollutants only) if it would cause or contribute significantly to elevated levels. Unlike the emissions shown in Table 3.2-10, which are described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu g/m^3$) and can be correlated to potential health effects.

LOCALIZED CONSTRUCTION EMISSIONS

Construction-Phase Localized Significance Thresholds

The localized significance thresholds (LSTs) are the amount of project-related emissions at which localized concentrations (ppm or $\mu g/m^3$) would exceed the ambient air quality standards for criteria air pollutants for which the SoCAB is designated a nonattainment area. The proposed project would build out over a period of up to 18 years and would consist of multiple development phases, each with its own construction schedule and equipment mix.

Per the LST methodology, information regarding specific development projects and the locations of receptors would be needed in order to quantify the levels of localized construction-related impacts associated with future development phases. Because the proposed project is a broad-based policy plan, it is not possible to calculate individual, project-related, localized emissions at this time. Per South Coast AQMD methodology, LST analyses are conducted at the project level; therefore, quantification of LSTs is not applicable for this program-level environmental analysis.

However, because potential development and redevelopment could be close to existing sensitive receptors, the proposed project has the potential to expose sensitive receptors to substantial pollutant concentrations. Construction equipment exhaust (including DPM) combined with fugitive particulate matter emissions has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions and result in potentially significant impacts.

Construction Health Risk

South Coast AQMD currently does not require health risk assessments to be conducted for short-term emissions from construction equipment. Health risks associated with emissions from

construction equipment are primarily due to DPM. Office of Environmental Health Hazard Assessment (OEHHA) adopted guidance for the preparation of health risk assessments that was issued in March 2015 (OEHHA 2015). OEHHA has developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM.

Construction associated with future development phases facilitated under the proposed project would be implemented over a period of 18 years or longer. It is anticipated that construction of individual developments accommodated under the proposed project would likely be spread out incrementally over this period of time, which would limit the exposure of on- and off-site receptors to elevated concentrations of DPM. However, similar to the LST analysis, construction health risk can only be conducted at a project level; therefore, quantification of construction-related health risk is not applicable for this program-level environmental analysis. Because potential development and redevelopment could be close to existing sensitive receptors, the proposed project has the potential to expose sensitive receptors to substantial TAC concentrations. Consequently, construction equipment exhaust has the potential to expose sensitive receptors to substantial concentrations of TAC emissions and result in potentially significant impacts.

Summary

Construction-related emissions from individual development phases accommodated under the proposed project have the potential to expose sensitive receptors to substantial concentrations of air pollutants and TAC emissions. Therefore, this impact is **potentially significant**.

Significance without Mitigation: Potentially significant.

Impact AIR-4: Construction of the proposed project could expose sensitive receptors to substantial pollutant concentrations.

> **Mitigation Measure AIR-6:** Construction of projects subject to CEQA on sites of one acre or greater; within 1,000 feet of residential and other sensitive land use projects (e.g., hospitals, schools, nursing homes, day care centers), as measured from the property line of the project to the property line of the source/edge of the sensitive land use; that utilize off-road equipment of 50 horsepower or more; and with more than 12 months of active construction (i.e., exclusive of interior renovations), shall require preparation of a construction health risk assessment (HRA) prior to future discretionary project approval, as recommended in the current HRA Guidance Manual prepared by the California Office of Environmental Health Hazard Assessment (OEHHA). The construction HRA shall generally be prepared in accordance with policies and procedures of the OEHHA and the South Coast Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the construction HRA shows that the

incremental cancer risk exceeds 10 in a million or the appropriate noncancer hazard index exceeds 1.0, the construction HRA shall be required to identify all feasible measures capable of reducing potential cancer and noncancer risks to an acceptable level to the extent feasible (i.e., below 10 in a million or a hazard index of 1.0), including appropriate enforcement mechanisms.

The construction health risk assessment shall be submitted to the City for review and approval. Measures identified in the health risk assessment shall be included in grading plans prepared for the development projects. Compliance with these measures shall be verified during regular construction site inspections.

Significance with Mitigation: Significant and unavoidable. Construction activities associated with the proposed project could expose sensitive receptors to substantial concentrations of criteria air pollutants and TACs. Mitigation Measure AIR-6 would require that future development phases incorporate measures to reduce construction emissions that would minimize exposure of sensitive receptors to elevated concentrations of criteria air pollutant emissions and TACs. Additionally, individual development projects would be required to achieve the incremental risk thresholds established by South Coast AQMD.

However, because existing sensitive receptors may be close to project-related construction activities and due to the programmatic nature of the proposed project, construction emissions generated by future development phases have the potential to exceed SCAQMD's LSTs and contribute to higher levels of cancer risk in the SoCAB. Consequently, Impact AIR-4 would remain significant and unavoidable.

LOCALIZED OPERATIONAL EMISSIONS

Operation of new land uses that would be accommodated under the proposed project could generate new sources of criteria air pollutants and TACs in the project area from area/stationary sources and mobile sources. Unlike the mass operation emissions shown in Table 3.2-11, described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu g/m^3$) and can be correlated to potential health effects.

Operation Phase Localized Significance Thresholds

As stated, LSTs are the amount of project-related stationary and area sources of emissions at which localized concentrations (ppm or $\mu g/m^3$) would exceed the ambient air quality standards for criteria air pollutants for which the SoCAB is designated a nonattainment area. Typical sources of criteria air pollutant emissions within the project area from stationary and area sources include energy use (natural gas used for cooking and water heating) and landscaping fuel and aerosols. Types of land uses that typically generate substantial quantities of criteria air pollutants and TACs include industrial (stationary sources) and warehousing (truck idling) land uses.

The proposed project would allow up to 4,000 housing units, open space, and 35,000 square feet of neighborhood-serving retail and service uses and would not accommodate the types of land uses that could result in major air pollutant emissions sources. The proposed project would not introduce land uses that would generate substantial concentrations of criteria air pollutant emissions. Therefore, localized operation-related air quality impacts are considered less than significant.

Operational Phase Toxic Air Contaminants

Types of land uses that typically generate substantial quantities of criteria air pollutants and toxic air contaminants (TAC) include industrial (stationary sources) and warehousing (truck idling) land uses. The proposed project's residential and open space components would not create major sources of air pollutant emissions. As a result, operation of these type of land uses accommodated under the proposed project would not result in substantial concentrations of TACs. Development of the commercial land uses that are allowed under the proposed project may result in stationary sources of TACs emissions, such as restaurants with char broilers or buildings with emergency generators and boilers. However, these sources are not considered large emitters by South Coast AQMD. Furthermore, these types of stationary sources are subject to South Coast AQMD's new source review through their permitting requirements and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under South Coast AQMD Rule 1401. The permitting process ensures that stationary source emissions would be below the South Coast AQMD significance thresholds of 10 in a million cancer risk and 1 for acute risk at the maximally exposed individual. Therefore, overall, impacts related to TACs are considered less than significant.

Operational Phase CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO referred to as hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. Because CO is produced in the greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. The SoCAB has been designated as an attainment of both the National and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—to generate a significant CO impact (Bay Area Air District 2023).

Under full buildout conditions, the proposed project would result in overall maximum peak-hour turning movement of 7,231 trips during the PM peak hour, which is substantially below the incremental increase in peak-hour vehicle trips needed to generate a significant CO impact (see Figure 6, Peak Hour Volumes and Permitted Turning Movements Cumulative Year (2045) With

Project, in Appendix J.2). Implementation of the proposed project would not have the potential to substantially increase CO hotspots at intersections in the project area. Impacts would be less than significant.

Summary

At full buildout, operation of the proposed project would not expose sensitive receptors to substantial concentrations of air pollutants or TACs, nor would it result in significant CO impacts. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

ODORS

Nuisance odors from land uses in the SoCAB are regulated under South Coast AQMD Rule 402, *Nuisance*, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Industrial and South Coast AQMD Permitted Land Uses

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. These types of uses and industrial land use types would not be accommodated under the proposed project.

Residential and Other Non-residential Land Uses

Residential and other non-residential (excluding industrial) land uses accommodated under the proposed project could result in generation of odors such as exhaust from landscaping equipment and cooking. However, unlike industrial land uses, these are not considered potential generators of odor that could affect a substantial number of people. Additionally, for

uses that could generate food odors such as restaurants, coffee roasters, and breweries, these types of uses would be subject to South Coast AQMD Rule 402 which would minimize and provide a control for odors. Therefore, impacts from potential odors generated from residential and other non-residential land uses associated with the proposed project are considered less than significant.

Construction

During construction activities, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern and are not expected to affect a substantial number of people. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of odor-producing materials. Therefore, impacts associated with construction-generated odors are considered less than significant.

Summary

Odors generated from future land uses and construction associated with the proposed project would not generate odors that would adversely affect sensitive receptors. Consequently, odor impacts are **less than significant**.

Significance without Mitigation: Less than significant.

3.2.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to air quality?

In accordance with the South Coast AQMD methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. Cumulative projects in the local area include new development and general growth in the project area. The greatest source of emissions in the SoCAB is mobile sources. Due to the extent of the area potentially impacted by cumulative project emissions (i.e., the SoCAB), the South Coast AQMD considers a project cumulatively significant when project-related emissions exceed the South Coast AQMD regional emissions thresholds shown in Table 3.2-6.

Specifically, the South Coast AQMD published a report on how to address cumulative impacts from air pollution: “White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution.” In this report the South Coast AQMD clearly states:

> …the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.
>
> Projects that exceed the project-specific significance thresholds are considered by the South Coast AQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. (South Coast AQMD 2003b, p. D-3)

As identified in Impact AIR-2 (regional construction impacts), Impact AIR-3 (regional operation impacts), and Impact AIR-4 (localized construction impacts), implementation of the proposed project would cumulatively contribute to the nonattainment designations of the SoCAB and could expose sensitive receptors to substantial pollutant concentrations. Accordingly, the proposed project's cumulative air quality impacts are considered significant.

Construction

The SoCAB is designated nonattainment for O_3, $PM_{2.5}$, and PM_{10} under California and/or National AAQS. Construction of cumulative projects will further degrade the regional and local air quality. Air quality will be temporarily impacted during construction activities. Implementation of Mitigation Measure AIR-4 and AIR-6 for future development phases would help reduce cumulative impacts. However, project-related construction emissions could still potentially exceed the South Coast AQMD significance thresholds on future development phases and on a cumulative basis. Thus, the proposed project's contribution to cumulative air quality impacts would be cumulatively considerable and therefore significant.

Operation

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional threshold values is not considered by South Coast AQMD to be a substantial source of air pollution and does not add significantly to a cumulative impact. Operation of the proposed project would result in emissions in excess of the South Coast AQMD regional emissions thresholds for VOC, NO_X, CO and potentially for the other criteria air

pollutants. Therefore, the air pollutant emissions associated with the proposed project would be cumulatively considerable and therefore significant.

Summary

Overall, the proposed project's construction and operational phase emissions would cumulatively contribute to air quality impacts in the SoCAB, and impacts are **significant.**

Impact AIR-5: The proposed project's contribution to cumulative air quality impacts would be cumulatively considerable.

Mitigation Measures: Implement Mitigation Measures AIR-1 through AIR-6.

Significance with Mitigation: Significant and unavoidable. While Mitigation Measures AIR-1 through AIR-6 would require projects under the FDCSP to incorporate measures that reduce emissions of criteria air pollutants and toxic air contaminants, construction and operational activities may exceed regional and localized emissions thresholds resulting in significant and unavoidable and cumulatively considerable air quality impacts.

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3.3 BIOLOGICAL RESOURCES

This section of the DEIR evaluates the potential of the Fairview Developmental Center Specific Plan (proposed project) to impact biological resources in the City of Costa Mesa. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary. Unless otherwise cited, information in this section comes from the following source(s):

- *Biological Technical Report*, ECORP, January 2026 (DEIR Appendix C.1)
- *Tree Survey and Arborist Report - 2026*, CAL Pacific Sciences, February 2026 (DEIR Appendix C.2)
- *Tree Survey and Arborist Report - 2024,* CAL Pacific Sciences, January 2024 *(*DEIR Appendix C.3)

Notice of Preparation Comments

The City received four comment letters on the Notice of Preparation (NOP) regarding biological resources. Three of the four letters note that the park contains habitat for sensitive species; request the preservation of migratory birds, corridors and linkages, improvements to the tree canopy, bird and wildlife surveys; and that analysis is done consistent with applicable biological resource laws. The fourth letter, submitted by the California Department of Fish and Wildlife, states that no special status species or sensitive habitats are present on the site or the surrounding golf course. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the comment letters.

Terminology

CESA	California Endangered Species Act
CDFW	California Department of Fish and Wildlife
CNDDB	California Natural Diversity Database
COV	Covered
CRPR	California Rare Plant Rank
FDC	Fairview Developmental Center
FESA	Federal Endangered Species Act
HCP	Habitat Conservation Plan

RWQCB	Regional Water Quality Control Board
MBTA	Migratory Bird Treaty Act
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
SAA	Streambed Alteration Agreement
SSC	Special Concern
USACE	United States Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
WOTUS	Waters of the United States

3.3.1 Regulatory Framework

FEDERAL

Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973, as amended, protects and conserves any species of plant or animal that is endangered or threatened with extinction, as well as the habitats where these species are found. "Take" of endangered species is prohibited under Section 9 of the FESA. "Take" means to "harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." Section 7 of the FESA requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) on proposed federal actions that may affect any endangered, threatened, or proposed (for listing) species or critical habitat that may support the species. Section 4(a) of the FESA requires that critical habitat be designated by the USFWS "to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened." This provides guidance for planners/managers and biologists by indicating locations of suitable habitat and where preservation of a particular species has high priority. Section 10 of the FESA provides the regulatory mechanism for incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans for the impacted species must be developed in support of incidental take permits to minimize impacts to the species and formulate viable mitigation measures.

Section 9: Prohibited Acts

Once a species is listed, section 9 of the ESA makes it unlawful for any person, including private and public entities, to "take" species listed as endangered or without a permit issued pursuant to section 10 or an incidental take statement issued pursuant to section 7. Section 9 defines

"take" as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." The term "harm" is defined as "an act which actually kills or injures wildlife. Such an act may include substantial habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering."

ESA Section 9's take prohibitions apply to listed wildlife and fish species, but not to plants. Endangered plants are not protected from take, although it is unlawful to remove, possess, or maliciously damage or destroy them on federal lands. Removing or damaging listed plants on state and private lands in knowing violation of state law, or in the course of violating a state criminal trespass law, also is illegal under the ESA.

Section 10: Incidental Take Permits and Habitat Conservation Plans

An incidental take permit pursuant to section 10(a)(1)(B) is required when non-federal, otherwise lawful activities, including lawful project development, will result in take of threatened or endangered wildlife. Under this provision, the USFWS and/or National Marine Fisheries Service may, where appropriate, authorize the taking of federally listed wildlife or fish if such taking occurs incidentally during otherwise legal activities. Section 10(a)(2)(B) requires an application for an incidental take permit to include a Habitat Conservation Plan (HCP). The HCP process ensures adequate avoidance, minimization, and mitigation measures to address the effects of the authorized incidental take. Section 10 provides a clear regulatory mechanism to permit the incidental take of federally listed fish and wildlife species by private interests and non-federal governmental agencies.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) protects individuals as well as any part, nest, or eggs of any bird listed as migratory. In practice, federal permits issued for activities that potentially impact migratory birds typically have conditions that require pre-disturbance surveys for nesting birds. In the event nesting is observed, a buffer area with a specified radius must be established, within which no disturbance or intrusion is allowed until the young have fledged and left the nest, or it has been determined that the nest has failed. If not otherwise specified in the permit, the size of the buffer area varies with species and local circumstances (e.g., presence of busy roads, intervening topography, etc.) and is based on the professional judgment of a monitoring biologist. A list of migratory bird species protected under the MBTA is published by USFWS.

Clean Water Act, Section 404

The United States Army Corps of Engineers (USACE) regulates discharge of dredged or fill material into "waters of the United States." Any filling or dredging within waters of the United States requires a permit, which entails assessment of potential adverse impacts to USACE wetlands and jurisdictional waters and any mitigation measures that the USACE requires.

Section 7 consultation with USFWS may be required for impacts to a federally listed species. When a Section 404 permit is required, a Section 401 Water Quality Certification is also required from the Regional Water Quality Control Board (RWQCB).

Clean Water Act, Sections 401 and 402

Section 401(a)(1) of the CWA specifies that any applicant for a federal license or permit to conduct any activity that may result in any discharge into navigable waters shall provide the federal permitting agency with a certification, issued by the state in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA. In California, the applicable RWQCB must certify that the project will comply with water quality standards. Permits requiring Section 401 certification include Corps Section 404 permits and National Pollutant Discharge Elimination System (NPDES) permits issued by the Environmental Protection Agency (EPA) under Section 402 of the CWA. NPDES permits are issued by the applicable RWQCB. The City of Costa Mesa is in the jurisdiction of the Santa Ana RWQCB (Region 8).

US Army Corps of Engineers

The USACE Regulatory Branch regulates activities that discharge dredged or fill materials into waters of the United States (WOTUS) under Section 404 of the federal CWA and Section 10 of the Rivers and Harbors Act. Its authority applies to all WOTUS where the material (1) replaces any portion of a WOTUS with dry land or (2) changes the bottom elevation of any portion of any WOTUS. Activities that result in fill or dredge of WOTUS require a permit from the USACE. To be considered WOTUS, a feature must be a traditional navigable water, an interstate water, a territorial sea, or an impoundment of these waters, or have a connection to a traditional navigable water (whether as a tributary or as an adjacent wetland).

STATE

California Endangered Species Act

The California ESA (California Fish and Game Code Sections 2050–2116) generally parallels the main provisions of the federal ESA, but unlike its federal counterpart, California ESA applies the take prohibitions to species proposed for listing (called candidates by the state). Section 2080 of the California Fish and Game Code prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. Take is defined in Section 86 of the California Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” Section 2081 allows CDFW to authorize incidental take permits if species-specific minimization and avoidance measures are incorporated to fully mitigate the impacts of a project.

California Fish and Game Code, Section 1600

Section 1600 of the California Fish and Game Code requires a project proponent to notify the California Department of Fish and Wildlife (CDFW) of any proposed alteration of streambeds, rivers, and lakes. The intent is to protect habitats that are important to fish and wildlife. CDFW may review and place conditions on the project, as part of a Streambed Alteration Agreement (SAA) that address potentially significant adverse impacts within CDFW's jurisdictional limits.

California Fish and Game Code, Sections 3503 et seq.

Section 3503.5 of the California Fish and Game Code states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Activities that result in the abandonment of an active bird of prey nest may also be considered in violation of this code. In addition, California Fish and Game Code Section 3511 prohibits the taking of any bird listed as fully protected, and California Fish and Game Code Section 3515 states that it is unlawful to take any non-game migratory bird protected under the MBTA.

California Migratory Bird Protection Act

The California Migratory Bird Protect Act (MBPA) was enacted in September 2019 to reinforce the MBTA at the state level. The Act states:

> It is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act (16 U.S.C. Sec. 703 et seq.) before January 1, 2017, any additional migratory nongame bird that may be designated in that federal act after that date, or any part of a migratory nongame bird described in this section, except as provided by rules and regulations adopted by the United States Secretary of the Interior under that federal act before January 1, 2017, or subsequent rules or regulations adopted pursuant to that federal act, unless those rules or regulations are inconsistent with this code.

This section was made inactive on January 20, 2025, and the following language was operative starting January 20, 2025.

> It is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act (16 U.S.C. Sec. 703 et seq.), or any part of a migratory nongame bird described in this section, except as provided by rules and regulations adopted by the United States Secretary of the Interior under that federal act.

Nesting Bird Protection, California Fish and Game Code

Nesting birds, including raptors, are protected under California Fish and Game Code Section 3503, which reads, "it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, under California Fish and Game Code Section 3503.5, "it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Passerines and non-passerine land birds are further protected under California Fish and Game Code Section 3513. Under the California Endangered Species Act (see following section), special status species and candidate species, which includes but is not limited to specific nesting bird species, are also protected and a take is prohibited.

Fish and Game Code Section 3800 indicates that all birds occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds are nongame birds. And it is unlawful to take any nongame bird except as provided in the California Fish and Game Code.

Pursuant to these code sections, CDFW recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings or lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by CDFW.

California Endangered Species Act

The California Endangered Species Act (CESA) generally parallels the main provisions of the FESA and is administered by the CDFW. Its intent is to prohibit take and protect state-listed endangered and threatened species of fish, wildlife, and plants. Unlike its federal counterpart, CESA also applies the take prohibitions to species petitioned for listing (state candidates). Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Under certain conditions, CESA has provisions for take through a 2081 permit or memorandum of understanding. In addition, some sensitive mammals and birds are protected by the state as "fully protected species." California "species of special concern" are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. This list is primarily a working document for the CDFW's California Natural Diversity Database (CNDDB), which maintains a record of known and recorded occurrences of sensitive species. Informally listed taxa are not protected per se, but warrant consideration in the preparation of biological resources assessments.

California Native Plant Protection Act

The California Native Plant Protection Act of 1977 (California Fish and Game Code Sections 1900 et seq.) prohibits importation of rare and endangered plants into California, "take" of rare and endangered plants, and sale of rare and endangered plants. CESA defers to this act, which ensures that state-listed plant species are protected when state agencies are involved in projects subject to CEQA. Although plants listed as rare under the California Native Plant Protection Act are not protected under CESA, CEQA requires evaluation of impacts to endangered, rare, or threatened species — including plants — when analyzing environmental impacts of projects.

LOCAL

City of Costa Mesa General Plan

The Conservation Element of the General Plan includes the following policies related to biological resources within the city:

- **Policy CON-1.A.1.** Natural habitat is essential to ensuring biodiversity and protecting sensitive biological resources. Protect these areas and consult with the California Department of Fish and Wildlife, Orange County Water District, Orange County Parks, and other regional agencies to identify areas for special protection, and establish appropriate protection measures for these areas.
- **Policy CON-1.A.2.** Contribute to regional biodiversity and the preservation of rare, unique, and sensitive biological resources by maintaining functional wildlife corridors and habitat linkages.
- **Policy CON-1.A.3.** Coordinate with the United States Fish and Wildlife service, the California Department of Fish and Wildlife, and other regulatory agencies to mitigate project impacts affecting open and natural spaces.
- **Policy CON-1.A.5.** Ensure that all future development is reviewed with regard to protecting natural topography and bluffs to preserve and enhance Costa Mesa's natural beauty.

The Conservation Element of the General Plan includes the following policies related to biological resources within the city:

- **Policy OSR-3.3.** Identify current open space areas for protection, management, and potential enhancement to maintain and, if possible, increase its value as wildlife habitat.

City of Costa Mesa Municipal Code

Municipal Code Chapter 5 (Title 15), Parkway Trees, includes policies specifically regulating parkway and public trees—trees in public rights-of-way, medians, and tree easements—and requires a permit for any tree installation, removal, or alteration in the public right-of-way. Municipal Code Chapter 7 (Title 13), Landscaping Standards, establishes landscaping standards for the maintenance, pruning, irrigation, and removal of trees in the City. Municipal Code Section 13-108 protects and preserves trees planted in the City and details acceptable tree pruning, irrigation, and removal methods. For example, topping or "heading back" cannot be used in lieu of pruning or thinning, and trees cannot be destroyed or removed without prior City approval. Site plans that identify existing and replacement trees must be submitted to the Planning Division for review, along with written request and justification for the removal. Additionally, the Planning Division may require a report prepared by a California-licensed arborist. Where possible, and under the direction of the Planning Division, replacement trees must be of a size consistent with that to be removed.

3.3.2 Existing Conditions

The 95-acre project site includes the Fairview Developmental Center (FDC) Specific Plan on the FDC property, and a portion of the Costa Mesa Country Club Golf Course and the off-site improvement area (Shelley Circle Trail), including a 30-foot buffer area as off-site improvement areas. The biologists observed mature trees as part of landscaping along streets and between buildings throughout the FDC; within residential areas; and scattered between fairways on the Costa Mesa Country Club golf course and along its border.

SOILS

Soils within the project site primarily consist of Myford sandy loam, Myford sandy loam, and Omni clay, drained. The desktop review of the Natural Resources Conservation Service (NRCS) Hydric Soils List did not identify the soils on the project site as hydric soils. A hydric soil is a soil that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part (Appendix C.1).

VEGETATION COMMUNITIES AND LAND COVER

ECORP biologists characterized and mapped one vegetation community during the biological reconnaissance survey as annual brome grassland (*Bromus* spp.) (Herbaceous Semi-natural Alliance) (Appendix C.1). The biologists characterized and mapped one vegetation community and four land cover types on the biological reconnaissance survey area—disturbed, developed, open water, and landscaped—shown on Figure 3.3-1, *Vegetation Communities and Land Cover Types*. The division of the one vegetation community and four land cover types on the biological reconnaissance survey area are shown in Table 3.3.1, *Vegetation Communities and Land Cover*

Acreages, and a detailed description of the vegetation community and four land cover types on the project site are discussed below.

Table 3.3-1 Vegetation Communities and Land Cover Acreages

Vegetation Community/Land Coder Type	Project Site Acreages
Annual Brome Grassland	2.13
Disturbed	13.35
Developed	81.31
Open Water	0.58
Landscaped	43.24
Total	**140.61**

Source: Appendix C.1

- **Annual Brome Grassland**: The areas mapped as annual brome grassland on the project site are mostly devoid of native vegetation due to maintained (mowed) conditions. The annual grassland is present in the southern portion of the project site and is primarily dominated by brome grasses (*Bromus spp*.). Other plants observed in this community include Russian thistle (Salsola tragus), Bermuda grass (Cynodon dactylon), blue foxtail (Hordeum murinum ssp. glaucum), and short podded mustard (Hirschfeldia incana). Non-native, landscaped trees are scattered within the annual brome grasslands, including a stand of eucalyptus in the southeastern portion of the project site. CDFW considers annual brome grassland a semi-natural stand, and a global and state rarity rank is not applicable.

- **Disturbed**: Disturbed is a land cover type, not a vegetation community. Disturbed land includes areas where the native vegetation community has been heavily influenced by human actions—such as grading, trash dumping, equipment staging, and off-highway vehicle use—that lack infrastructure associated with development. During the survey, the southeastern corner of the FDC was part of an active construction site, where much of the ground had been cleared of vegetation and graded; as such, ECORP classified this area as disturbed. ECORP also classified the southern portion of Shelley Circle Trail as disturbed because it is a compact, dirt road used as a corridor for maintenance carts and other vehicles associated with Costa Mesa Country Club golf course operations.

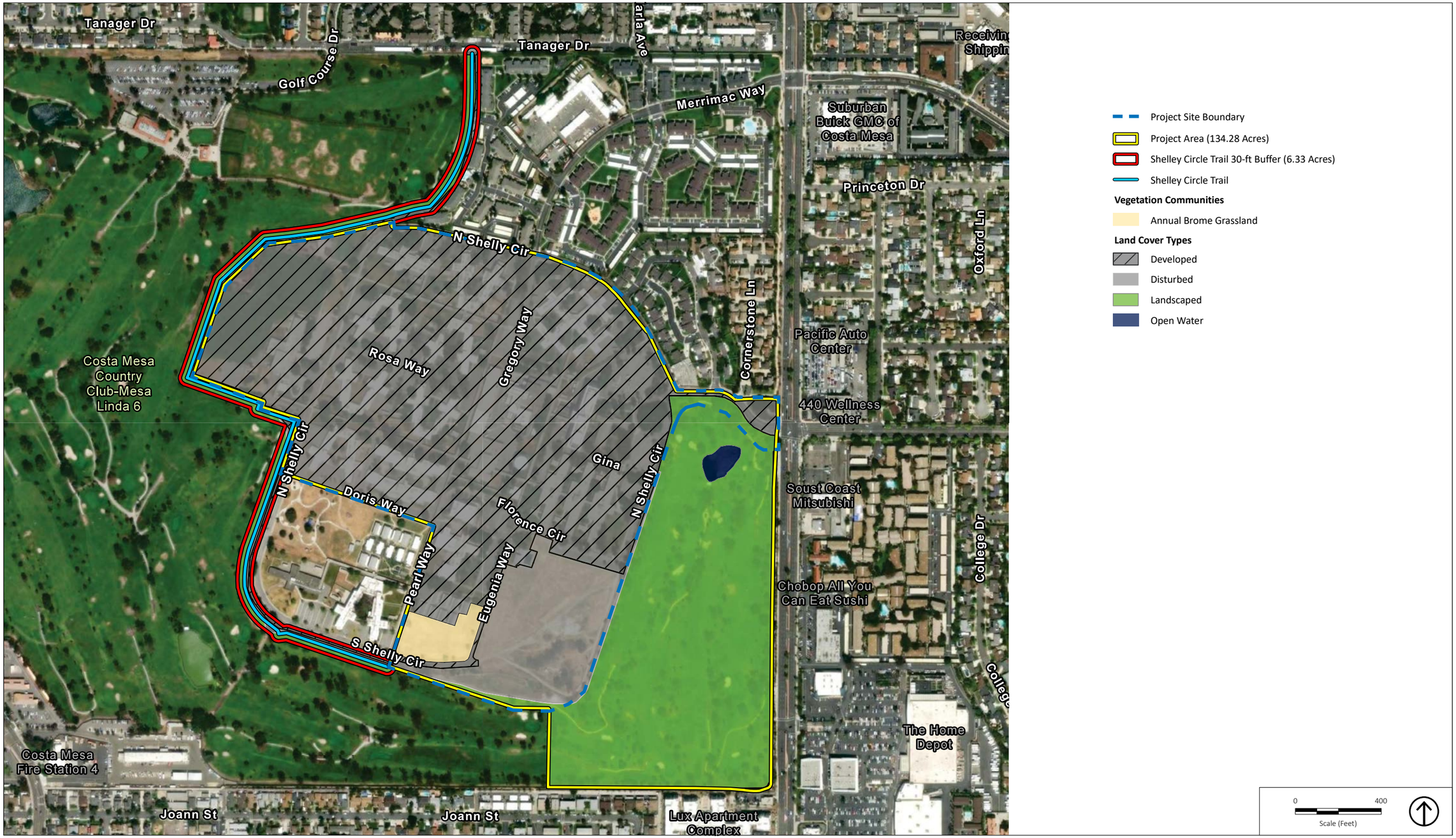
- **Developed**: Developed is a land cover type, not a vegetation community. Developed lands are those that are heavily affected by human use, including residential homes, commercial or industrial buildings and associated infrastructure, transportation corridors, and associated landscaping. Within developed areas, naturalized vegetation is often relatively

sparse and largely consists of ornamental, non-native species. ECORP classified the FDC, along with the commercial and residential areas, as developed. Some of the areas within the FDC include previously landscaped areas that are now vegetated with a mix of native and non-native herbaceous plant and grass species.

- **Open Water:** The classification open water is a land cover type, not a vegetation community, and is not restricted by elevation. Open water areas are those that have surface water present in the form of a river, lake, or other body of water. Within open water areas, vegetation is relatively sparse and limited to species that can tolerate long periods of inundation. A manmade freshwater pond that is concrete lined and supplied by irrigation linesis located in the northeastern portion of the Costa Mesa Country Club golf course.
- **Landscaped**: Landscaped is a land cover type, not a vegetation community. The landscaped classification includes areas where the main vegetation is continuous to non-continuous landscaped vegetation, such as ornamental trees, lawn shrubs, and grass; moreover, landscaped areas have little to no vegetation aside from landscaped vegetation. ECORP classified the area within the Costa Mesa Country Club golf course as landscaped. This area consists mostly of landscaped grass with clusters of ornamental trees and some non-native shrubs in planter areas. ECORP additionally identified landscaped areas within the FDC property and along the Shelley Circle Trail, which has low growing grass cover over the compact dirt road.

PLANTS AND SPECIAL STATUS PLANTS

Within many of the developed and landscaped areas, ornamental shrubs and trees were observed, including junipers (*Juniperus* spp), pines (*Pinus* spp), Peruvian pepper tree (*Schinus molle*), eucalyptus, Brazilian pepper tree (*Schinus terebinthifolius*), fan palm (*Washingtonia* spp.), and Chinese elm (*Ulmus parvifolia*). Due to the disturbed nature of the project site, the project site represents relatively low-quality habitat for most native plant species, including those that are common (see Appendix C.1 for a full list of plants observed on-site).



Source: ECORP Consulting 2025.

Figure 3.3-1
Vegetation Communities and Land Cover Types from the BRA

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Special Status Plants

The literature review and database searches for the project site found 38 special-status plant species. ECORP removed species with a CRPR Plant Rank of 3 or 4 from this analysis because these rankings are considered a review list and a watch list, respectively. Of those 38 species, 8 are federally and/or state listed, and 4 are covered (COV) in the OC NCCP/HCP. However, all 38 species are presumed absent from the project site due to a lack of suitable habitat and the high level of anthropogenic disturbance on the project site. A complete list of all 38 plant species and their special status are seen in Table 3.3-2, *Plant Species Presumed Absent* (Appendix C.1).

Table 3.3-2 Plant Species Presumed Absent

Common Name (Scientific Name)	Status	State and Federally listed
Chaparral sand-verbena (*Abronia villosa var. aurita*)	CRPR 1B.1	-
Aphanisma (Aphanisma blitoides)	CRPR 1B.2	-
Horn's milk-vetch (Astragalus hornii var. hornii)	CRPR 1B.1	-
Ventura Marsh milk-vetch (Astragalus pycnostachyus var. lanosissimus)	CRPR 1B.1	Endangered
Coulter's saltbush (Atriplex coulteri)	CRPR 1B.2	-
South coast saltscale (Atriplex pacifica)	CRPR 1B.2	-
Parish's brittlescale (Atriplex parishii)	CRPR 1B.1	-
Davidson's saltscale (Atriplex serenana var. davidsonii)	CRPR 1B.2	-
Intermediate mariposa lily (Calochortus weedii var. intermedius)	CRPR 1B.1, COV	-
Lucky morning-glory (*Calystegia felix*)	CRPR 1B.1	-
Southern tarplant (*Centromadia parryi ssp. australis*)	CRPR 1B.1	-
Orcutt's pincushion (*Chaenactis glabriuscula var. orcuttiana*)	CRPR 1B.1	-
Salt marsh bird's-beak (*Chloropyron maritimum ssp. Maritimum)*	CRPR 1B.1	Endangered
Summer holly (*Comarostaphylis diversifolia ssp. diversifolia*)	CRPR 1B.2	-
Many-stemmed dudleya (*Dudleya multicaulis*)	CRPR 1B.2	-
Laguna Beach dudleya (*Dudleya stolonifera*)	CRPR 1B.2, COV	Threatened

Table 3.3-2 Plant Species Presumed Absent

Common Name (Scientific Name)	Status	State and Federally listed
Santa Ana River woollystar (*Eryngium aristaulatum var. parishii*)	CRPR 1B.1	Endangered
San Diego button-celery (*Eryngium aristulatum var. parishii*)	CRPR 1B.1	Endangered
Cliff spurge (*Euphorbia misera*)	CRPR 2B.2, COV	-
Los Angeles sunflower (*Helianthus nuttallii ssp. parishii*)	CRPR 1A	-
Mesa horkelia (*Horkelia cuneata var. puberula*)	CRPR 1B.1	-
Decumbent goldenbush (Isocoma menziesii var. decumbens)	CRPR 1B.2	-
Coulter's goldfields (*Lasthenia glabrata ssp. Coulter)i*	CRPR 1B.1	-
Robinson's pepper-grass (Lepidium virginicum var. robinsonii)	CRPR 1B.1	-
Mud nama (*Nama stenocarpa*	CRPR 2B.2	-
Gambel's water cress (*Nasturtium gambelii*)	CRPR 1B.1	State: Threatened Federally**:** Endangered
Prostrate vernal pool navarretia (*Navarretia prostrata*)	CRPR 1B.2	-
Coast woolly-heads (*Nemacaulis denudata var. denudata*)	CRPR 1B.2	-
California Orcutt grass (*Orcuttia californica*)	CRPR 1B.1	Endangered
Allen's pentachaeta (*Pentachaeta aurea ssp. allenii*	CRPR 1B.1	-
Brand's star phacelia (*Phacelia stellaris*)	CRPR 1B.1	-
Nuttall's scrub oak (*Quercus dumosa*)	COV, CRPR 1B.1	-
Sanford's arrowhead (*Sagittaria sanfordii*)	CRPR 1B.2	-
Chaparral ragwort (*Senecio aphanactis*)	CRPR 2B.2	-
Salt spring checkerbloom (*Sidalcea neomexicana*)	CRPR 2B.2	-
Estuary seablite (*Suaeda esteroa*)	CRPR 1B.2	-

Table 3.3-2 Plant Species Presumed Absent

Common Name (Scientific Name)	Status	State and Federally listed
San Bernardino aster (*Symphyotrichum defoliatum*)	CRPR 1B.2	-
Big-leaved crownbeard (*Verbsina dissita*)	CRPR 1B.1	Threatened

Source: Appendix C.1

California Rare Plant Ranks:

1A Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere

1B Plants Rare, Threatened, or Endangered in California and Elsewhere

2A Plants Presumed Extirpated in California, But Common Elsewhere

2B Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere

3 Plants about which more information is needed; a review list.

4 Plants of limited distribution; a watch list.

CBR Considered but rejected

List Extensions:

.1 = Seriously threatened in California (over 80 percent of occurrences threatened / high degree and immediacy of threat)

.2 = Moderately threatened in California (20 to 80 percent occurrences threatened / moderate degree and immediacy of threat)

.3 = Not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known)

COV - Covered (COV) within the OC NCCP/HCP

WILDLIFE AND SPECIAL STATUS WILDLIFE

During the biological reconnaissance survey, biologists observed three mammal species: California ground squirrel (*Otospermophilus beecheyi*), coyote (*Canis latrans)*, and scat of desert cottontail (*Sylvilagus audubonii*); one reptile species: red-eared slider (*Trachemys scripta elegans*); one fish species: mosquitofish (*Gambusia affinis*); one butterfly species: monarch (*Danaus plexippus*); and 22 bird species, including northern mockingbird (*Mimus polyglottus*), black phoebe (*Sayornis nigricans*), and mourning dove (*Zenaida macroura*).

Special Status Wildlife

The literature review and database searches for the project site found 44 special-status wildlife species. Of these special-status wildlife species, ECORP observed one species during the biological reconnaissance survey: monarch butterfly. Although other special-status species were not observed within the project site during the biological resources survey, three species have a high potential to occur: Crotch's bumble bee (*Bombus crotchi*), Cooper's hawk (*Astur cooperii*), and western burrowing owl (*Athene cunicularia hypugaea*). Two species have a moderate potential to occur: white-tailed kite (*Elanus leucurus*) and western yellow bat (*Lasiurus*

xanthinus). Three species have a low potential to occur Riverside fairy shrimp (*Streptocephalus woottoni*), San Diego fairy shrimp (*Branchinecta sandiegonensis*), and western spadefoot (*Spea hammondii*). The remaining 35 species are presumed absent from the project site (Appendix C.1).

Wildlife Species Present within the Project Site

- **Monarch Butterfly**. The California overwintering population of monarch butterfly is federally proposed as threatened. A decision on the listing status is delayed due to other federal priority species; however, on December 12, 2024, USFWS proposed listing the monarch as threatened with a 4(d) rule, meaning the proposed threatened species would receive the same protection under the ESA as an endangered species. This species is highly associated with its larval host plant (milkweed [Asclepias spp.]) for breeding habitat and as a generalist forager, nectars on a variety of flowering plants and annuals. Most of the monarch overwintering sites in California are located within approximately 1.5 miles of the coast and provide very specific microclimate conditions that include dappled sunlight, freshwater, high humidity, and absence of freezing temperatures. ECORP observed two monarch individuals in flight during the biological reconnaissance survey. Additionally, ECORP identified suitable roosting habitat for the species in the stands of eucalyptus trees observed within the project site (Appendix C.1).

Wildlife Species with a High Potential to Occur

Three special-status wildlife species have a high potential to occur on the project site. Although they were not observed during the biological reconnaissance survey, suitable habitat exists on site, and documented occurrences have been reported within five miles of the project site.

- **Crotch's Bubble Bee**. The Crotch's Bumble Bee (CBB) is a state candidate for listing as Endangered under the California ESA. Crotch's bumble bee inhabits open grassland and scrub habitats and occurs primarily in California. Crotch's bumble bee primarily nests underground, though colony sizes have not been well documented. This species is a generalist forager and reportedly visits a variety of flowering plants including those in the family Fabaceae, Apocynaceae, Asteraceae, Lamiaceae, and Boraginaceae (Appendix C.1).

  ECORP observed marginally suitable habitat for CBB in the annual brome grassland habitat within the project site. Rodent burrows and a large mulch pile in the grassland provide potential nesting and overwintering habitat for the species; however, most burrows are occupied by members of a very large and active California ground squirrel colony. Non-native plants in the landscaped planters within the Costa Mesa Country Club golf course provide foraging habitat for CBB. ECORP identified two CNDDB records of CBB within 5 miles of the project site: the closest record (Occurrence #194) was documented in June 1941 and located approximately 1.9 miles south of the project site; the most recent record

(Occurrence #392) was documented in June 2020 and located approximately 4.5 miles northwest of the project site

- **Cooper's Hawk**. Cooper's hawk (*Astur cooperii*) is designated as a CDFW Watch List species. Cooper's hawks are commonly found in deciduous and mixed forests, where they can hunt smaller birds and find suitable nesting sites. Cooper's hawks have adapted to urban environments, often seen in parks, gardens, and residential neighborhoods. They typically build their nests in the forks of tall trees such as pines, oaks, and spruces. During the biological reconnaissance survey, ECORP observed one individual in the parking lot of the Costa Mesa Country Club golf course, approximately 0.16 mile from the project site. The tall ornamental trees present within the project site provide potential nesting habitat, and the open landscaped and annual brome grassland habitats provide open space for hunting.
- **Western Burrowing Owl**. Western burrowing owl (*Athene cunicularia hypugeaea*) is a state candidate for listing as Endangered under the California ESA and is a CDFW Species of Special Concern (SSC). The California Fish and Game Commission's one-year status review report on the petition to list western burrowing owl was expected for October 2025; however, a 6-month extension has been granted. Western burrowing owls utilize various natural and modified habitats, typically characterized by low-growing vegetation. Western burrowing owls utilize various natural and modified habitats, typically characterized by low-growing vegetation. Suitable western burrowing owl habitat includes, but is not limited to, abandoned and active agricultural use areas, native and non-native grassland, shrub lands with low-density shrub cover, drainage ditches, earthen berms, and disturbed open habitats including vacant lots in close proximity to human habitation. Western burrowing owls use uninhabited mammal burrows from species such as California ground squirrels and will also use natural rock cavities and human-made structures such as debris piles, earthen berms, openings beneath cement or asphalt pavement, or drainage culverts for shelter or nesting sites.

  ECORP observed suitable breeding, foraging, and wintering habitat for western burrowing owl in the annual brome grassland habitat within the project site. The grassland habitat is characterized by low-growing, non-native species with a very active colony of California ground squirrels, which provide potential western burrowing owl burrows and an abundance of prey. ECORP identified four CNDDB records of western burrowing owl within 5 miles of the project site: the closest record (Occurrence #874) was documented in 2006 and located approximately 0.4 mile west of the project site; the most recent record (Occurrence #2015) was documented in 2017 and located approximately 2.9 miles west of the project site.

Wildlife Species with a Moderate Potential to Occur

Two species have a moderate potential to occur on the project site. Although not observed during the biological reconnaissance survey, the following species have the potential to occur due to suitable or marginal habitat within the project site and either database records outside the five-mile radius or recent documented occurrences within five miles.

- **White-Tailed Kite**. White-tailed kite (*Elanus leucurus*) is a CDFW Fully Protected species. This species generally occurs in rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. It requires open grasslands, meadows, or marshes for foraging in proximity to isolated, dense-topped trees for nesting and perching.

  Marginally suitable nesting habitat is present in the mature trees scattered in the annual brome grassland habitat and in the landscaped areas within the project site. The active colony of California ground squirrels provides an abundance of prey. ECORP identified five recent CNDDB records of white-tailed kite within 5 miles of the project site: the closest record (occurrence #125) was an active nest at Newport Back Bay that was documented in 2007 and located approximately 2.7 miles southeast of the project site.

- **Western Yellow Bat**. Western yellow bat (Lasiurus xanthinus) is a CDFW SSC. This species occurs in riparian woodlands in arid regions, oak or pinyon-juniper woodlands, and human developed areas. Western yellow bat roost in trees, especially in fan palms with dead fronds.

  Suitable roosting habitat is present in the palm trees (with intact skirts) distributed throughout the project site. Despite a lack of recent nearby records, habitat strongly associated with this species is present within the project site.

Wildlife Species Present with a Low Potential to Occur

Three species have a low potential to occur on the project site. This determination is based on the presence of the species' habitat, and a known occurrence has been reported within the project site, but no records or historic records of the species were found within the database search

- Riverside fairy shrimp (*Streptocephalus woottoni*) – federally listed (Endangered), COV
- San Diego fairy shrimp (*Branchinecta sandiegonensis*) – federally listed (Endangered), COV
- Western spadefoot (*Spea hammondii*) – Proposed for federal listing (Threatened), CDFW SSC, COV

Wildlife Species Presumed Absent

Thirty-five wildlife species were not present within the project site during the biological reconnaissance survey, and/or habitat within the project site was not present or suitable. Some species had historic or recent sightings; however, due to the lack of suitable habitat within the project site, the fragmented nature, and the high level of anthropogenic disturbance present within the project site, ECORP presumes these species absent.

A complete list of all 38 plant species and their special status are seen in Table 3.3-3, *Plant Species Presumed Absent* (Appendix C.1).

Table 3.3-3 Plant Species Presumed Absent

Common Name (Scientific Name)	Status	State and Federally listed
Chaparral sand-verbena (*Abronia villosa var. aurita*)	CRPR 1B.1	-
Aphanisma (Aphanisma blitoides)	CRPR 1B.2	-
Horn's milk-vetch (Astragalus hornii var. hornii)	CRPR 1B.1	-
American badger (*Taxidea taxus*)	SSC	-
American peregrine falcon (*Falco peregrinus anatum*)	COV	Delisted
Bank swallow (*Riparia riparia*) (nesting)	-	Threatened
Belding's savannah sparrow (*Passerculus sandwichensis beldingi*)	-	State: Endangered
Big free-tailed bat (*Nyctinomops macrotis*)	-	SSC
Black skimmer (*Rynchops niger*)	-	SSC
California black rail (*Laterallus jamaicensis coturniculus*)	CDFW Fully Protected)	Threatened
California least tern (*Sternula antillarum browni*)	CDFW Fully Protected	Endangered
Coast horned lizard (*Phrynosoma blainvillii*)	SSC, COV	-
Coastal cactus wren (Campylorhynchus brunneicapillus sandiegensis)	SSC, COV	-
Coastal California gnatcatcher (*Polioptila californica californica*)	SSC, COV	Federally: Threatened
Grasshopper sparrow (*Ammodramus savannarum*)	SSC	-
Green sea turtle (*Chelonia mydas*)	-	Threatened
Least Bell's vireo (*Vireo bellii pusillus*)	COV	Endangered
Light-footed Ridgeway's rail (*Rallus longirostris levipes*)	Fully Protected	Endangered
Mexican long-tongued bat (*Choeronycteris mexicana*)	SSC	-
Pacific pocket mouse (*Perognathus longimembris pacificus*)	SSC, COV	Federally: Endangered

Table 3.3-3 Plant Species Presumed Absent

Common Name (Scientific Name)	Status	State and Federally listed
Quino checkerspot butterfly (*Euphydryas editha quino*) –),	COV	Federally: Threatened
Red-diamond rattlesnake (*Crotalus ruber*)	SSC, COV	-
Santa Ana sucker (*Catostomus santaanae*)	SSC	Federally: Threatened
South coast marsh vole (*Microtus californicus stephensi*)	SSC	-
Southern California legless lizard (*Anniella pallida*)	SSC	-
Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*)	Watch List, COV	-
Southern California saltmarsh shrew (*Sorex ornatus salicornicus*)	SSC	-
Southwestern pond turtle (*Actinemys pallida*)	SSC	Proposed Federally: Threatened
Steelhead – southern California distinct population segment (*Onchorhynchus mykiss irideus*)	-	Endangered
Swainson's hawk (*Buteo swainsoni*)	-	State: Threatened
Tidewater goby (*Eucyclogobius newberryi*)	SSC	Federally: Endangered
Tricolored blackbird (*Agelaius tricolor*) (nesting colony)	SSC	State: Threatened
Western mastiff bat (*Eumops perotis californicus*)	SSC	-
Western snowy plover (*Anarhynchus nivosus nivosus*)	SSC	Federally (Threatened
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) (nesting)	-	State: Endangered) Federally: Threatened
Yellow-breasted chat (*Icteria virens*)	SSC	-
Yellow rail (*Coturnicops noveboracensis*)	SSC	-
Yellow warbler (*Setophaga petechia*)	SSC	-

Source: Appendix C.1

California Rare Plant Ranks:

1A Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere

1B Plants Rare, Threatened, or Endangered in California and Elsewhere

2A Plants Presumed Extirpated in California, But Common Elsewhere

2B Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere

3 Plants about which more information is needed; a review list.

4 Plants of limited distribution; a watch list.

CBR Considered but rejected

List Extensions:

.1 = Seriously threatened in California (over 80 percent of occurrences threatened / high degree and immediacy of threat)

.2 = Moderately threatened in California (20 to 80 percent occurrences threatened / moderate degree and immediacy of threat)

.3 = Not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known)

COV - Covered (COV) within the OC NCCP/HCP

CDFW

SSC – Species of Special Concern

Fully Protected

Watch List

RAPTORS AND MIGRATORY BIRDS

Potential nesting habitat for migratory birds and raptors protected by the MBTA and California Fish and Game Code occurs throughout the project site in the form of landscaped, ornamental, and mature trees of various heights, landscaped shrubs, and buildings. Suitable nesting habitat for ground-nesting bird species, such as mourning doves, also occurs within the project site. Due to the presence of suitable nesting habitat, nesting native and migratory birds and raptors could use the project site during the nesting bird season (typically February 1 through August 31) (Appendix C.1).

SENSITIVE NATURAL COMMUNITIES

ECORP did not observe sensitive natural communities within the project site during the biological reconnaissance survey (Appendix C.1).

JURISDICTIONAL WETLANDS AND WATERS

The desktop review of the NRCS Hydric Soils List identified no hydric soils on the project site. Open water areas have surface water present in the form of a river, lake, or other body of water. ECORP identified one freshwater pond feature on the project site during the review of the National Wetlands Inventory Mapper. This pond is a human-made feature on the Costa Mesa Country Club golf course that is concrete lined and irrigated. A formal aquatic resources delineation for the project site has not been conducted, due to the unknown extent of earthwork activities associated with the golf course reconfiguration at this time (Appendix C.1).

WILDLIFE MOVEMENT CORRIDORS, LINKAGES, AND NATIVE WILDLIFE NURSERY SITES

The project site is bounded by the Costa Mesa Country Club golf course to the northwest, south, west, and east, and residential and commercial development to the northeast and east along Harbor Boulevard. Although the project site does allow for the movement of local wildlife, it most likely does not facilitate the regional movement of wildlife because the roadways and surrounding development create a physical barrier. Therefore, ECORP does not anticipate impacts to wildlife movement due to development of the project. Also, the project site was determined not to be a location of a potential wildlife nursery site (Appendix C.1).

HABITAT CONSERVATION PLANS AND NATURAL COMMUNITY CONSERVATION PLANS

The project site is in the northwestern portion of the County of Orange Central & Coastal Subregion Natural Communities Conservation Plan/Habitat Conservation Plan (OC NCCP/HCP) area but is not in any designated reserve, conservation easement, special linkage, existing use, or non-reserve open space. In addition, the City of Costa Mesa is not a signatory of the OC NCCP/HCP (Appendix C.1).

TREE SURVEY AND ARBORIST REPORT

Field surveys were performed November 12 through December 21, 2025, in the FDC and in the area of the Costa Mesa Country Club Golf Course (Golf Course) that is part of the project site's off-site improvement area. As part of these surveys, details of each tree were recorded, documenting species, stature, health, indication of disease, local environment, and conditions in which they occur. A total of 1,152 trees were assessed as part of the survey. There are 423 trees within the survey area of the Mesa Linda Golf Course (holes 6–15). There are 970 trees on the FDC property but 241 were not assessed because 7 have died, 123 were omitted due to a separate project (the Southern Regional Emergency Operations Center project), and 111 are outside the Specific Plan tree survey boundary. The four most prominent species surveyed were Brazilian pepper (*Schinus terebinthifolia*), Indian laurel fig (*Ficus microcarpa*), River she-oak (*Casuarina cunninghamiana*), and lemon scented gum (*Corymbia citriodora*), which made up 26.4 percent of the total tree population. The native species observed during the surveys include western sycamore (*Platanus racemosa*), Port Orford cedar (*Chamaecyparis lawsoniana*), coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Goodding's willow (*Salix gooddingii*), toyon (*Heteromeles arbutifolia*), and California fan palm (*Washingtonia filifera*), totaling 27 trees and comprising 2.3 percent of the trees assessed. In addition, as many as 15 trees were planted in memory of individuals (on FDC or Golf Course). No other trees within the property are anticipated to qualify as a special status tree based on the City's

Municipal Code. As many as 21 trees that were assessed were dead, not including the 7 dead trees that were not assessed. In addition, 529 trees (45.9 percent) are poor candidates for preservation and need to be removed due to advanced disease, increased risk of significant failure, and decline.

The remaining 623 trees are healthy or potentially treatable and can be preserved as part of the proposed project. All trees that are intended for removal as part of a project require a removal permit and must be approved by the City Economic and Development Director. The City Economic and Development Director must also approve final mitigation involving the number of trees being replaced, the tree species, and size (Appendix C.2).

3.3.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact on biological resources if it would:

a) Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan.

METHODOLOGY

Biological Resources Technical Report

Literature Review

Prior to conducting the biological reconnaissance survey, ECORP biologists performed a literature review using CDFW's California Natural Diversity Database (CNDDB) and the California Native Plant Society's (CNPS) Electronic Inventory (CNPSEI) to determine the special-status plant and wildlife species that have been documented near the project site. The CNDDB and CNPSEI contain records of reported occurrences of federally and/or state-listed endangered, threatened, and proposed endangered or threatened species; CDFW species of special concern (SSC); CDFW fully protected species; California Rare Plant Rank (CRPR) species; and other special-status species and habitat within or near the project site. The literature review gathered additional information from other sources, including State and Federally Listed Endangered and Threatened Animals of California, Special Animals List, USFWS Information Planning and Consultation (IPaC) System, *The Jepson Manual: Vascular Plants of California* (2nd edition), Jepson eFlora, *A Manual of California Vegetation* (2nd edition), National Wetlands Inventory Mapper, various online websites, and the previous biological report on the project site. Such information assisted in identifying the potential habitats, streams/drainages, and species on-site as well as their potential to be on-site.

Biological Reconnaissance Survey

ECORP biologists conducted a biological reconnaissance survey by walking all accessible areas of the project site to identify vegetation communities and wildlife habitat. They documented observed plant and wildlife species, evaluated habitat suitability for special-status species, and noted features potentially subject to USACE, RWQCB, and/or CDFW jurisdiction (no formal aquatic delineation was conducted). Data were recorded using ArcGIS Field Maps with GPS-enabled devices, field notes, maps, and photographs.

The site's potential to support wildlife movement was also assessed. Vegetation communities were mapped using field observations and aerial imagery in accordance with CDFW protocols and classified to the alliance level per *A Manual of California Vegetation*, with professional judgment applied as needed. ECORP recorded all observed plant and wildlife species; for any special-status or protected species observed, ECORP documented the date, location, habitat, and GPS coordinates.

Tree Survey and Arborist Report

The 2024 Tree Survey and Arborist report was conducted for the Full FDC property (Appendix C.3). The 2024 Tree Survey and Arborist report evaluated 970 trees on the FDC property; however, the proposed project's site boundary is not consistent with the full FDC property.

The 2026 Tree Survey and Arborist report included the 2024 Tree Survey and Arborist report as an initial reference and starting point (see Appendix C.2). The 2026 Tree Survey and Arborist report provided an updated assessment of the trees assessed in the 2024 Tree Survey and Arborist report, and provided additional surveys for the off-site improvement areas affected by the proposed project. During the 2026 Tree Survey and Arborist report tree tags removed during prior construction or safety work were provided by FDC Administration and cross-referenced with the 2024 appendix and GPS waypoint (GPX) data to ensure all project site trees were located and assessed. Tree locations were identified using aerial imagery, Google Earth KMZ files, a Garmin GPSMAP 66sr, and a GPS-enabled smartphone with digitized project boundaries; data were exported to GIS. Aluminum numeric tags were affixed to trees, and existing tags were retained. Crown width was measured with a laser device or estimated by pacing, and height was visually estimated using a tangent height gauge. An International Society of Arboriculture (ISA) Certified and American Society of Consulting Arborists (ASCA) Registered Consulting Arborist (George Wirtes, RCA #738) evaluated tree condition from the ground using binoculars, and data were recorded on field sheets. Outside the project boundary, only trees with substantial encroachment into the site were assessed due to their potential risk to the project area.

No invasive procedures were performed. Trees were evaluated based on visible conditions, including root crown, stem, and canopy characteristics, which were recorded and photographs were taken as needed. Each tree was assigned a Health/General Appearance rating (1: Good to 4: Decline/Dead) and a Stature rating (1: Good to 4: Hazardous). Site constraints, such as utilities, fencing, adjacent canopy competition, and grade changes, were also considered.

3.3.4 Project Impact Analysis

a) Would the project have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The proposed project includes construction of the FDC Specific Plan, which includes the future development of a mixed-use community on the 95-acre project site and off-site improvements on an additional 45.61 acres (secondary access roadway, and reconfiguration of up to six holes at the Costa Mesa Municipal Golf Course). Implementation of the proposed project could directly or indirectly harm a sensitive candidate, sensitive, or special status species, see the discussion below.

The project site is primarily developed with the FDC and disturbed with a former staging site; it contains landscaping and open water in the golf course and a small area of one vegetation community, the annual brome grassland (see Figure 3.3-1).

Special Status Plants

CDFW considers annual brome grassland a semi-natural stand, and a global and state rarity rank is not applicable. Due to its disturbed nature, the project site represents relatively low-quality habitat for most native plant species, including those that are common. As a result of the analysis, ECORP presumes that all 38 species with potential to occur on-site, based on a literature review and database searches, are absent from the project site due to a lack of suitable habitat and the high level of anthropogenic disturbance within the project site.

Special Status Wildlife

Of the 44 wildlife species identified in the literature review, one species was observed during the biological reconnaissance survey, monarch butterfly. Additionally, three species have a high potential to occur within the project site—Crotch's bumble bee, Cooper's hawk, and Western burrowing owl; and two species have a moderate potential to occur, White-tailed kite and Western yellow bat.

Three species have a low potential to occur within the project site, Riverside fairy shrimp, San Diego fairy shrimp, and western spadefoot. The remaining 35 species are presumed absent from the project site. The special-status wildlife species analyzed to have a low potential to occur or presumed them absent due to the lack of suitable habitat occurring within the project site. Therefore, species of a low potential to occur, or those presumed absent, are not expected to occur within the project site, and impacts to these species are not anticipated as a result of the proposed project.

Wildlife Species Present within the Project Site

- **Monarch Butterfly**. ECORP observed two monarch individuals in flight during the biological reconnaissance survey and identified suitable roosting habitat for the species within the project site. The Monarch Butterfly is federally proposed as Threatened species. Therefore, implementation of the proposed project would have the potential to impact a special status species, the Monarch Butterfly.

Wildlife Species with a High Potential to Occur

- **Crotch's Bumble Bee** . A suitable habitat on the project site for the CBB was identified ECORP. CBB is a state candidate for listing as Endangered under the California ESA species. Therefore, implementation of the proposed project would have the potential to impact a special status species, the CBB.
- **Cooper's Hawk.** ECORP observed one Cooper's hawk individual in the parking lot of the Costa Mesa Country Club golf course, approximately 0.16 mile from the project site. ECORP identified the tall ornamental trees present within the project site as providing a potential nesting habitat, and the open landscaped and annual brome grassland habitats provide

open space for hunting. The Cooper's hawk is a CDFW Watch List species. Therefore, implementation of the proposed project would have the potential to impact a special status species, the Cooper's hawk.

- **Western Burrowing Owl.** Suitable habitat for Western burrowing owl, a state candidate for listing as Endangered under the California ESA and is a CDFW SSC, is present within the project site in the annual brome. California ground squirrel colonies provide suitable burrows and adequate forage for the species. Therefore, implementation of the proposed project would have the potential to impact a special status species, the western burrowing owl.

Wildlife Species with a Moderate Potential to Occur

- **White-Tailed Kite**. Suitable nesting habitat for white tailed kite is present in the tall ornamental trees within the project site. The white-tailed kite is listed by the CDFW as a Fully Protected species. Therefore, implementation of the proposed project would have the potential to impact a special status species, the white-tailed kite.

- **Western Yellow Bat.** Suitable roosting habitat for western yellow bat is present in the palm trees (with intact skirts) scattered throughout the project site. The western yellow bat is listed as an SSC by CDFW. Therefore, implementation of the proposed project would have the potential to impact a special status species, the white-tailed kite.

Construction of the proposed project has the potential to adversely impact suitable habitat for special status wildlife species. Therefore, this impact is **potentially significant**.

Significance without Mitigation: Potentially Significant.

Impact BIO-1: Construction of the project site may impact suitable habitat for the Crotch's bumble bee and the western burrowing owl; suitable nesting habitat for the Cooper's hawk and white-tailed kite; and suitable roosting habitat for the western yellow bat and monarch butterfly.

> **Mitigation Measure BIO-1a: Overwintering Monarch Monitoring Surveys and Habitat Management Plan**. A minimum of three overwintering surveys shall be conducted by a qualified biologist familiar with the identification of monarchs and overwintering roosts in order to optimize detection of an overwintering grove; one early-season count between mid-October and mid-November; one mid-season count between mid-November and mid-December; and one late-season count between mid-December and mid-January. The survey shall be conducted early in the morning when temperatures are below 55°F and continue beyond cool morning temperatures in order to detect monarchs as they begin to warm and leave the roost. The number of monarchs and the

location at each cluster, as well as the number of monarchs observed in flight, shall be recorded in addition to start and end time and conditions. Surveys shall not be conducted during inclement conditions (i.e., heavy precipitation, strong winds, and fog).

If the project site is determined to support an overwintering monarch colony—for the purposes of this analysis, defined as greater than or equal to three adult monarch butterflies perched in a single tree during the overwintering season or greater than or equal to five adult monarch butterflies observed in the immediate vicinity of a grove of trees during the overwintering season—a qualified biologist shall prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified monarch biologist. At a minimum, the Monarch Butterfly Overwintering Habitat Management Plan shall include project-specific protection measures, management, enhancement, and restoration elements; restrictions for pesticide use; and restrictions for future plantings of tropical milkweed to reduce pathogens.

Mitigation Measure BIO-1b: **Focused Crotch's Bumble Bee Surveys**. If CBB are still a candidate for listing or have become a listed species, a minimum of three focused CBB surveys shall be conducted within areas identified as potential CBB nectaring and nesting habitat following the timing and methods described in CDFW's *Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species*. Surveys shall be conducted during the colony active period (April through August) the season prior to Project implementation within the Project Site and a 50-foot buffer during appropriate survey conditions to maximize aboveground detection (daylight hours at least 1 hour after sunrise and two hours before sunset when ambient temperatures are between 60°F to 90°F, sustained winds are less than 8 miles per hour, and when the surveyor's shadow can be seen). Surveys shall focus on detection of CBB at foraging patches and shall be at a level to detect CBB nests. Detection of CBB shall be reported to CDFW prior to start of construction, and, if avoidance cannot be achieved, a CBB Avoidance Plan shall be prepared by a qualified biologist, and an application for an Incidental Take Permit would be necessary.

Mitigation Measure BIO-1c: Pre-construction Nesting Bird Surveys. Whenever feasible, any ground-disturbing activities shall be conducted outside of the breeding season for birds (approximately January 15 through August 31 for raptors and February 1 through September 15 for songbirds). This shall avoid violations of the MBTA and California Fish and Game Code Sections 3503, 3503.5, and 3513. If activities with the potential to disrupt nesting birds are scheduled to occur during the breeding season, a pre-construction survey for nesting birds shall be conducted by a qualified avian biologist who is knowledgeable of the bird species occurring in the region and is experienced

surveying for and identifying the common and special-status bird species with potential to occur.

The survey shall occur no more than 3 days prior to the start of ground-disturbing activities. The nesting bird survey shall include the project site and adjacent areas (500-foot buffer) where project activities have the potential to cause nest failure. If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors), are found to be present, avoidance or minimization measures shall be undertaken to avoid potential project-related impacts. Measures may include seasonal work restrictions or establishment of a non-disturbance buffer around each active nest until nesting has been completed, as determined through periodic nest monitoring by the qualified avian biologist. The size of the non-disturbance buffer shall be determined by the qualified avian biologist. Typically, this is 300 feet from the nest site in all directions (500 feet is typically recommended by CDFW for listed species and raptors), until the juveniles have fledged and there has been no evidence of a second attempt at nesting. Once nesting is deemed complete by the qualified avian biologist, work may resume within the buffer.

Multiple pre-construction nesting bird surveys may need to be conducted to account for different project activities commencing in various areas of the project site or to account for any lapse in project activities during the breeding season.

Mitigation Measure BIO-1d: Focused Western Burrowing Owl Breeding Season and Pre-construction Surveys. Prior to the start of construction, four breeding season surveys for western burrowing owl shall be conducted within areas identified as potential western burrowing owl habitat (the annual brome grassland habitat in the southern portion of the project site) following the timing and methods described in the CDFW's *Staff Report on Burrowing Owl Mitigation*. In accordance with these guidelines, one survey shall be conducted between February 15 and April 15, a minimum of three survey visits, at least three weeks apart, shall be performed between April 15 and July 15, and at least one visit shall be completed after June 15. The surveys shall be conducted by a qualified biologist or team of qualified biologists familiar with the identification of western burrowing owls and owl sign. Pedestrian transects spaced 7 to 20 meters apart shall be walked throughout the annual brome grassland habitat in the southern portion of the project site. The qualified biologist(s) shall scan for owls at the start of each transect and every 100 meters. Surveys shall be conducted under suitable weather conditions and at times that provide the highest opportunity for detection for this species (e.g., between morning civil twilight and 10:00 a.m. or between two hours before sunset until evening civil twilight). Suitable burrows and cavities (e.g., rock cavities, pipes, culverts, and debris piles) 4 inches or greater in diameter detected during

surveys shall be examined for western burrowing owl sign (i.e., owl pellets, prints, molting feathers, and abundant insect remains). The locations of all western burrowing owl(s), potentially active burrows, and sign shall be recorded using a GPS device. The results of the survey shall be summarized in a survey report as outlined by CDFW's *Staff Report on Burrowing Owl Mitigation* and submitted to the City, and owl detections shall be reported directly to CDFW through submittal of CNDDB field survey forms within 45 days of completion of all four surveys and prior to project implementation.

In addition to focused breeding season surveys, pre-construction surveys for western burrowing owl shall be conducted prior to work beginning within all areas of suitable and marginal habitat identified within the project site, regardless of the time of year that construction is scheduled to begin. Survey methods shall follow those outlined within CDFG's Staff Report on Burrowing Owl Mitigation. The surveys shall be conducted by qualified western burrowing owl biologists who are experienced in surveying for and identifying western burrowing owl individuals and their sign. CDFW recommends that two pre-construction surveys take place: one within 14 to 30 days and the second within 24 hours of the start of ground-disturbing activities (including vegetation removal, clearing and grubbing, and grading, etc.). If western burrowing owl have colonized the project site prior to the initiation of construction, CDFW shall immediately be informed, and consultation with CDFW shall be required prior to initiating ground disturbance. If unavoidable impacts to the species will occur from the project, additional avoidance and minimization measures may need to be implemented, such as seasonal restrictions to work activities, and the appropriate permission from CDFW may need to be obtained prior to the start of project activities. If no western burrowing owl or occupied burrows (with sign) are observed during the pre-construction survey, project activities may commence, and no additional protection measures would be necessary.

Mitigation Measure BIO-1e: Bat Habitat Assessment and Bat Management Plan. Prior to the start of construction, a qualified biologist shall conduct a bat habitat assessment for suitable bat roosting habitat prior to any building demolition or tree-removal activities. The habitat assessment shall be conducted at least one year prior to the initiation of removal/demolition activities. If no suitable roosting habitat is identified, no further measures shall be necessary. If suitable roosting habitat and/or signs of bat use are identified during the assessment, the roosting habitat shall be avoided and consultation with CDFW shall be initiated prior to the commencement of construction activities. A Bat Management Plan shall be prepared and include specific avoidance and minimization measures to reduce impacts to roosting bats. The Project-specific Bat Management Plan may include any of the following, as necessary and appropriate to the findings of the habitat assessment: emergence and/or pre-construction surveys for roosting bats including acoustic monitoring, roost removal timing and methodology, no-disturbance buffers, passive exclusion of bats, and/or species-specific replacement

mitigation habitat. If trees scheduled for removal/modification (i.e., trimming) or structures (i.e., culverts) are determined to be suitable for bat roosting, or if work is expected to occur within 100 feet of these areas, these activities shall be scheduled outside of the bat maternity season (generally April 1 through August 31) to the greatest extent feasible. Work activities shall occur between September 1 and February 28/29 or when evening temperatures are not below 45°F and rain is not more than 0.50 inch within 24 hours. If work is expected to occur outside of the bat maternity season (during conditions that meet the parameters described above), work adjacent to bat habitat may continue without additional survey efforts. If trees with suitable bat roosting habitat are scheduled for removal during this time frame, removal using the two-step method shall be conducted:

- Vegetation and trees within the area that are not suitable for roosting bats shall be removed first to provide a disturbance that might reduce the likelihood of bats using the habitat.
- Two-step tree removal shall occur over 2 consecutive days under the supervision of a qualified bat biologist. On Day 1, small branches and small limbs containing no cavity, crevice, or exfoliating bark habitat on trees (or outer fronds in the case of palm trees), as identified by a qualified bat biologist, shall be removed first, using chainsaws only (i.e., no dozers or backhoes). The following day (Day 2), the remainder of the tree shall be felled/removed. The intention of this method is to disturb the tree with noise, vibration, and branch removal on Day 1, which should cause any potentially present day-roosting bats to abandon the roost tree after they emerge for nighttime foraging. Removing the tree quickly the next consecutive day should avoid reoccupation of the tree by bats.
- If tree removal/modification or work within 100 feet of suitable trees or suitable structures must occur during the maternity season, a qualified bat biologist shall conduct a focused emergence survey(s) of the tree(s) within 48 hours of scheduled work. If a maternity roost is located, whether solitary or colonial, that roost shall remain undisturbed until after the maternity season or a qualified biological monitor has determined that the roost is no longer active.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measures (MMs) BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e would implement species-specific surveys and prescribe management plans in the event such species are discovered. Compliance with the CDFW regulations and implementation of MMs BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e would ensure that impacts associated with candidate, sensitive, or special status species identified as having a potential to occur on the project site are less than significant.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

As discussed in 3.3(a), the project site only has one area identified as a vegetation community, the annual brome grassland shown on Figure 3.3-1. CDFW considers annual brome grassland a semi-natural stand, and a global and state rarity rank is not applicable. ECORP did not observe sensitive natural communities within the project site during the biological reconnaissance survey; therefore, no impacts to sensitive natural communities would occur. In addition, the Biological Technical Report did not identify a riparian habitat or indicate the presence of any streams or rivers that traverse the project site (Appendix C.1). Therefore, **no impacts** would occur.

Significance without Mitigation: No Impact.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Based on the Biological Technical Report, one freshwater pond feature on the biological reconnaissance survey area was identified during the review of the National Wetlands Inventory Mapper. This pond is a human-made feature that is concrete lined and supplied with irrigation lines on the Costa Mesa Country Club golf course, outside the project site boundary, but within an off-site improvement area (Appendix C.1).

Construction in this area would be limited to off-site improvements associated with the reconfiguration of the golf course to accommodate the secondary access roadway. However, this area is outside of the Specific Plan boundaries, and it has not yet been determined whether or not the changes to the golf course (i.e., tee, fairway, rough, hazards, green, or hole) would impact this human-made water feature. Because the limits of work associated with the golf course reconfiguration are unknown and considered speculative; a formal aquatic resources delineation, coordination with the agencies (USACE, RWQCB, and/or CDFW) by the permittee, for the project site was not conducted for this program-level EIR due to the unknown extent of earthwork activities associated with the golf course reconfiguration at this time. In the event that the modifications to the golf course affect this man-made water feature, and if the water feature is determined to contain jurisdictional features (such as jurisdictional waters), off-site improvements associated with the proposed project could impact a riparian resource. Therefore, out of an abundance of caution, this impact is conservatively considered **potentially significant**.

Significance without Mitigation: Potentially significant impact.

Impact BIO-2. Construction and operation of the proposed project may have an impact on an unknown aquatic resource (potential wetland).

> **MM BIO-2: Aquatic Resources Delineation**. If construction within the Costa Mesa Country Club golf course would disturb the freshwater pond identified in the Biological Resources Technical Report, prior to the start of construction, a formal aquatic resources delineation shall be conducted by a qualified biologist to delineate the boundaries of all aquatic features present within the biological reconnaissance survey area for the offsite golf course improvements.
>
> The aquatic resources delineation shall be conducted in accordance with the methodology outlined in the USACE "Wetlands Delineation Manual," the "Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region," and "A Field Guide to the Ordinary High Water Mark in the Arid West Region of the Western United States." The delineation shall also comply with the standards required by CDFW and RWQCB. If it is determined that potentially regulated aquatic resources are absent from the golf course site, no other measures shall be recommended.
>
> If there are any planned project-related impacts to potential jurisdictional aquatic features, coordination with the agencies (USACE, RWQCB, and/or CDFW) by the permittee shall be initiated. Depending on the nature of project activities, authorization for project impacts may be required, including USACE Section 404, RWQCB Section 401, and/or CDFW Section 1600 permitting. Regulatory agencies may require compensatory mitigation for project impacts through the permit process. Mitigation could take the form of payment of an in-lieu fee, participation in a mitigation banking program, or some form of on-site or off-site restoration. The exact details of mitigation, such as type, location, and mitigation ratio, shall be determined through consultation with the regulatory agencies during the permitting process.

Significance with Mitigation: Significant and Unavoidable. It has not been determined whether or not the changes to the golf course (i.e., tee, fairway, rough, hazards, green, or hole) would impact this man-made water feature. Therefore, at this programmatic stage, a formal aquatic resources delineation for the project site was not conducted. Implementation of MM BIO-2 would require a formal aquatic resources delineation if modifications to the golf course affect this aquatic feature. Based on a conservative approach, in the event an aquatic resource (i.e., wetlands) is delineated and would be impacted by the changes to the golf course (i.e., tee, fairway, rough, hazards, green, or hole), the proposed project could significantly impact such aquatic resources.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?

Although, the project site does allow for the movement of local wildlife, the project site likely does not facilitate the regional movement of wildlife because the roadways and development create a physical barrier, and therefore, construction of the proposed project is not anticipated to impact wildlife movement corridors. In addition, the project site was not determined to be a location of a potential wildlife nursery site, thus, no impacts would occur.

However, the project site provides a suitable nesting habitat for ground-nesting bird species, such as mourning doves, within the project site. Construction or ground-disturbing activities may occur during the nesting bird season (typically February 1 through August 31) for nesting native and migratory birds and raptors at the project site. Therefore, this impact is **potentially significant**.

Significance without Mitigation: Potentially Significant.

Impact BIO-3: The construction phase of the proposed project could impact nesting native and migratory birds and raptors at the project site.

Mitigation Measure: Implement Mitigation Measure BIO-1c.

Significance with Mitigation: Less than significant. Mitigation Measure BIO-1c (MM BIO-1c) states that in order to minimize impacts to nesting birds, vegetation clearing or ground-disturbing activities should be conducted outside of breeding season (approximately January 15 through August 31 for raptors and February 1 through September 15 for songbirds) to limit impacts to nesting birds. If activities with the potential to disrupt nesting birds need to take place during breeding season, a pre-construction nesting bird survey(s) will be required to remain in compliance with the MBTA. Compliance with the MBTA, CDFW regulations, and implementation of Mitigation Measure BIO-1c (MM BIO-c1) would ensure that impacts associated with the implementation of the proposed project are **less than significant after mitigation**.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Costa Mesa's Municipal Code Chapter 5 (Title 15), Parkway Trees, and Chapter 7 (Title 13), Landscaping Standards, establishes landscaping standards for removal of trees in the City. Therefore, the FDC Specific Plan conducted a survey of trees within the plan area that could be impacted by the proposed project. A total of 1,152 trees were assessed as part of the Arborist Report (see Appendix C.2). There are 423 trees within the survey area of the Mesa Linda Golf

Course (holes 6–15). There are 970 trees on the FDC property but 241 were not assessed because 7 have died, 123 were omitted due to a separate project, and 111 are outside the Specific Plan tree survey boundary. Of the 1,152 trees assessed, 21 were dead, and 529 contained advanced disease with a recommendation for removal. The remaining 623 trees are healthy or potentially treatable and can be preserved as part of the proposed project. As many as 15 trees within the property were planted in memory of individuals (FDC or the Golf Course). No trees within the property are anticipated to qualify as a special status tree based on the City's Municipal Code.

The City's Municipal Code requires that trees that are intended for removal as part of a project require a removal permit and must be approved at the discretion of the City Economic and Development Director. The Specific Plan Chapter 6, *Open Space, Landscaping & Public Art*, requires that existing trees removed during development shall be replaced on-site at a ratio of two new trees for every one tree that is removed. Existing trees may be boxed and relocated on-site. Therefore, the Specific Plan requires that trees shall be replaced consistent with City requirements.

The proposed project would comply with municipal requirements that would be subject to approval by the City Economic and Development Director to ensure trees on-site are replaced consistent with City requirements. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan?

The project site is within the OC NCCP/HCP boundaries; however, the City is not a signatory of the OC NCCP/HCP (Appendix C.1). There are no similar approved plans at the local, regional, state, or federal level for the project site or adjacent areas. Therefore, development of the proposed project would have **no impact** on an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

Significance without Mitigation: No Impact.

3.3.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to biological resources?

The area considered for cumulative impacts to biological resources is the OC NCCP/HCP boundaries. The City is not a member (signatory) of the OC NCCP/HCP. No sensitive plants,

riparian habitat, or other sensitive natural communities occur on-site. Given the built-out nature of the project area and the site's proximity to major roads and residential development, the project site also does not provide any significant function as a wildlife habitat, wildlife corridor or wildlife movement area.

However, development of the proposed project could impact the suitable habitat for the Crotch's bumble bee and the Western burrowing owl; suitable nesting habitat for the Cooper's hawk and White-tailed kite; and suitable roosting habitat for the Western yellow bat and Monarch butterfly. The proposed project may have the potential to impact nesting birds and raptors. In addition, no jurisdictional waters of the State or US have been formally delineated at the aquatic resources; thus, wetland impacts could occur if a wetland is delineated. Similar to the proposed project, each cumulative project would be reviewed on a case-by-case basis for its impact on biological resources and would be expected to comply with existing regulations and local and regional plans, ordinances, and policies protecting biological resources. Additionally, similar to the proposed project, each related project would be expected to implement mitigation measures, which would reduce each project's impact. Thus, the proposed project would not make a cumulatively considerable contribution to a potentially significant cumulative biological resources impact. Therefore, cumulative impacts associated with biological resources would be less than significant.

Significance without Mitigation: Less than significant.

3.4 CULTURAL RESOURCES

Cultural resources comprise archaeological and historical resources. Archaeology studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, buildings/structures, objects, or places that are at least 50 years old and are significant for their engineering, architecture, cultural use or association, etc. In California, historic resources cover human activities over the past 12,000 years. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the Fairview Developmental Center Specific Plan (proposed project) to impact cultural resources (historical and archaeological resources). Section 3.16, *Tribal Cultural Resources* discusses tribal cultural resources as well as tribal consultation. The analysis in this section is based, in part, upon the following source. Unless otherwise cited, information in this section comes from:

- *Archaeological and Built Environment Resources Inventory Report*, ECORP Consulting, Inc., January 2026 (Draft EIR Appendix D.1)

Terminology

Project Area: The project area consists of approximately 134 acres (see Figure 3.4-1, *Survey Coverage*). This is a conservative delineation used for the purposes of the cultural resources survey and analysis.

Area of Potential Effects: The area of potential effects (APE) encompasses the horizontal and vertical extent of the project site and includes all areas in which the proposed project may result in significant impacts or adverse effects to historical resources or historic properties. The APE is defined for projects subject to regulations implementing Section 106 of the National Historic Preservation Act. The APE totals approximately 172.11 acres.

Project Site: A 95-acre portion of the Fairview Developmental Center facility that encompasses the boundaries of the Fairview Developmental Center Specific Plan.

Notice of Preparation Comments

The City received a comment letter on the Notice of Preparation (NOP) from Costa Mesa First on December 5, 2025. The comment letter requests that the Draft EIR identify cultural and tribal cultural resources, analyze the proposed project's potential impact on the resource, and provide appropriate mitigation. The relevant cultural resource issues raised in this comment letter are addressed in this section. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*.

3.4.1 Regulatory Framework

FEDERAL

National Environmental Policy Act

NEPA establishes national policy for the protection and enhancement of the environment. Part of the function of the federal government in protecting the environment is to "preserve important historic, cultural, and natural aspects of our national heritage." Cultural resources need not be determined eligible for the National Register of Historic Places (NRHP) through the National Historic Preservation Act (NHPA) of 1966 (as amended) to receive consideration under NEPA. NEPA is implemented by regulations of the Council on Environmental Quality (40 Code of Federal Regulations [CFR] 1500-1508). The definition of effects in the NEPA regulations includes adverse and beneficial effects on historic and cultural resources (40 CFR 1508.1(i)). When determining the level of NEPA review, Federal agencies must analyze if potential effects to historic or cultural resources that could result from the proposed action and each alternative would be significant (40 CFR 1501.3(d)). In considering whether an alternative may "significantly affect the quality of the human environment," a federal agency must consider, among other things:

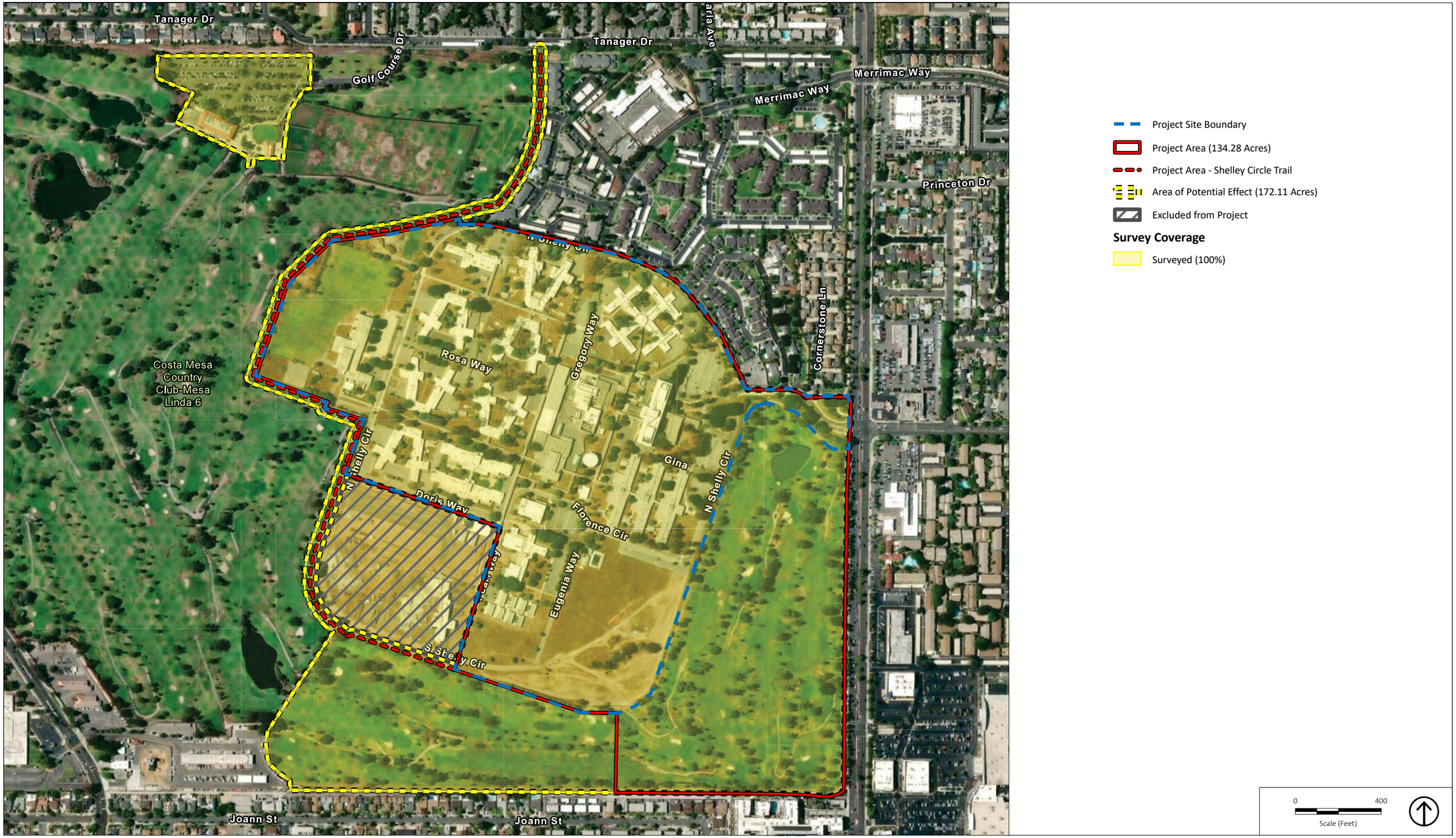
- Unique characteristics of the geographic area, such as proximity to historic or cultural resources (40 CFR1501.3(d)(1) and 40 CFR 1501.3(2)(ii)); and
- The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the NRHP (40 CFR1501.3(2)(v)).

Therefore, because historic properties are a subset of cultural resources, they are one aspect of the human environment defined by NEPA regulations.

National Historic Preservation Act (NHPA)

The federal law that covers cultural resources that could be affected by federal undertakings is the NHPA of 1966, as amended. Section 106 of the NHPA requires that federal agencies consider the effects of a federal undertaking on properties listed in or eligible for the NRHP. The agencies must give the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking. A federal undertaking is defined in 36 CFR 800.16(y):

> A federal undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license, or approval.



Source: ECORP Consulting 2026.

Figure 3.4-1
Survey Coverage

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The regulations that stipulate the procedures for complying with NHPA Section 106 are in 36 CFR 800. The NHPA Section 106 regulations require:

- definition of the APE;
- identification of cultural resources within the APE;
- evaluation of the identified resources within the APE using NRHP eligibility criteria;
- determination of whether the effects of the undertaking or project on eligible resources will be adverse;
- agreement on and implementation of efforts to resolve adverse effects, if necessary.

The federal agency must seek comment from the State Historic Preservation Officer (SHPO) and, in some cases, the Advisory Council on Historic Preservation, for its determinations of eligibility, effects, and proposed mitigation measures. NHPA Section 106 procedures for a specific project can be modified by negotiation of a Memorandum of Agreement or Programmatic Agreement between the federal agency, the SHPO, and, in some cases, the project proponent.

Effects to a cultural resource are potentially adverse if the lead federal agency, with the SHPO's concurrence, determines that the resource is eligible for the NRHP, making it a Historic Property, and if application of the Criteria of Adverse Effects (36 CFR 800.5[a][2] et seq.) results in the conclusion that the effects will be adverse. The NRHP eligibility criteria, contained in 36 CFR 60.4, are as follows:

> The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess aspects of integrity of location, design, setting, materials, workmanship, feeling, association, and:
>
> A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
>
> B. That are associated with the lives of persons significant in our past; or
>
> C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
>
> D. That have yielded, or may be likely to yield, information important in prehistory.

In addition, the resource must be at least 50 years old, barring exceptional circumstances (36 CFR 60.4). Resources that are eligible for or listed on the NRHP are Historic Properties.

Regulations implementing Section 106 of the NHPA (36 CFR 800.5) require that the federal agency, in consultation with the SHPO, apply the Criteria of Adverse Effect to Historic Properties within the APE. According to 36 CFR 800.5(a)(1), an adverse effect is defined as when an undertaking may:

> …alter, directly or indirectly, any of the characteristics of a Historic Property that qualify the property for inclusion in the [NRHP] in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

STATE

California Environmental Quality Act

CEQA is the state law that applies to a project's impacts on cultural resources. A project is an activity that may cause a direct or indirect physical change in the environment and that is undertaken or funded by a state or local agency, or that requires a permit, license, or lease from a state or local agency. CEQA requires that impacts to Historical Resources be identified and, if the impacts would be significant, then apply mitigation measures to reduce the impacts.

Per CEQA, a Historical Resource is a resource that:

1. Is listed in or is eligible for the California Register of Historical Resources (CRHR) by the State Historical Resources Commission, or has been determined historically significant by the CEQA lead agency because it meets the eligibility criteria for the CRHR;
2. Is included in a local register of historical resources, as defined in Public Resources Code (PRC) 5020.1(k); or
3. Has been identified as significant in a historical resources survey, as defined in PRC 5024.1(g) (California Code of Regulations [CCR] Title 14, Section 15064.5[a]).

The eligibility criteria for the CRHR are as follows (CCR Title 14, Section 4852[b]):

1. The resource is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. The resource is associated with the lives of persons important to local, California, or national history.
3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.

4. The resource has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the Nation.

In addition, the resource must retain integrity, which is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association (CCR Title 14, Section 4852(c)). Resources that have been determined eligible for the NRHP are automatically eligible for the CRHR.

Impacts to a Historical Resource, as defined by CEQA (listed in an official historic inventory or survey or eligible for the CRHR), are significant if the resource is demolished or destroyed, or if the characteristics that made the resource eligible are materially impaired (CCR Title 14, Section 15064.5(b)). Demolition or alteration of eligible buildings, structures, and features such that they would no longer be eligible would result in a significant impact. Whole or partial destruction of eligible archaeological sites would also result in a significant impact. In addition to impacts from construction resulting in destruction or physical alteration of an eligible resource, impacts to the integrity of setting (sometimes termed visual impacts) of physical features within a project area could also result in significant impacts.

LOCAL

City of Costa Mesa Local Register Designation Criteria

The Costa Mesa Municipal Code, Title 13, Chapter XI, Article 14, Historic Preservation, identifies and protects cultural resources that reflect the City's historical, architectural, and cultural development. Under Costa Mesa Municipal Code Section 13-200.9, Historic preservation procedures, resources generally 50 years of age or older may be designated if they meet National Register criteria or locally defined standards that consider historical associations, architectural merit, cultural importance, and integrity.

> The City Council, upon the recommendation of the Planning Commission (or other commission/committee designated by the City Council), may designate any building, structure, site, object, district, improvement, or natural feature that is over 50 years of age or, in special circumstances under 50 years, as a local landmark if it meets the criteria for listing in the National Register of Historic Places, or the criteria listed below. Any structure identified in the City's General Plan is recognized as being eligible for placement on the local Register. Designation criteria shall include the following:
>
> When the resource:
>
> A. Exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history; or
>
> B. Is identified with persons or events significant in local, state, or national history; or

C. Embodies distinctive characteristics of a style, type, period, or method of construction; or

D. Is a valuable example of the use of indigenous materials or craftsmanship; or

E. Represents the work of a notable builder, designer, or architect; or

F. Contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or

G. Has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community or of the city; or

H. Embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation; or

I. Is similar to other distinctive properties, sites, areas, or objects based on a historic, cultural, or architectural motif; or

J. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning; or

K. Is a type of building or is associated with a business or use which was once common but is now rare; or

L. Yields, or may yield, information important in prehistory or history; and retains the integrity of those characteristics necessary to convey its significance.

City of Costa Mesa General Plan

The Historical and Cultural Element of the City of Costa Mesa General Plan identifies policies about historical, archaeological, and cultural resources, and the following policies apply to the proposed project.

- **Policy HCR-1.4.** Require, as part of the environmental review procedure, an evaluation of the significance of paleontological, archaeological, and historical resources, and the impact of proposed development on those resources.

- **Policy HCR-1.7.** Require cultural resources studies (i.e., archaeological and historical investigations) for all applicable discretionary projects, in accordance with CEQA regulations. The studies should identify cultural resources (i.e., prehistorical sites, historical sites, and isolated artifacts and features) in the project area, determine their eligibility for inclusion in the California Register of Historical Resources, and provide mitigation measures for any resources in the project area that cannot be avoided. Cultural resources studies shall be

completed by a professional archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in prehistorical or historical archaeology.

- **Policy HCR-1.8.** Comply with requirements of the California Environmental Quality Act regarding protection and recovery of archaeological resources discovered during development activities.

3.4.2 Existing Conditions

REGIONAL PRE-CONTACT HISTORY

Paleo-Indian Period/Terminal Pleistocene (12,000 to 10,000 years before present [BP])

The first inhabitants of southern California were big-game hunters and gatherers exploiting extinct species of Pleistocene megafauna (e.g., mammoth and other Rancholabrean fauna). Local "fluted point" assemblages comprised of large spear points or knives are stylistically and technologically similar to the Clovis Paleo-Indian cultural tradition dated to this period elsewhere in North America. Archaeological evidence for this period in southern California is limited to a few small temporary camps with fluted points found around late Pleistocene lake margins in the Mojave Desert and around Tulare Lake in the southern San Joaquin Valley. Single points are reported from Ocotillo Wells and Cuyamaca Pass in eastern San Diego County and from the Yuha Desert in Imperial County.

Early Archaic Period/Early Holocene (10,000 to 8,500 BP)

Approximately 10,000 years ago, at the beginning of the Holocene, warming temperatures and the extinction of the megafauna resulted in changing subsistence strategies with an emphasis on hunting smaller game and increasing reliance on plant gathering. Previously, Early Holocene sites were represented by only a few sites and isolates from the Lake Mojave and San Dieguito complexes found along former lakebeds and grasslands of the Mojave Desert and in inland San Diego County. More recently, southern California Early Holocene sites have been found along the Santa Barbara Channel, in western Riverside County, and along the San Diego County coast.

Encinitas Tradition or Milling Stone Period/Middle Holocene (8,500 to 1,250 BP)

The Encinitas Tradition, formerly known as the Milling Stone Period, refers to a period of time during which small mobile bands of people who spoke an early Hokan language foraged for a wide variety of resources including hard seeds, berries, and roots/tubers (yucca in inland areas), rabbits and other small animals, and shellfish and fish in coastal areas. Sites from the Encinitas Tradition consist of residential bases and resource acquisition locations with no evidence for overnight habitation. Residential bases have hearths and fire-affected rock indicating overnight

habitation and food preparation. Residential bases along the coast have large amounts of shell and are often termed shell middens.

The Encinitas Tradition was initially relevant to non-desert regions of southern California and later segmented into the Topanga and Greven Knoll Patterns. The Topanga Pattern encompasses the Los Angeles Basin and Orange County, while the Greven Knoll Pattern covers southwestern San Bernardino County and western Riverside County. Each pattern consists of three temporal phases: Topanga I (8,500 to 5,000 years BP), Topanga II (5,000 to 3,500 BP), concluding around 3,500 BP with the arrival of Takic speakers, but continuing until about 2,000 BP in the Santa Monica Mountains.

Topanga I is characterized by abundant manos and metates, core tools, scarpers (see Appendix D.1). These artifacts gradually decrease in number through Topanga II and III. Projectile points decrease in size by Topanga II and mortars and pestles are adopted. By Topanga III, manos, metates, mortars, and pestles increase in abundance. A wider variety of small projectile points are found as well as stone-lined earthen ovens.

Palomar Tradition (1,250 to 150 BP)

The ancestors of the Gabrielino (Tongva) moved into the Los Angeles Basin from the southern San Joaquin valley about 3,500 BP, replacing the native Hokan speakers. Speakers of proto-Gabrielino reached the southern Channel Islands by 3,200 BP and moved as far south as Aliso Creek in Orange County by 3,000 BP.

The material culture of the inland areas where Takic languages were spoken at the time of Spanish contact is part of the Palomar Tradition (ECORP 2026). Two patterns are associated with the Palomar Tradition, the San Luis Rey and Peninsular. The San Luis Rey I Phase (1,000 to 500 BP) and San Luis Rey II Phase (500 to 150 BP) pertain to the area occupied by the Gabrielino at the time of Spanish contact. The Peninsular I (1,000 to 750 BP), II (750 to 300 BP), and III (300 to 150 BP) Phases are used in the areas occupied by the Cahuilla and Serrano, east of the project area.

San Luis Rey Phases I and II extended from the southern border of Orange County to the northern portion of San Diego County. The San Luis Rey Phase I is characterized by Cottonwood Triangular arrow points, use of bedrock mortars, stone pendants, shell beads, quartz crystals, and bone tools. San Luis Rey II is characterized by the addition of ceramics, including ceramic cremation urns, red pictographs on boulders in village sites, and steatite arrow straighteners. During San Luis Rey I there were a series of small permanent residential bases at water sources, each occupied by a kin group (probably a lineage). During San Luis Rey II people from several related residential bases moved into a large village located at the most reliable water source. Each village had a territory that included acorn harvesting camps at higher elevations. Villages contained numerous bedrock mortars, large dense midden areas with a full range of flaked and ground stone tools, rock art, and a cemetery.

ETHNOHISTORY

Ethnographic accounts of Native Americans indicate that the Gabrielino (also known as Gabrieleño, or Tongva) once occupied the region that encompasses the Project Area. At the time of contact with Europeans, the Gabrielino were the main occupants of the southern Channel Islands, the Los Angeles Basin, much of Orange County, and extended as far east as the western San Bernardino Valley. The term "Gabrielino" came from the group's association with Mission San Gabriel Arcángel, established in 1771.

The Gabrielino are believed to have been one of the most populous and wealthy Native American tribes in southern California prior to European contact, and spoke a Takic language. The Takic group of languages is a subgroup of the Uto-Aztecan language family.

The Gabrielino occupied villages located along rivers and at the mouths of canyons. Populations ranged from 50 to 200 inhabitants. Residential structures within the villages were domed, circular, and made from thatched tule or other available wood. Gabrielino society was organized by kinship groups, with each group composed of several related families who together owned hunting and gathering territories. Settlement patterns varied according to the availability of floral and faunal resources.

Vegetable staples consisted of acorns, chia, seeds, piñon nuts, sage, cacti, roots, and bulbs. Animals hunted included deer, antelope, coyote, rabbits, squirrels, rodents, birds, and snakes. The Gabrielino also fished and collected marine shellfish.

By the late 18th century, the Gabrielino population had significantly dwindled due to introduced European diseases and dietary deficiencies and communities disintegrated as families were taken to the missions. Recently, Gabrielino culture has undergone a resurgence, and current descendants are actively preserving their heritage.

COSTA MESA HISTORY

From 1848 to about 1880, the Santiago de Santa Ana grant was divided informally among the Yorba and Peralta heirs who continued to use the land for cattle ranching, vineyards, and other agricultural uses. Upon Teodocio Yorba's death in 1863, the ranch buildings and land at Old Santa Ana were conveyed to his daughter and son-in-law, Desiderio Burruel. The Santiago de Santa Ana grant was legally partitioned among the Yorba and Peralta descendants and other claimants in 1868. The land grant was divided into over 1,000 parcels of land. Many of the heirs sold their parcels, which resulted in much of the rancho passing out of the ownership of the Yorbas and Peralta families. The towns of Orange, Tustin, and Santa Ana were established on some of these parcels in the early 1870s.

South of Santa Ana most of the former rancho land remained agricultural through the first half of the twentieth century. The small communities of Fairview, Newport, and Thurin had

developed by 1900 to provide services for the rural households. Thurin was a stop on the Santa Ana & Newport Railroad, built by the McFadden Brothers in 1891 to connect their lumber business in Santa Ana with their Newport pier. The Santa Ana & Newport Railroad was purchased by the Southern Pacific Railroad in 1899.

The townsite of Harper was laid out along the railroad south of Thurin in 1910 (near what is now 19th Street and Newport Boulevard). It was named for a local farmer who had requested the siding at that location. Primarily a farming community, residents of Harper grew mainly sweet potatoes, corn, tomatoes, strawberries, and apples. By 1920, more businesses began to move to the community. In May of 1920, the community of Harper was officially renamed to Costa Mesa. Although development in Costa Mesa paused during the Great Depression, it increased again by the 1940s. During the years after World War II most of the agricultural land in Costa Mesa was developed for residential and commercial use.

Costa Mesa was incorporated as a City in 1953. It included the previously separate communities of Costa Mesa, Thurin, Fairview, and Newport. By the end of the twentieth century, the City had developed into a major commercial and industrial center of Orange County. In 1999, it adopted the slogan "The City of the Arts," as it is home to multiple theaters and concert halls.

FAIRVIEW DEVELOPMENTAL CENTER HISTORY

Public care for individuals with developmental disabilities in California began in the late nineteenth century with specialized vocational schools that prepared students for productive roles in society. After 1900, a therapeutic model of care began to supersede the educational model. Small, specialized schools such as the California Home for the Care and Training of Feeble-Minded Children in Sonoma County underwent expansions and became large state hospitals. The development of the Sonoma facility provided a model for the establishment of later institutions, including the FDC. In 1949, unsanitary conditions at many of the facilities prompted California lawmakers to authorize $110 million toward modernizing the state hospital system. The appropriation included funding for two new hospitals—one in Porterville and another in Costa Mesa—built exclusively for individuals with developmental disabilities.

Fairview State Hospital in Costa Mesa opened in 1959. Its largest buildings included the 280-bed Ward #1, and the 695-bed Receiving & Treatment and Administration Building with three adjoined Acute Infirm Wards. Architecturally, all of the buildings possessed International style features. The International style, a variation of the Modernist architectural movement, influenced the designs of almost all public buildings in the United States during the 1950s. The poured concrete buildings at Fairview State Hospital exhibited rectilinear forms with strong horizontal lines and metal frame windows and doors. A nearly mile-long plan of covered walkways connected the buildings and added to the facility's overall sense of linearity and order, all key characteristics of the International style. Fairview State Hospital achieved full buildout in 1964. Its 1,557 staff members that year provided care to 2,651 patients.

Fairview State Hospital marked a culmination of therapeutic philosophies, practices, and protocols for the care of individuals with developmental disabilities in California. Although it incorporated some vocational training, the hospital principally focused on self-sufficiency training with an aim toward returning patients to their families with enhanced self-care and socialization skills. At Fairview, "a medical model of treatment prevailed, the assumption being that mental retardation responded to treatment much like any other physical condition" (Appendix D.1).

Coincidentally, in 1959, the year Fairview State Hospital opened, the French geneticist Jérôme Jean Louis Marie Lejeune discovered that Down syndrome involved the occurrence of a third chromosome on the 21st pair. Prior to Lejeune's discovery, no causal explanation for Down syndrome existed. After 1959, medical professionals began to understand that Trisomy 21, the presence of a third #21 chromosome, caused many of the developmental disabilities treated at institutions such as Fairview State Hospital. Subsequently, the cultural understanding of developmental disabilities shifted, leading to deinstitutionalization and a preference for out-patient community care instead of long-term hospitalization. By 1985, Fairview State Hospital cared for only 1,100 patients, less than half its capacity.

COSTA MESA COUNTRY CLUB

Mesa Linda Golf Course

The Costa Mesa Country Club opened in November of 1967 and consists of two courses adjacent to the Fairview State Hospital in Costa Mesa. The western course is known as the Los Lagos Course, and the subject course in the project area to the east is known as the Mesa Linda Course.

In June of 1965, state assembly member Robert Badham (Newport Beach) introduced bills AB 3067 and AB 3257, which were intended to have Fairview State Hospital deed 250 acres to the City of Costa Mesa for development of a municipal golf course. The bills aimed to add a recreational facility to Costa Mesa that provided a buffer zone between the City and Fairview State Hospital. In exchange, the City of Costa Mesa would build a fire station on five acres in the southeast corner of the hospital land, giving the hospital additional fire protection. Backed by both the City and the hospital, the bill was signed by Governor Pat Brown in July of 1965, allowing the golf course project to move forward. Ground was broken on the course in April of 1966.

The Costa Mesa Country Club, consisting of both the Mesa Linda and Los Logos Courses, forms a horseshoe shape around the adjacent Fairview State Hospital. The country club is bounded by Tanager Drive to the north, Joann Street to the south, Placentia Avenue to the west, and Harbor Boulevard to the east.

Upon completion, the Mesa Linda Course measured 5,400 feet in length, with an 18-hole, par 70, 67-acre course, and was designed by Pasadena-based golf-course architect William F. Bell. When the course opened in June of 1967, it did not have a formal ribbon-cutting ceremony but an inaugural golf tournament was held. The first golfers to use the course were Pete Swan of Costa Mesa and Col. J. W. Fitts of Newport Beach. Holes ranged from 125 to 509 yards and included three lakes and a variety of sand traps. Besides the golf course, the facility also included a clubhouse, pro shop, driving range, and paved parking lot, all clustered at the north end of the property.

William F. Bell

William F. Bell, born in Pasadena, California, in 1918, was a prolific designer of golf courses on the west coast of the United States. He studied at the University of Southern California before joining his father, William P. Bell, in the family business of golf course design. The older Bell, a well-known architect, provided the basis for several popular golf courses in California. After William P. Bell died in 1953, William F. Bell took over the business and renamed it "William P. Bell and Son" to honor his father's legacy. Although his father laid the groundwork for the early construction of golf courses in California, William F. Bell built on that work and left his own imprint.

The younger Bell developed or redesigned more than 200 golf courses. His designs, which were recognized for their delicate integration of natural landscapes and deliberate use of topography, were mostly in California and the western United States. One of Bell's noteworthy accomplishments was the completion of the North and South Courses at Torrey Pines in La Jolla, California, which had been started by his father. The site was initially used as a military installation called Camp Callan but became a public golf course after World War II. The Torrey Pines courses represent some of the most well-known public golf courses in the U.S., holding significant events like the Professional Golfers' Association Tour's Farmers Insurance Open and other major championships.

In addition to Torrey Pines, Bell designed the Sandpiper Golf Club in Goleta, the Industry Hills Golf Club in the City of Industry, and the Bermuda Dunes Country Club in the Coachella Valley. His work is distinguished by utilitarian yet attractive designs that frequently maintain the natural beauty of the landscape. Bell aimed to create hard yet fun courses that blended into the landscape rather than overwhelmed it.

Bell's engagement with the American Society of Golf Course Architects (ASGCA) was noteworthy. He was elected to the ASGCA in 1950, served as president from 1957 to 1958, and was a member for 34 years until his death in 1984. Throughout his career, Bell was known for making subtle yet successful design decisions that fit in with the geography of the courses. Although his designs did not often have the dramatic flourishes of some predecessors, they were praised for their playability and use of natural curves.

Spanish Colonial Revival Architecture

The Costa Mesa Country Club clubhouse and pro shop exhibit minor elements of the Spanish Colonial Revival architecture that gained popularity during the Eclectic movement of the early twentieth century. The Eclectic movement began as a fashionable way for architects to design houses using influences from historic architectural styles. The trend first gained momentum in 1893 during the Chicago Columbian Exposition on architecture, which focused on historical styles. It acted as a new way for architects to simulate historical architecture in a modern way and eventually became wildly popular after the turn of the century with many eclectic styles emerging. Spanish Revival was one of these eclectic styles that came into popularity beginning in 1915 and lasting until the 1940s. The commercial building exhibits some elements of Spanish Revival architectural influences.

The Spanish Revival style was first introduced at the Panama-California Exposition held in San Diego in 1915. It was introduced as an elaborate portrayal of Spanish prototypes seen from other countries throughout the world. Spanish Revival architecture was particularly popular in California, and most popular in Southern California. The popularity of Spanish Revival architecture in Southern California was likely due to the popularity of Mission-style houses in Los Angeles and other areas. Mission-style houses appear similar in architectural detail and elaboration with the Spanish Revival style and set a good precedent for development in those areas. Some areas of Los Angeles have large neighborhoods of Spanish Revival homes. Spanish Revival style, as well as many Eclectic-period styles, fell out of popularity as a result of the Great Depression and the U.S. entrance into World War II, when supplies were less easily available and money was tight. After the Eclectic period, buildings were constructed with less architectural detail and more simple forms focusing on affordability and functionality.

Character-defining features of the Spanish Revival style of architecture include half-cylinder or S-curve tiled roofs, focal windows with large arches or decorative wood or iron grilles, stucco-clad and elaborate chimney tops, stucco or tile vents, arcaded (arched) walkways or winged walls, walled courtyards, casement windows with decorative wood framework, multi-level roofs, covered porches (usually on the façade), and sometimes fountains.

3.4.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact on cultural resources if it would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

METHODOLOGY

SCCIC Records Search

A records search for the project area was conducted at the South Central Coastal Information Center (SCCIC) of the CHRIS at California State University, Fullerton, on November 24, 2025. The purpose of the records search is to determine the extent of previous surveys within a one-mile (1600-meter) radius of the project area, in addition to whether previously documented pre-contact or historic archaeological sites, architectural resources, or traditional cultural properties exist within the project area.

Archival Records Review

In addition, a review of archaeological records and historical references pertinent to Orange County was conducted. Documents included the Built Environment Resource Directory (BERD), National Register Information System, California Historical Landmarks, various Caltrans surveys, and others. Historical maps were also examined dating from 1890 to 1981, including multiple editions of USGS Santa Ana and Newport Beach quadrangles. Historical aerial photographs from 1938 to 1992 were also analyzed to assess the project area usage and changes in the built environment. The Costa Mesa Register of Historic Places is situated about one mile south of the project area. Appendix D.1 lists all references and databases reviewed under the records search.

An archival records search focusing on the Costa Mesa Country Club property was conducted. On January 8, 2025, digitized building permit records were requested from the City of Costa Mesa Building Safety Division and received on January 13, 2025. The available permits were limited to interior renovations and cellular antenna installations; no original construction permits were provided. In addition, the digital collections of the Costa Mesa Public Library were reviewed, including historical articles, photographs, and documents relevant to the property, which were used to inform the historical context and significance evaluation. Historical newspapers from Costa Mesa and surrounding communities were also examined to better understand the City's development and the history of the Costa Mesa Country Club property. Finally, on November 15, 2025, data from the Orange County Assessor were reviewed to confirm construction dates and current ownership of the golf course.

Historical Society Correspondence

Letters were sent to the Orange County Historical Society and Costa Mesa Historical Society on December 9, 2025, seeking comments or historical information relevant to the project site. As

of this document's preparation, there has been no response from the Orange County Historical Society; the Costa Mesa Historical Society acknowledged receipt of the letter on December 10, 2025, but did not provide additional information.

Pedestrian Survey

An intensive pedestrian survey of the FDC on October 13, 2023, and Shelley Circle Trail and the Mesa Linda Golf Course on November 19, 2025, used 15-meter transects. Figure 3.4-1, *Survey Coverage*, shows the total area covered by the field study.

Area of Potential Effects

As shown in Figure 3.4-1, *Survey Coverage*, the area of potential effects (APE) consists of the horizontal and vertical limits of a project and includes the area within which significant impacts or adverse effects to Historical Resources or Historic Properties could occur as a result of the proposed project. The APE is defined for projects subject to regulations implementing Section 106 (federal law and regulations).

The horizontal APE consists of all areas where activities associated with a project are proposed. This includes areas proposed for construction, vegetation removal, grading, trenching, stockpiling, staging, paving, and other elements. The horizontal APE is illustrated in Figure 3.4-1.

The vertical APE is described as the maximum depth below the surface to which excavations for project foundations and facilities will extend. Therefore, the vertical APE includes all subsurface areas where archaeological deposits could be affected. The subsurface vertical APE varies across the project area but could extend as deep as 20 feet below the current surface; therefore, a review of geologic and soils maps was necessary to determine the potential for buried archaeological sites that cannot be seen on the surface. The vertical APE also is described as the maximum height of structures that could affect the physical integrity and integrity of setting of cultural resources, including districts and traditional cultural properties. For the proposed project, the above-surface vertical APE is assumed to be as high as 120 feet above the current surface.

3.4.4 Project Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

The records search and field survey yielded the identification of two historic-era resources, the Mesa Linda Golf Course and FDC, that may be impacted by the proposed project. Both resource are evaluated below.

MESA LINDA GOLF COURSE

The Mesa Linda Golf Course is a public golf course that abuts the project site to the northwest, south, southeast, and southwest.

NRHP and CRHR

The Mesa Linda Golf Course was evaluated as a historic landscape with buildings and landscape features for both the NRHP and the CRHR. The Mesa Linda Golf Course, completed in 1967, was part of the Costa Mesa Country Club and primarily intended for local recreation. However, it lacks individual significance under the NRHP and CRHR Criteria A/1 because it is not linked to notable historical events or broader historical patterns in Orange County. Under NRHP/CRHR Criteria B/2, the course does not exhibit ties to significant historical figures because archival research shows no associations with prominent individuals at local, state, or national levels. No significant golfers or owners are linked to the course's historical narrative, diminishing its relevance in this context. Regarding NRHP/CRHR Criteria C/3, although it was designed by renowned golf course architect William F. Bell, the Mesa Linda Golf Course does not display his signature design elements or artistic innovations that characterize his works. Despite featuring standard golf course components and integration with the environment, it remains a modest example and lacks the distinctive traits seen in Bell's other recognized designs. Finally, in the context of NRHP/CRHR Criteria D/4, the Mesa Linda Golf Course does not hold the potential to yield historically significant information because existing archival research is complete and well-established. Consequently, the course is deemed ineligible for listing under all four criteria assessed. A full evaluation of the Mesa Linda Golf Course to the NRHP and the CRHR requirements can be found in Appendix D.1 of the Draft EIR.

Integrity

The landscape characteristics of the Mesa Linda Golf Course comprise the individual features of the course. These features would need to remain for the golf course to retain integrity of its landscape and display spatial organization, circulation, topography, vegetation, buildings, structures, and water features. Each landscape characteristic was analyzed based on what was present historically and its current condition. Historic integrity is determined by the extent to which the general character of the historic period is evident and the degree to which incompatible elements that obscure that character can be reversed. The historic integrity and significance of each landscape characteristic and associated features in the context of the landscape was evaluated as a whole.

The Mesa Linda Golf Course has operated continuously since it first opened in 1967. The tees, fairways, roughs, and putting greens have experienced few alterations or reconfiguration since the course first opened. The clubhouse has maintained much of its original architectural integrity. Although a pro shop and snack bar were added to the course in the 1990s, this had no

effect on the course layout or overall feel of the facility. The course, therefore, retains location, setting, association, workmanship, feeling, materials, and design.

City of Costa Mesa Local Register Designation Criteria

Table 3.4-1, *City of Costa Mesa Local Register Designation Criteria – Mesa Linda Golf Course*, evaluates the Mesa Linda Golf Course against the designation criteria for the City of Costa Mesa's local register, which provides a comprehensive framework to evaluate properties based on their historical, cultural, and architectural significance. The analysis of the Mesa Linda Golf Course against these criteria indicates that it fails to meet any of the outlined standards.

Table 3.4-1 City of Costa Mesa Local Register Designation Criteria – Mesa Linda Golf Course

City of Costa Mesa Local Register Designation Criteria	Analysis
a) Exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history; or	The Mesa Linda Golf Course and associated buildings are typical examples of their type and not special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history.
b) Is identified with persons or events significant in local, state, or national history; or	The archival record does not show any names or events from the period of its construction that gained historical significance as a result of the Mesa Linda Golf Course.
c) Embodies distinctive characteristics of a style, type, period, or method of construction; or	The features of Mesa Linda are similar to other golf courses of the period, and it was a modest example of an 18-hole golf course. It does not have distinctive characteristics of a style, type, period, or method of construction.
d) Is a valuable example of the use of indigenous materials or craftsmanship; or	The golf course and associated buildings are not a valuable example of the use of indigenous materials or craftsmanship.
e) Represents the work of a notable builder, designer, or architect; or	Although it was designed by William F. Bell, it does not exhibit any of his artistic touches that helped his most famous courses gain notoriety or maintain relevance in the changing environments of golf. William F. Bell built many golf courses in California but did not gain notoriety from the design of the Mesa Linda Golf Course. His best works—Torrey Pines Golf Course, Bermuda Dunes Country Club, and Sandpiper Golf Club—are still well known and used today.

Table 3.4-1 City of Costa Mesa Local Register Designation Criteria – Mesa Linda Golf Course

City of Costa Mesa Local Register Designation Criteria	Analysis
f) Contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or	This typical public golf course does not contain a concentration of historic or scenic properties or thematically related grouping of properties that contribute to each other and are unified aesthetically by plan or physical development.
g) Has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community or of the city; or	The location of the course is flat; it does not have a unique location or singular physical characteristics, nor is it a view or vista representing an established and familiar visual feature of a neighborhood, community, or of the City.
h) Embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation; or	The Mesa Linda Golf Course, as a district that comprises buildings and a landscape, does not embody the distinctive characteristics of design or construction techniques of William F. Bell. It does not provide a good representation of his artistic embellishments or philosophy in golf course design.
i) Is similar to other distinctive properties, sites, areas, or objects based on a historic, cultural, or architectural motif; or	The Mesa Linda Golf Course and associated buildings do not share a connection to other distinctive properties, sites, areas, or objects based on a historic, cultural, or architectural motif.
j) Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning; or	The Mesa Linda Golf Course and associated buildings do not contain significant geographical patterns.
k) Is a type of building or is associated with a business or use which was once common but is now rare; or	The property operates as a golf course, which is a common use for the area.
l) Yields, or may yield, information important in prehistory or history; and retains the integrity of those characteristics necessary to convey its significance.	The Mesa Linda Golf Course does not have the potential to yield information important in prehistory or history. Archival research potential for the golf course has been exhausted, and the property's history is well documented in the archival record.

Source: ECORP 2026 (Appendix D.1).

The Harbor Boulevard/ Proposed Secondary Access-Harbor Center intersection would require construction of a roadway through the Mesa Linda Golf Course and reconfiguration of up to six golf holes to maintain course operations while meeting circulation and emergency access requirements, affecting approximately 45 acres. Although these off-site improvements would physically alter portions of the golf course, the Mesa Linda Golf Course has been determined not to qualify as a historical resource under applicable federal, state, or local criteria, as discussed above. Accordingly, implementation of the proposed project would not result in a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant.**

FAIRVIEW DEVELOPMENTAL CENTER

The FDC is considered eligible for listing in the NRHP and the CRHR under Criteria A/1 and C/3. The FDC includes 39 buildings and structures of historic age (constructed in 1974 or earlier), all of which were evaluated for individual and district eligibility under the NRHP and CRHR. The FDC and its individual resources were also evaluated for eligibility as a California Historical Landmark (Appendix D.1).

The Fairview State Hospital Historic District (Historic District) is historically significant as a cohesive and distinguishable entity whose components, while generally lacking individual distinction, collectively represent an important concentration of buildings, structures, objects, and landscape features unified by a common plan, purpose, and physical development. The period of significance extends from 1952, when construction began, to 1969, the onset of the deinstitutionalization era. The Historic District is significant at the local level for its role in the evolution of public institutional mental health care (NRHP/CRHR Criteria A/1) and at the state level as a representative example of a post–World War II state hospital campus (NRHP/CRHR Criteria C/3).

Of the 39 buildings and structures within the FDC, 36 contribute to the eligibility of the Historic District and are considered culturally sensitive resources. In addition, contributing landscape features and outdoor spaces are integral to the Historic District and are also considered culturally sensitive. However, neither the FDC as a whole nor any individual building or feature on its own meets the criteria for designation as a California Historical Landmark.

The proposed project would involve removal of buildings from the Fairview Developmental Center, resulting in an impact to historic properties under Section 106 of the National Historic Preservation Act and to historical resources under CEQA that would be **potentially significant.**

Significance without Mitigation: Potentially Significant.

Impact CUL-1: The proposed project would result in a substantial adverse change in the significance of a historical resource due to the removal of historic buildings within the Fairview Developmental Center.

Mitigation Measure CUL-1: Historic American Building Survey Recording. Prior to any ground-disturbing activities or alterations that may impact the Fairview Developmental Center complex, a Historic American Buildings Survey (HABS)-style documentation by a qualified architectural historian shall be required. The documentation shall include a historical narrative, physical description of the historic district, scaled district map, and high-resolution digital photographs. The final documentation shall be submitted to the City of Costa Mesa and a local archive or publicly accessible repository for archival purposes. The final documentation shall be approved by the City prior to demolition of the Fairview Developmental Center, including both the buildings and the walking paths.

Mitigation Measure CUL-2: Historic Interpretive Panels. Following construction of the planned trail on the east side of the Project Area, the Master Developer and/or applicants shall install two interpretive panels along the trail. The panels should contain material documenting the history of the FDC, its place in the broader history of the City of Costa Mesa, and the place of state developmental centers in the general history of the State of California and its people. The two panels should address different topics relevant to the above themes and should include both pictures and explanatory text. The two panels shall be developed in consultation with the City and a qualified architectural historian.

Mitigation Measure CUL-3: Contractor Awareness Training. The City of Costa Mesa shall ensure that a Contractor Awareness Training Program is delivered to train equipment operators about cultural resources. The program shall be designed to inform construction personnel about: federal and state regulations pertaining to cultural resources and tribal cultural resources; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the City of Costa Mesa of any occurrences; project-specific requirements and mitigation measures; and enforcement of penalties and repercussions for non-compliance with the program. The training shall be prepared by a qualified professional archaeologist and may be provided either through a brochure, video, or in-person tailgate meeting, as determined appropriate by the archaeologist.

The training shall be provided to all construction supervisors, forepersons, and operators of ground disturbing equipment. All personnel shall be required to sign a training roster. The construction manager is responsible for ensuring that all required personnel receive the training. The Construction Manager shall provide a copy of the signed training roster to the City of Costa Mesa as proof of compliance.

Significance with Mitigation: Significant and unavoidable. The FDC is considered eligible for listing as a historic resource on both a state and local level as a Historic District. Both the structures and landscape features and outdoor spaces are also considered culturally sensitive and contribute to their eligibility. Although Mitigation Measures CUL-1, -2 and -3 would partially reduce impacts to the Historic District through documentation of the FDC in accordance with Historic American Buildings Survey (HABS) standards, demolition of the campus, including buildings and landscape features/outdoor spaces, generally cannot be mitigated to a less-than-significant level. Therefore, the impact would remain significant and unavoidable.

Mitigation Measures Considered and Rejected

An additional preservation in place mitigation measure was considered for the potential to reduce potentially significant impacts to the Historic District, but was rejected because it was determined to be infeasible. In order to fully offset impacts to the cultural resources, the FDC campus would need to be preserved in place, including landscape and outdoor features since the structures and outdoor features both contribute to the Historic District. However, a preservation in place mitigation would face feasibility constraints due to the presence of hazardous materials associated with prior site uses, and therefore, retaining and adaptively reusing all existing buildings may not be physically practicable due to safety and remediation constraints. In addition, the existing buildings at the project site were originally designed for institutional purposes related to the former FDC and are low density and not suited for modern residential development. As a result, this mitigation measure is considered and rejected.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Based on soils alone, the Project Area has a low potential for buried pre-contact archaeological sites. The proposed project is located 0.5 miles east of a low bluff area at Fairview Park and is above the Santa Ana River. Due to this close proximity to these natural features, the Project Area would suggest a high potential for buried pre-contact archaeological sites. Geologically, the top of the bluff are Older Quaternary deposits, while the river channel deposits are more recent Quaternary alluviums. Due to the difference in elevation, the alluvial soils in the Project Area are not from the river, but rather from small local drainages.

The Project Area is located on a low bluff near the mouth of the Santa Ana River. A series of extensive precontact resources exist approximately 0.5 miles west of the project area, on top of the bluff, directly, between the FDC and the Santa Ana River. Due to the presence of the Project Area on older deposits along the top of the bluff, combined with the presence of recorded pre-contact resources in the area between the Project Area and the river, the Project Area has moderate potential for buried pre-contact archaeological sites.

However, there is a low potential for buried historic-era resources to be located within the project area. No buildings or structures were located in the project area prior to the 1920s. After the 1920s, cities and counties had sewer and trash systems to remove and dispose of debris, reducing the need to bury it nearby.

Because there is a low to moderate potential to encounter pre-contact resources during construction, this impact would be **potentially significant.**

Significance without Mitigation: Potentially Significant.

Impact CUL-2: The proposed project has a moderate to low potential in uncovering pre-contact resources during construction.

Mitigation Measure CUL-4: Archaeological Monitoring. Prior to the start of construction, the Master Developer and/or applicants for new development projects shall retain a qualified professional archaeologist to monitor all ground-disturbing activities associated with project construction.

The Monitoring Archaeologist shall meet or work under the direct supervision of someone meeting the Secretary of the Interior's professional qualifications standards for prehistoric and historic archaeology. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 100 feet of any discovery of potential historical or archaeological resources in order to implement mitigation measures to address unanticipated discoveries.

Mitigation Measure CUL-5: Post-review/Unanticipated Discoveries. If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.

- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under California Environmental Quality Act (CEQA), as defined by CEQA or a historic property under Section 106 National Historic Preservation Act (NHPA), if

applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.

- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance. The archaeologist shall notify the Orange County Coroner. The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California Public Resource Code, and Assembly Bill 2641 will be implemented.
- If the coroner determines the remains are Native American and not the result of a crime scene, implement Mitigation Measure TCR-3.

Significance with Mitigation: Less than significant. Mitigation Measures CUL-3, -4 and -5 provides training and stop-work procedures to ensure any discoveries are properly identified and treated under CEQA Guidelines Section 15064.5. With these mitigation measures, potential impacts to archaeological resources would be less than significant.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

The project site has been developed and occupied by FDC facilities since 1952 and has been subject to prior disturbance. In addition, the off-site improvement area associated with the proposed secondary access road has been previously disturbed through the Costa Mesa Country Club operations. As a result, the presence of human remains is considered unlikely. However, ground-disturbing activities associated with the proposed project could potentially expose previously unrecorded cultural resources, including unknown buried human remains. In accordance with CEQA and Section 106 of the National Historic Preservation Act, the City of Costa Mesa would be required to address any unanticipated discoveries during construction. Therefore, this impact would be **potentially significant.**

Significance without Mitigation: Potentially Significant.

Impact CUL-3: The proposed project has the potential in uncovering cultural resources during construction.

Mitigation Measure CUL-5: Implement Mitigation Measures CUL-4 and CUL-5.

Significance with Mitigation: Less than significant. Although ground disturbance could expose unknown cultural resources, Mitigation Measure CUL-5 ensures work stoppage, professional

evaluation, and required state and federal procedures for treatment or protection. These measures reduce potential impacts to a less-than-significant level.

3.4.5 Cumulative Impact Analysis

The cumulative setting for cultural resources includes the City of Costa Mesa where ongoing and future urban development may result in ground disturbance. Such activities collectively increase the potential to damage or destroy unknown historic resources, archaeological resources, and/or human remains.

Would the project have a cumulative effect related to cultural resources?

HISTORIC RESOURCES

MESA LINDA GOLF COURSE

The Mesa Linda Golf Course, completed in 1967, is a public golf course evaluated for its historic significance under the NRHP and CRHR but deemed ineligible as it lacks ties to significant historical events or figures, and does not showcase distinctive design elements by architect William F. Bell. The course retains much of its original integrity with minimal alterations from opening but fails to meet Costa Mesa's local register designation criteria for historical, cultural, or architectural significance. The proposed project would only impact the southeastern portion of the Mesa Linda Golf Course where a secondary access road would be located for the proposed project. Therefore, the proposed project would not result in a cumulative effect on the Mesa Linda Golf Course as a cultural resource. Impact is **less than significant.**

Significance without Mitigation: Less than significant.

FAIRVIEW DEVELOPMENTAL CENTER

The proposed project would affect historic built resources associated with the FDC through the removal of contributing buildings within the Historic District. As identified under Threshold a), Mitigation Measures CUL-1, -2 and -3 would partially address these impacts through documentation of the FDC in accordance with Historic American Buildings Survey (HABS) standards and cultural resources training for project operators; however, demolition of the Historic District would still occur, resulting in the permanent loss of a historic resource.

In the context of cumulative impacts, the FDC has been decommissioned since 2025 and is surrounded by existing recreational and urban development. Due to the presence of hazardous materials on the site (see Section 3.8, *Hazards and Hazardous Materials*), the FDC can no longer be used for its original institutional purpose without remediation. Even under a preservation scenario, rehabilitation and hazardous materials abatement would be required to maintain the

Historic District. In addition, the FDC site is part of the City's 6th Housing Element inventory and is a State-owned property governed by specific legislation regarding its disposition and planning (California Government Code Section 14670.31). Given these constraints, and considering the broader pattern of surrounding development, the proposed project would not substantially contribute to a cumulatively considerable impact on historic resources. Impact is **less than significant.**

Significance with Mitigation: Less than significant.

ARCHAEOLOGICAL AND HUMAN REMAINS

Although the region is generally disturbed by urban development, future development would still involve a degree of earthwork and would therefore contribute to a regionwide cumulative risk of cultural resource loss. Similar to the proposed project, other development projects would involve grading, excavation, utility trenching, and other earthwork that could inadvertently uncover previously unknown archaeological resources or human remains. Future development projects would be required to comply with applicable regulatory requirements. Under existing applicable law, site-specific cultural resources investigations are required for other discretionary development projects before permitting ground disturbances or demolition or substantial alteration of existing structures can occur. Such investigations would include some degree of surface-level surveying and identify resources on the affected project sites that are or appear to be eligible for listing on the national or state registers for historic resources. Such investigations would also be required to mitigate impacts (where needed) to reduce impacts and protect and preserve any identified cultural and/or historic resources.

As discussed above, the proposed project incorporates Mitigation Measures CUL-4 and CUL-5 to ensure that any unanticipated finds are properly identified, evaluated, and protected in compliance with CEQA Guidelines Section 15064.5, the NHPA, and state laws governing human remains. With these measures in place, the proposed project's incremental contribution to cumulative cultural-resource impacts would be less than significant, and the proposed project's impacts would not be cumulatively considerable. Impact is **less than significant.**

Significance with Mitigation: Less than significant.

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3.5 ENERGY

This section of the DEIR evaluates the energy implications associated with the implementation of the proposed Fairview Developmental Center Specific Plan (FDCSP or proposed project) in a local and regional context. Energy service providers to the project area include Southern California Edison (SCE) for electrical service and Southern California Gas Company (SoCalGas) for natural gas. Energy consumption was estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1, and model outputs are in Appendix B.1 of this DEIR. In addition, this section quantitatively analyzes transportation energy by evaluating daily vehicle miles traveled (VMT) provided by Fehr and Peers (see Appendix J.2) and modeled using California Air Resources Board (CARB) EMFAC2025 (EMission FACtor model) v.2.1.0.

Notice of Preparation Comments

The City received one comment letter for the Notice of Preparation (NOP) regarding potential energy impacts. A letter from Costa Mesa First on December 5, 2025, requests documented adherence to applicable green building standards.

TERMINOLOGY

The following are definitions for terms used throughout this section.

- **BTU:** British thermal unit. A standard unit of measurement that is used to represent the energy content of heating fuels (e.g., natural gas, propane) and is equal to the amount of heat needed to raise the temperature of one pound of water by one degree Fahrenheit.
- **CALGreen:** California Green Building Code (California Code of Regulations [CCR], Title 24, Part 11). Encompasses Part 11 of the California Building Standards Code and stipulates water, waste, and design efficiencies as well as electric vehicle charging standards.
- **CEC:** California Energy Commission. A State agency within the California Natural Resources Agency that sets energy policy and building energy efficiency standards, develops the State's energy growth demand projections, engages in long-term power generation resource planning, and approves power plant siting.
- **CPUC:** California Public Utilities Commission. An independent State regulatory commission that oversees investor-owned utilities (e.g., electric, gas, water, telecommunications) by setting rates and procurement requirements in alignment with CEC energy policy and California Independent System Operator grid operations.
- **CBSC:** California Building Standards Code. Includes all individual parts of CCR Title 24.
- **Energy Code:** California Building Energy Efficiency Standards (24 CCR Part 6). Encompasses Part 6 of the CBSC, which stipulates energy-efficiency standards for new projects.

- **kWh:** Kilowatt-hour. A standard unit of measurement that is used to represent the amount of electricity consumed or supplied and is equivalent to approximately 3,412 British thermal units (BTU).
- **MWh:** megawatt-hour. One MWh is equal to 1,000 kWh.
- **GWh:** gigawatt-hour. One GWh is equal to 1,000 MWh or 1,000,000 kWh.
- **VMT:** Vehicle miles traveled.

3.5.1 Regulatory Framework

FEDERAL

Federal, state, and local laws, regulations, plans, or guidelines related to energy that are potentially applicable to the proposed project are summarized herein.

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of U.S. crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE Standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions.

The federal government issued new CAFE standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon (mpg) in 2025. On March 30, 2020, the US Environmental Protection Agency (EPA) finalized updated CAFE and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026 (EPA and NHTSA 2020).

On June 7, 2024, National Highway Traffic Safety Administration (NHTSA) announced final CAFE standards for passenger cars and light trucks built in model years 2027 to 2031 and final fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030 to 2035. The final rules establish standards that would require an industry fleetwide average of approximately 50.4 mpg for passenger cars and light trucks in model year 2031, by increasing fuel economy by 2 percent year over year for passenger cars (model years 2027–2031) and for light trucks (model years 2029–2031). For heavy-duty pickup trucks and vans, the final rule would increase fuel efficiency at a rate of 10 percent per year (model years 2030–2032) and 8 percent per year (model years 2033–2035) (NHTSA 2024).

Multi-pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles

In 2024, the EPA issued a final rule, "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles," that sets new, more protective standards to reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year (MY) 2027 (EPA 2026a).

2025 Rollback of CAFE and Federal Fuel Standards

While both the new CAFE standards and fuel standard are currently in effect, the Trump Administration directed the Department of Transportation to rescind and replace all existing CAFE standards and emissions standards on January 29, 2025. This action targeted regulations covering MY 2024 through 2035 for both light-duty and heavy-duty vehicles.

On June 6, 2025, the NHTSA published an interpretive rule that establishes the NHTSA's authority to revise the CAFE standards without consideration of electric vehicles (EV). California currently has no authority to implement these standards.

On June 11, 2025, the NHTSA published the final rule, "Resetting the Corporate Average Fuel Economy Program." This rule does not immediately change current fuel economy standards; however, the rule clarifies the NHTSA's interpretation of its obligations for CAFE standards stemming from the Energy Policy and Conservation Act of 1975 and the Energy Independence and Security Act of 2007. The rule asserts that some regulations, such as those established under previous presidential administrations, improperly considered EVs when identifying the "maximum feasibility" average fuel economy level on which CAFE standards are developed, thereby establishing a legal foundation for future rollbacks of CAFE standards (NHTSA 2025).

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The act sets increased corporate average fuel economy standards; the renewable fuel standard; appliance energy-efficiency standards; building energy-efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (EPA 2026b).

Energy Policy Act of 2005

Passed by Congress in July 2005, the Energy Policy Act includes a comprehensive set of provisions to address energy issues. This Act includes tax incentives for energy conservation improvements in commercial and residential buildings, fossil fuel production and clean coal facilities, and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers.

National Energy Policy

Established in 2001 by the National Energy Policy Development Group, the National Energy Policy is designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for the future. Key issues addressed by the energy policy are energy conservation, repair and expansion of energy infrastructure, and ways of increasing energy supplies while protecting the environment.

Natural Gas Pipeline Safety Act of 1968

The Natural Gas Pipeline Safety Act of 1968 authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. The Pipeline and Hazardous Materials Safety Administration within the Department of Transportation develops and enforces regulations for the safe, reliable, and environmentally sound operation of the nation's 2.6-million-mile pipeline transportation system.

STATE

Warren-Alquist Act

Established in 1974, the Warren-Alquist Act created the California Energy Commission (CEC) in response to the energy crisis of the early 1970s and the state’s unsustainable growing demand for energy resources. The CEC’s core responsibilities include advancing State energy policy, encouraging energy efficiency, certifying thermal power plants, investing in energy innovation, developing renewable energy, transforming transportation, and preparing for energy emergencies. The Warren-Alquist Act is updated periodically through legislative bills to address current energy needs and issues. The Warren-Alquist Act is updated annually to address current energy needs and issues, and its latest edition was in January 2023.

California Public Utilities Commission

In September 2008, the California Public Utilities Commission (CPUC) adopted the Long-Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California

through the year 2020 and beyond. It articulates a long-term vision and goals for each economic sector, identifying specific near-term, midterm, and long-term strategies to assist in achieving these goals. This plan sets the following four goals, known as Big Bold Energy Efficiency Strategies, to achieve significant reductions in energy demand:

- All new residential construction in California will be zero net energy by 2020.[1]
- All new commercial construction in California will be zero net energy by 2030.
- Heating, ventilation and air conditioning, commonly referred to as "HVAC," will be transformed to ensure that its energy performance is optimal for California's climate.
- All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

With respect to the commercial sector, the Long-Term Energy Efficiency Strategic Plan notes that commercial buildings, which include schools, hospitals, and public buildings, consume more electricity than any other end-use sector in California. The commercial sector's five-billion-plus square feet of space accounts for 38 percent of the state's power use and over 25 percent of natural gas consumption. Lighting, cooling, refrigeration, and ventilation account for 75 percent of all commercial electric use, and space heating, water heating, and cooking account for over 90 percent of gas use. In 2006, schools and colleges were in the top five facility types for electricity and gas consumption, accounting for approximately 10 percent of State's electricity and gas use (CPUC 2011).

The CPUC and CEC have adopted the following goals to achieve zero net energy levels by 2030 in the commercial sector:

- **Goal 1:** New construction will increasingly embrace zero net energy performance (including clean, distributed generation), reaching 100 percent penetration of new starts in 2030.
- **Goal 2:** 50 percent of existing buildings will be retrofit to zero net energy by 2030 through achievement of deep levels of energy efficiency and with the addition of clean distributed generation.
- **Goal 3:** Transform the commercial lighting market through technological advancement and innovative utility initiatives.

California Energy Commission California Energy Demand Forecast

The CEC assesses and forecasts the state's energy systems and trends. This includes forecasts for electricity consumption, retail sales, and peak demand for each of the five major electricity

[1] Zero net energy buildings are buildings where the total amount of energy used by the building on an annual basis is equal to or less than the amount of renewable energy created on the site.

planning areas and the whole state. The CEC Forecast includes three demand scenarios (low, mid, and high) to capture a reasonable range of demand outcomes over the next 14 years.[2]

- **Low-Demand.** The low-demand energy scenario includes lower economic or demographic growth and assumes higher rates and higher self-generation impacts.
- **Mid-Demand.** The mid-demand energy scenario uses input assumptions at levels between low and high scenarios. These scenarios are referred to as the *baseline cases*, meaning they do not include the additional achievable energy efficiency savings.
- **High-Demand.** The high-demand energy scenario incorporates relatively high economic or demographic growth and climate change impacts as well as relatively low electricity rates and self-generation impacts.

Renewable Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill (SB) 1078 and was amended in 2006, 2011, and 2018. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Initially under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent and to reach at least 20 percent by December 30, 2010. Executive Order (EO) S 14 08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the California legislature in 2011 (SB X1-2). The CPUC is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the state. For year 2020, the three largest retail energy utilities each provided an average of 43 percent of its supplies from renewable energy sources. Community choice aggregators provided an average of 41 percent of their supplies from renewable sources (CPUC 2021).

Clean Energy and Pollution Reduction Act

The Clean Energy and Pollution Reduction Act, commonly known by its legislative bill number SB 350, was enacted on October 7, 2015, and expands the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, this Act includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses upon which an energy efficiency program is focused) of retail customers through energy conservation

[2] The latest low-demand scenario forecast as of this analysis is from CEC's 2021-2035 forecast while baseline scenarios have been updated annually.

and efficiency. This Act also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. This Act also provides for the transformation of the California Independent System Operator (CAISO) into a regional organization to promote the development of regional electricity transmission markets in the western states and to improve the access of consumers served by CAISO to those markets, pursuant to a specified process.

Senate Bill 100

On September 10, 2018, SB 100 was signed into law to replace the Clean Energy and Pollution Reduction Act (SB 350) requirements. Under SB 100, the RPS for public owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill also establishes an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under SB 100, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The Clean Energy, Jobs, and Affordability Act of 2022

The Clean Energy, Jobs, and Affordability Act of 2022, commonly known as its legislative bill number SB 1020, was signed into law on September 16, 2022. This Act requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, this Act requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.

AB 117 and SB 790

Community Choice Aggregation is a program that allows cities, counties, and other qualifying governmental entities within the service areas of investor-owned utilities to purchase and/or generate electricity for their residents and businesses. This program was made possible in California by passage of Assembly Bill (AB) 117 (Migden, 2002) and SB 790 (Leno, 2011). AB 117 established Community Choice, and SB 790 strengthened it by creating a “code of conduct” that the incumbent utilities must adhere to in their activities relative to Community Choice.

Energy Efficiency Regulations

California Energy Code

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC)

in June 1977 (California Code of Regulations [CCR], Title 24, Part 6, California Energy Code). The California Energy Code (Building Energy Efficiency Standards) requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

The 2025 Building Energy Efficiency Standards, adopted in 2024 and effective January 1, 2026, build upon the 2022 standards by further advancing energy efficiency and building decarbonization (CEC 2022a, 2025). The 2025 update expands the use of high-efficiency electric heat pumps for space and water heating, strengthens electric-ready requirements to support future electrification, and enhances building envelope and ventilation standards to improve energy performance and indoor air quality. The standards also update and expand solar photovoltaic and battery storage requirements for certain residential and nonresidential building types and improve system controls to support grid reliability and demand flexibility. Overall, the 2025 standards are intended to further reduce energy consumption and to continue supporting California's long-term climate and energy goals.

California Green Building Standards Code

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (CCR Title 24, Part 11, known as "CALGreen") includes mandatory requirements for new residential and nonresidential buildings throughout California. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The mandatory provisions of CALGreen became effective January 1, 2011, and were most recently updated in 2024 (2025 CALGreen update). The 2025 CALGreen update became effective on January 1, 2026, and updates residential and non-residential voluntary measures.

Overall, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impacts during and after construction. CALGreen contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.

2008 California Energy Action Plan Update

The 2008 Energy Action Plan Update provides a status update to the 2005 Energy Action Plan II, which is the state of California's principal energy planning and policy document. The Update continues the original Energy Action Plan (adopted in 2003), which describes a coordinated implementation plan for state energy policies, and identifies specific action areas to ensure that California's energy is adequate, affordable, technologically advanced, and environmentally sound. First-priority actions to address California's increasing energy demands are energy efficiency, demand response (i.e., reduction of customer energy usage during peak periods in order to address system reliability and support the best use of energy infrastructure), and the use of renewable sources of power. If these actions are unable to satisfy the increasing energy and capacity needs, the plan supports clean and efficient fossil-fired generation.

Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the CEC and contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods.

Transportation-Sector-Specific Regulations

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduced GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles.

In January 2012, the CARB approved the Pavley Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025 (CARB 2026). The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

Executive Order (EO) N-79-20

On September 23, 2020, EO N-79-20 was issued, which sets a time frame for the transition to zero-emissions (ZE) passenger vehicles and trucks in addition to off-road equipment. It directs CARB to develop and propose the following:

- Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs (zero-emission vehicles) sold in the California toward the target of 100 percent of in-state sales by 2035.
- Medium- and heavy-duty vehicle regulations requiring increasing volumes of new ZE trucks and buses sold and operated in California toward the target of 100 percent of the fleet transitioning to ZEVs by 2045 everywhere feasible, and for all drayage trucks to be ZE by 2035.
- Strategies to achieve 100 percent zero emissions from all off-road vehicles and equipment operations in California by 2035, in cooperation with other State agencies, the EPA, and local air districts.

On August 25, 2022, CARB adopted the Advanced Clean Cars II (ACC II) regulations that codify the EO goal of 100 percent of in-state sales of new passenger vehicles and trucks be ZE by 2035. Starting in year 2026, Advanced Clean Cars II requires that 35 percent of new vehicles sold be ZE or plug-in hybrids. In December 2024, the EPA granted California a Clean Air Act waiver allowing implementation and enforcement of the ACC II standards, affirming federal support for the state's authority to adopt these advanced vehicle emissions regulations.

In 2025, Congress used the Congressional Review Act (CRA) to pass joint resolutions disapproving the EPA's waiver for ACC II and related California vehicle emissions standards, and President Trump signed these into law. This action effectively blocks the federal waiver that underpins California's ability to enforce its ACC II zero-emission vehicle mandate (Holland & Knight 2025). California has filed a lawsuit challenging this use of the CRA on the grounds that Clean Air Act waivers historically have not been subject to CRA disapproval and that the CRA does not legally apply to these waivers.

Advanced Clean Fleets Regulation

In April 2023, CARB released the Advanced Clean Fleets (ACF) regulation to accelerate the transition to zero-emission medium- and heavy-duty vehicles (CARB 2023). In conjunction with the Advanced Clean Trucks regulation, the ACF regulations helps to ensure that medium- and heavy-duty ZEVs are brought to the market by requiring certain fleets to purchase them. The ACF ZEV phase-in approach sets clear targets for regulated fleets to make a full conversion to ZEVs.

The ACF regulations cover four main elements:

- **Manufacturer sales mandate.** Manufacturers may sell only zero-emission medium- and heavy-duty vehicles starting in 2036.
- **Drayage fleets.** Beginning January 1, 2024, trucks must be registered in the CARB Online System to conduct drayage activities in California. Non-zero-emission "legacy" drayage trucks could register in the CARB Online System through December 31, 2023. Legacy drayage trucks can continue to operate through their minimum useful life. Beginning January 1, 2024, only zero-emission drayage trucks may register in the CARB Online System. All drayage trucks entering seaports and intermodal railyards would be required to be zero-emission by 2035.
- **High priority and federal fleets.** High priority and federal fleets must comply with the Model Year Schedule or may elect to use the optional ZEV Milestones Option to phase-in ZEVs into their fleets:
  - **Model Year Schedule.** Fleets must purchase only ZEVs beginning 2024 and, starting January 1, 2025, must remove internal combustion engine vehicles at the end of their useful life as specified in the regulation.
  - **ZEV Milestones Option (Optional).** Instead of the Model Year Schedule, fleets may elect to meet ZEV targets as a percentage of the total fleet starting with vehicle types that are most suitable for electrification.
- **State and local agencies.** State and local government fleets, including city, county, special district, and State agency fleets, would be required to ensure 50 percent of vehicle purchases are zero-emission beginning in 2024 and 100 percent of vehicle purchases are zero-emission by 2027. Small government fleets (those with 10 or fewer vehicles) and those in designated counties would start their ZEV purchases beginning in 2027. Alternately, State and local government fleet owners may elect to meet ZEV targets using the ZEV Milestones Option. State and local government fleets may purchase either ZEVs or near-ZEVs or a combination of ZEVs and near-ZEVs until 2035. Starting in 2035, only ZEVs will meet the requirements.

The ACF regulations also establish requirements that transform the medium- and heavy-duty vehicle sector and demonstrate independent utility through achievement of the following objectives:

- Achieve criteria and GHG emissions reductions consistent with the goals identified in the State Implementation Plan (SIP) Strategy and Scoping Plan.
- Provide emissions reductions in disadvantaged communities (DAC), thereby supporting the implementation of Assembly Bill (AB) 617 (Garcia, C., Chapter 136, Statutes of 2017).
- Support the goals of Executive Order N-79-20, which calls for accelerated ZEV deployment with these targets:
  - 100 percent ZE drayage by 2035.

- 100 percent ZE trucks and buses where feasible by 2045.
- Ensure requirements, such as ZEV deployment schedules and related infrastructure buildout, are technologically feasible, cost-effective, and support market conditions.
- Lead the transition away from petroleum fuels and toward electric drivetrains.
- Contribute towards achieving carbon neutrality in California pursuant to SB 100 and in accordance with EO B-55-18.
- Mindfully set requirements to allow time for public ZE infrastructure buildout for smaller fleets or for regional haul applications who would be reliant on a regional network of public chargers.
- Ensure manufacturers and fleets work together to place ZEVs in service suitably and successfully as market expands.
- Establish a fair and level playing field among fleet owners.
- Craft the proposed project in a way that ensures institutional capacity for CARB to manage, implement, and enforce requirements.

In January 2025, CARB withdrew its request to the EPA for a preemption waiver required for those federal-applicable portions of the ACF regulation, and as a result CARB announced it would not enforce the high-priority and drayage fleet requirements that would have required a waiver. Elements of the rule that did not require a waiver remain in effect, but the withdrawal of the waiver request, combined with legal and regulatory challenges, has limited the federal enforceability of the ACF's zero-emission fleet mandates (Holland & Knight 2025).

Energy Storage

California has set ambitious long-term goals for energy storage beyond 2026 to support its clean energy and climate goals. The state aims to reach 100 percent carbon-free electricity by 2045, which will require significant investment in renewable energy sources like wind and solar, as well as energy storage technologies to balance the variability of these sources.

The CAISO has a total energy storage capacity of more than 3,160 megawatts (MW) as of June 2022 (CAISO 2022). This includes both large-scale and distributed energy storage systems (ESS), such as batteries, pumped hydroelectric storage, and thermal storage. CAISO is responsible for managing the electricity grid for much of California, and it has set a target of adding 3,300 MW of additional energy storage capacity by 2024 to support the integration of more renewable energy sources like wind and solar. As part of SB 100, load serving entities (LSE) were required to procure no less than 1.3 gigawatts (GW) of energy storage capacity by 2020, and 3 GW by 2030. Additionally, the CPUC has established a target of 15 GW of energy storage capacity by 2030 (CPUC 2022).

The Integrated Resource Plan

CAISO develops a coordinated grid management plan to integrate the generation and storage capacities of LSEs, called the Integrated Resource Plan (IRP). The IRP is a comprehensive planning document that outlines CAISO's forecasts for electricity demand, supply, and transmission needs over a 20-year planning horizon, as well as its strategies for integrating renewable energy resources and other grid services to meet those needs. The plan is developed in collaboration with LSEs, regulators, and other stakeholders, and is updated periodically to reflect changes in the energy landscape and evolving policy goals. Overall, the IRP plays a critical role in ensuring the reliability and resilience of California's electricity grid as the state continues to transition to a cleaner and more sustainable energy system.

When an individual battery energy storage (BES) facility or generation infrastructure (i.e., solar panels) comes online in California, it is typically included in the IRP through a process known as the Interconnection Queue. The Interconnection Queue is managed by the CAISO, which oversees the operation of the State's electricity grid.

The Interconnection Queue

The Interconnection Queue is an application process that functions as a waiting list of proposed electricity generation and storage projects that are seeking to connect to the grid. When a new BES facility or generation infrastructure is proposed, the developer submits an application to CAISO to request an interconnection to the grid. CAISO evaluates the application to ensure that the facility meets technical and operational requirements, such as voltage regulation and frequency response, and that it can be integrated effectively into the grid.

Once the BES facility or generation infrastructure is approved by CAISO, it is assigned a point of interconnection on the grid, and its output is added to the IRP as a resource that can provide electricity and other grid services, such as frequency regulation or ramping support. The facility is then dispatched by CAISO based on its bids into the day-ahead and real-time electricity markets, and its output is used to help balance supply and demand on the grid in real-time.

Overall, the interconnection queue is an important mechanism for integrating new BES facilities and other electricity resources into the California grid, and for ensuring that the grid remains reliable and resilient as the state continues to transition to a cleaner and more sustainable energy system.

REGIONAL

SCAG's 2024-2050 RTP/SCS

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan (RTP/SCS). For the SCAG region, the 2024-2050 RTP/SCS, Connect SoCal, was

adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050 by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2024).

LOCAL

City of Costa Mesa 2015-2035 General Plan

The 2015-2035 General Plan was adopted by the City Council in June 2016 (Costa Mesa 2016). Existing goals, policies, and programs aimed at reducing energy impacts are primarily found in the Conservation Element and Circulation Element.

City of Costa Mesa Climate Action & Adaptation Plan

The City of Costa Mesa is developing its Climate Action & Adaptation Plan (CAAP), a comprehensive roadmap to reduce GHG emissions from both community-wide and municipal sources (Costa Mesa 2026). The plan will establish GHG emission reduction targets and outline a pathway to align with California's statewide climate goals, including carbon neutrality by 2045.

City of Costa Mesa Municipal Code

The City's Municipal Code is organized by title, chapter, article, and section. The following regulations relate to energy impacts.

- **Title 5, Chapter I, Section 5-1, *Construction Codes Adopted*,** adopts the 2025 California Building Code and the 2025 California Energy Code.
- **Title 13, Chapter IX, Article 12, *Transportation Demand Management*,** complies with state law and Orange Country Transportation Authority requirements by implementing a local trip reduction and Transportation Demand Management (TDM) program to help reduce traffic congestion from certain development projects. Applicable development shall provide improvements, such as preferential parking for carpool vehicles, bicycle parking and shower facilities, information on transportation alternatives, rideshare vehicle loading areas,

vanpool vehicle accessibility, bus stop improvements, employee locker rooms, and safe pedestrian circulation systems.

- **Title 13, Chapter VII, *Landscaping Standards*,** helps establish requirements and standards for the design, installation, water conservation, and maintenance of landscape and irrigation.
- **Title 5, Chapter X, *Small Residential Solar Energy System Permits*,** adopts an expedited, streamlined solar permitting process to achieve timely and cost-effective installations of small residential rooftop solar energy systems.
- **Title 5, Chapter XI, *Electric Vehicle Charging Station Permits*,** adopts an expedited streamlined permitting process to achieve timely and cost-effective installations of electric vehicle charging stations.

3.5.2 Existing Conditions

ELECTRICITY

The project area is in Southern California Edison's (SCE) service area, which spans much of southern California from Orange and Riverside counties on the south to Santa Barbara County on the west to Mono County on the north (SCE 2025). Total electricity demand in the SCE service area for the county was 19.225 billion kWh for 2024 (CEC 2026a).

Sources of electricity sold by SCE in 2024 were (CEC 2026b):

- 35 percent RPS eligible renewable resources (geothermal, eligible hydroelectric, solar, and wind)
- 5 percent large hydroelectric
- 9 percent nuclear
- 51 percent non-RPS eligible resources (natural gas and unspecific power [i.e., primarily fossil fuels]

NATURAL GAS

The Southern California Gas Company (SoCalGas) provides natural gas to the City of Costa Mesa. SoCalGas' service area spans much of the southern half of California, from Imperial County on the southeast to San Luis Obispo County on the northwest, to part of Fresno County on the north, to Riverside County and most of San Bernardino County on the east (CEC 2022b). Total natural gas consumption in SoCalGas's service area for the county was approximately 561.7 million therms in 2024 (CEC 2026c).

TRANSPORTATION FUELS

California is one of the top consumers of fuel for transportation. The CEC produces a California Annual Retail Fuel Outlet Report every year, which is a compilation of gasoline and diesel fuel sales across the state, available at the county level. According to the CEC, Orange County fuel sales totaled an estimated 1,155 million gallons of gasoline and 57 million gallons of diesel fuel in 2024 (CEC 2026d).

Table 3.5-1, *Existing Operation-Related Annual Fuel Usage*, shows the fuel usage associated with VMT currently generated under existing baseline conditions based on fuel usage data obtained from EMFAC2025 v.2.1.0 and VMT data provided by Fehr and Peers (see Appendix J.2). VMT is based on vehicle trips beginning and ending in the city boundaries and from external/internal trips (i.e., trips that either begin or end in the city).

Table 3.5-1 Existing Operation-Related Annual Fuel Usage

Fuel Type	Fuel Usage	
	VMT	**Gallons**
Gasoline	40,607,194	1,862,838
Diesel	2,743,358	298,162
Compressed Natural Gas	112,954	20,509
	VMT	**kWh**
Electricity	4,464,102	1,689,762

Source: EMFAC2025 v.2.1.0, Appendix B.1.

Note: Based on daily VMT provided by Fehr and Peers (Appendix J.2). VMT per year based on a conversion of VMT x 347 days per year to account for less travel on weekend, consistent with CARB statewide GHG emissions inventory methodology (CARB 2008).

3.5.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to energy if it would:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

To determine whether the proposed project would result in wasteful, inefficient, or unnecessary consumption of energy resources, this analysis utilizes the guidance provided in Appendix F, Energy Conservation, of the CEQA Guidelines as well as the analytical precedent set by *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) (75 Cal.App.5th 63, 164–168).

According to Appendix F, Energy Conservation, of the CEQA Guidelines, CEQA analyses should consider energy conservation goals, including: decreasing overall per capita energy consumption; decreasing reliance on fossil fuels such as coal, natural gas, and oil; and increasing reliance on renewable energy sources. In *League to Save Lake Tahoe Mountain*, the appellate court ruled that the analysis of wasteful, inefficient, and unnecessary energy consumption was inadequate because it did not consider whether additional renewable energy features could be added to the project.

The proposed project would be considered to result in a potentially significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources. Considering the guidance provided by Appendix F of the CEQA Guidelines and the appellate court decision in *League to Save Lake Tahoe Mountain*, the following energy conservation goals are considered in determining whether the proposed project could result in wasteful, inefficient, or unnecessary consumption of energy resources:

- Decreasing overall per capita energy consumption.
- Decreasing reliance on fossil fuels such as coal, natural gas, or oil.
- Increasing reliance on renewable energy sources.

It is important to note that these energy conservation goals are not used herein as bright-line significance thresholds but as an informative guide in assessing whether the proposed project could result in a potentially significant energy impact.

METHODOLOGY

The energy and fuel usage information provided in this section is based on the following:

- **Energy (Natural Gas and Electricity)**: The California Emissions Estimator Model (CalEEMod) Version 2022.1 default energy (i.e., electricity and natural gas) rates for nonresidential land uses are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019 (CAPCOA 2022). Use of the CalEEMod default energy rates for the nonresidential land uses result in conservative estimates compared to the recently adopted 2025 Building Energy Efficiency Standards because the commercial forecast is based on the energy demand per square foot of building space, land use subtype, and end use for the year 2019. In addition, CalEEMod default energy rates for residential uses are based on the CEC Residential Appliance Saturation Study (RASS) also completed in 2019. The RASS surveyed 40,000 homes built between 1935 and 2015 with the average home constructed in 1974 (CAPCOA 2022). Thus, the CalEEMod

default energy rates for residential uses also result in conservative energy demand estimates compared to the 2022 Building Energy Efficiency Standards. It is anticipated that new buildings under the latest standards would generally result in lower electricity and natural gas demand compared to the CalEEMod default energy rates.

- **On-Road Fuel Use:** Fuel use was based on origin-destination (O-D) method VMT provided by Fehr and Peers and modeled using emissions data with adjusted factors from CARB's EMFAC2025 v.2.1.0 web database for calendar year 2025 (existing conditions) and 2045 (forecasted) emission rates.

3.5.4 Project Impact Analysis

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Short-Term Construction Impacts

Construction of development associated with the proposed project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use.

Electrical Energy

Construction activities associated with the proposed project would require electricity to power the construction equipment. Construction of the proposed project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from various development phases including demolition, site preparation, mass grading, utility trenching, building construction, paving, architectural coating, and roadway improvements. The electricity use during construction would vary during different phases of construction. The majority of construction equipment during demolition and grading would be gas or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. Overall, the use of electricity would be temporary in nature and would fluctuate according to the phase of construction. Additionally, it is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Therefore, construction activities of the proposed project would not result in wasteful, inefficient, or unnecessary electricity demands as electricity consumption would be limited to tasks necessary to complete project construction, and impacts would be less than significant.

Natural Gas Energy

It is not anticipated that construction equipment used for development accommodated by the proposed project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, no impact is anticipated with respect to natural gas usage during the proposed project's construction.

Liquid Fuels and Transportation Energy

Transportation energy use depends on the type and number of trips, VMT, fuel efficiency of vehicles, and travel mode. Additionally, transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline.

The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. It is anticipated that the majority of off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered. In addition, all construction equipment would cease operating upon completion of the proposed project's construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

Furthermore, to limit wasteful and unnecessary energy consumption, the construction contractors would minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of CCR, Title 13, Article 4.8, Chapter 9, which limits nonessential idling of diesel-powered off-road equipment to five minutes or less. Also, construction trips would not result in unnecessary use of energy since the project area is centrally located and is served by numerous regional freeway systems (e.g., State Route 55, State Route 73, and Interstate 405) that provide the most direct routes from various areas of the region. Thus, transportation energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

Long-Term Impacts During Operation

Operation of buildings associated with new land uses accommodated under the proposed project would create additional demands for electricity and natural gas. Operational use of energy would also include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor and outdoor lighting.

Building Energy: Electricity and Natural Gas

The electricity and natural gas consumption from implementation of the proposed project is shown in Table 3.5-2, *Operation-Related Electricity and Natural Gas Consumption*. At full buildout, the proposed project would result in a total increase in electricity demand of 15,875,398 kWh/yr and natural gas demand of 48,456,978 KBTU/yr.

Table 3.5-2 Operation-Related Electricity and Natural Gas Consumption

Land Use	Electricity (kWh/year)[1]	Natural Gas (kBTU/year)[1]
Apartment Mid-Rise	14,663,336	44,427,372
High Turnover (Sit Down Restaurant)	1,212,061	4,029,606
Total	**15,875,398**	**48,456,978**

Source: CalEEMod Version 2022.1. Appendix B.1.
Note: kWh=kilowatt-hour; KBTU=kilo-British thermal unit
1. Does not account for effects of the Building Energy Efficiency Standards on overall electricity and natural gas demand.

As described under Section 3.5.3, *Methodology*, CalEEMod default energy rates were used to estimate energy demand of the proposed project. The CalEEMod default energy rates for residential and nonresidential uses are based on surveys conducted in 2019 of older homes and nonresidential buildings built prior to the 2025 Building Energy Efficiency Standards. Thus, the energy demand for the proposed project does not account for increases in energy efficiency and reduction in overall energy demand associated with the 2025 Building Energy Efficiency Standards.

While the proposed project would generate an increase in electricity and natural gas demand, the new land uses under the proposed project would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements. Compliance with the current and future iterations of Building Energy Efficiency Standards and CALGreen would be consistent with the goals outlined in Appendix F of the CEQA Guidelines, as the proposed project would promote the use of renewable energy and decrease reliance on fossil fuels to meet the energy demands of the proposed project.

The 2025 Building Energy Efficiency Standards expand upon previous requirements to support the transition to electrification and on-site renewable energy. Mixed-fuel single-family homes are now required to be electric-ready, enabling the future replacement of gas appliances with electric alternatives. In addition, the 2025 standards continue to include prescriptive photovoltaic (PV) system requirements for both residential and nonresidential buildings. While the ESS-ready requirement does not mandate the immediate installation of battery storage, it facilitates future adoption by removing potential barriers to on-site energy storage. For multifamily residential buildings of four stories or more, as well as nonresidential buildings,

compliance with prescriptive standards may require the installation of both PV systems and battery storage, further supporting energy resilience and reducing reliance on fossil fuels.

Under the 2025 Building Energy Efficiency Standards, projects may comply with energy efficiency requirements using either a prescriptive or performance-based pathway. The performance pathway provides flexibility in design by allowing energy modeling to demonstrate compliance rather than following every individual prescriptive requirement. For performance compliance, a proposed design must achieve an energy budget (in terms of source energy and long-term system cost) that is equal to or lower than that of the "Standard Design Building," which represents a baseline building that incorporates all mandatory and prescriptive energy efficiency measures at their minimum levels (including the relevant PV system and, where applicable, battery energy storage system requirements). Improvements in energy efficiency beyond the minimum prescriptive requirements can be used in the performance model to reduce on-site PV system size or other demand components where allowed by the standards. Therefore, even if a project does not install a PV system or battery storage under the performance approach, it must still meet an equivalent energy performance level to the prescriptive pathway.

Because the proposed project would comply with these updated 2025 standards and incorporate measures that enhance energy efficiency and support renewable energy use, it would not result in wasteful, inefficient, or unnecessary electricity or natural gas demands. Additionally, while not a requirement under the proposed project, the FDCSP encourages implementation of fully electric design for the residential uses at the project site. Consequently, operation of the proposed project would have a less-than-significant impact with respect to electricity and natural gas.

Transportation Energy

The new land uses accommodated under the proposed project would result in the consumption of transportation energy during operation from the use of motor vehicles. Table 3.5-3, *Operation-Related Fuel Usage,* shows the increase in VMT, fuel usage, and fuel efficiency under buildout year 2045 conditions from existing baseline year 2025 conditions and existing uses under year 2045 conditions.

Table 3.5-3 Operation-Related Fuel Usage

Fuel Type	Existing Baseline Year 2025	Existing Year – No Project 2045	Proposed Project Buildout Year 2045	Net Change From Existing Baseline Year 2025	Net Change From Existing Year 2045
Gasoline					
VMT	40,607,194	25,354,750	25,548,107	-15,059,087	193,357
Gallons	1,862,838	1,007,725	1,015,410	-847,428	7,685
Miles Per Gallon	21.80	25.16	25.16	3.36	0.00
Diesel					
VMT	2,743,358	4,230,076	4,262,335	1,518,977	32,259
Gallons	298,162	390,487	393,465	95,303	2,978
Miles Per Gallon	9.20	10.83	10.83	1.63	0.00
Compressed Natural Gas					
VMT	112,954	96,563	97,299	-15,654	736
Gallons	20,509	13,093	13,193	-7,316	100
Miles Per Gallon	5.51	7.37	7.37	1.87	0.00
Electricity					
VMT	4,464,102	18,246,218	18,385,365	13,921,263	139,147
Kilowatt Hour	1,689,762	7,547,061	7,604,615	5,914,853	57,554
Miles Per kWh	2.64	2.42	2.42	-0.22	0.00

Source: CalEEMod Version 2022.1; EMFAC2025 v.2.1.0; Appendix B.1.

As shown in the table, when compared to existing year 2025 conditions, the proposed project would result in a decrease in VMT and annual fuel demand for gasoline- and compressed natural gas-powered vehicles. Overall fuel efficiency for gasoline-, diesel-, and compressed natural gas-powered vehicles would also increase. For electric vehicles, demand would increase and efficiency would slightly decrease compared to existing conditions. The decrease in gasoline fuel consumption and an increase in electricity use reflects EMFAC assumptions regarding a growing share of electric vehicles in the future fleet based on ongoing market trends toward vehicle electrification.

Compared to existing uses under year 2045 conditions, the proposed project would result in an increase in VMT and fuel usage for all fuel types (see “Net Change from Existing Year 2045” column of Table 3.5-3). However, the fuel efficiency would be the same, and implementation of the proposed project would not result in less fuel efficiency across the various fuel types.

Although federal vehicle efficiency regulations continue to evolve, improvements in vehicle fuel efficiency are expected over time through natural fleet turnover, as older, less efficient vehicles are gradually replaced with newer models. Advances in automotive technology and car manufacturer design improvements have generally resulted in newer vehicles achieving higher fuel efficiency compared to older vehicles in the existing fleet. As these newer vehicles enter the fleet over the life of the proposed project, overall fuel consumption is expected to decrease relative to current conditions.

While VMT associated with electric vehicles (EVs) and thus electricity usage would increase under the buildout year 2045 scenario when compared to existing baseline, improvements in EV energy efficiency are anticipated. In conjunction with the regulatory (i.e., RPS, SB 350, SB 100, SB 1020) and general trend toward increasing the supply and production of energy from renewable sources, it is anticipated that a greater share of electricity used to power EVs will be from renewable sources in future years (e.g., individual PV systems and/or purchased electricity from SCE that is generated from renewable sources).

As discussed further in Chapter 3.15, *Transportation*, of this DEIR, the proposed project is not forecast to exceed the City's O-D method and boundary method VMT thresholds. A decrease in VMT per service population suggests fewer vehicle trips and shorter trip distances because the elements of the proposed project would also accommodate improvements to the bicycle, pedestrian, and transit infrastructure. Specifically, the proposed project would include new on-site bicycle and pedestrian facilities to promote multimodal travel, implement transportation demand management (TDM) strategies to reduce single-occupancy vehicle trips, and coordinate with the Orange County Transportation Authority (OCTA) to support and enhance transit ridership (refer to Table 3.15-3, *Proposed Project Consistency with Costa Mesa's Circulation Element Goals and Policies).*

Furthermore, the proposed project has several objectives, including improving connectivity and mobility and promoting a walkable, well-connected neighborhood. The project area is served by accessible public transit and an existing network of pedestrian and bicycle infrastructure. These features of the proposed project would encourage walking, biking, and public use transit, which would contribute to a reduction in VMT and transportation-related fuel usage. Overall, operation-related fuel usage associated with the proposed project would not be inefficient, wasteful, or unnecessary. Therefore, impacts would be less than significant with respect to operation-related fuel usage.

Summary

Overall, operation of the proposed project, together with applicable federal, State, and local regulations, would ensure that energy demand from future growth is not inefficient, wasteful, or unnecessary. Therefore, energy impacts associated with implementation and operation of land uses accommodated under the proposed project would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project's consistency with the California Energy Action Plan, Long-Term Energy Efficiency Strategic Plan, and the City's General Plan are discussed separately below.

Energy Action Plan

As discussed in Section 3.5.1, *Regulatory Framework*, the Energy Action Plan was last updated in 2008 and was developed by the CPUC, CEC, and California Power Authority to create a unified State energy policy framework. It serves as one of the State's strategies for planning for reliable, affordable, and environmentally responsible energy procurement and supply. The Energy Action Plan further establishes a "loading order" for statewide energy planning efforts, which translates into first prioritizing meeting existing demand with cost-effective energy efficiency and demand response efforts, then using renewable energy resources and distributed generation, and finally meeting the remaining energy demand with renewable or otherwise "clean" fossil-fuel power generation resources (e.g., renewable natural gas). Other priorities identified in the Energy Action Plan but not directly related to local agencies include modernizing transmission and distribution infrastructure, enhancing reliability in electricity and natural gas markets, and ensuring affordable access to all Californians. Therefore, the proposed project can be assessed for consistency with the Energy Action Plan by examining how its policies generally support or conflict with the strategies of the plan, such as promoting energy resource deployment consistent with the plan's loading order.

The proposed project would be consistent with the goals of the State's Energy Action Plan, which prioritizes energy efficiency, reduced energy demand, and sustainable land use planning. By complying with current Building Energy Efficiency Standards, the proposed project would support the Plan's objective of meeting new energy needs through efficiency improvements before expanding energy supply. The mixed-use development pattern would promote efficient land use and reduce the need for vehicle trips by integrating residential and nonresidential uses in close proximity. In addition, the proposed project would incorporate pedestrian and bicycle improvements to encourage alternative modes of travel, consistent with the Energy Action Plan's emphasis on reducing transportation-related energy use. Therefore, the proposed project would be considered consistent with the Energy Action Plan strategies, and this impact would be less than significant.

Long-Term Energy Efficiency Strategic Plan

As discussed in Section 3.5.1, *Regulatory Framework*, the Long-Term Energy Efficiency Strategic Plan was last updated in 2011 and serves as the State's long-term roadmap to make energy

efficiency a top priority in supporting California's grid harmonization and renewable energy integration efforts. As discussed, its key policies include achieving a zero net energy performance for all new residential construction by 2020 and all new commercial construction by 2030. While the 2020 benchmark goal for new residential construction has passed, the goal continues to underpin the triennial updates to the California Building Standards Code. The Long-Term Energy Efficiency Strategic Plan is a living strategic document for State and local agencies and emphasizes the integration of energy-efficiency policies and measures into planning efforts as a critical component to advancing the objectives of the plan. Therefore, the proposed project can be assessed for consistency with the Long-Term Energy Efficiency Strategic Plan by examining how its policies generally support or conflict with the strategies of the plan, such as promoting compact in-fill development, green building standards, and zero net energy readiness.

The proposed project would be consistent with the Long-Term Energy Efficiency Strategic Plan because it would be constructed to meet or exceed current Building Energy Efficiency Standards, thereby supporting the Plan's overarching goal of maximizing energy savings and encouraging energy efficiency. The mixed-use design encourages efficient land use and reduced overall energy demand by integrating residential and nonresidential uses, which aligns with the Plan's emphasis on reducing energy consumption through sustainable building and urban design strategies. In addition, the proposed project would include pedestrian and bicycle improvements to enhance non-automobile travel opportunities and support reduced transportation related energy consumption, consistent with the Strategic Plan's objective of achieving long-term, sustainable energy use reductions. Therefore, the proposed project would be considered consistent with the Long-Term Energy Efficiency Strategic Plan strategies, and this impact would be less than significant.

General Plan Consistency

As described in Table 3.10-1, *Consistency with General Plan Goals and Policies*, the proposed project would incorporate sustainable land use, support multimodal transportation infrastructure, and be constructed to the latest Building Energy Efficiency Standards. These project features are expected to help reduce energy consumption by encouraging walking, biking, and shorter vehicle trips and improving energy efficiency in the proposed buildings. Therefore, the proposed project would align with the primary objectives of City's General Plan goals and policies. This impact would be less than significant.

Summary

As discussed previously, the proposed project would include project features which directly support the strategies outlined in the Energy Action Plan, Long-Term Energy Efficiency Strategic Plan, and the City's General Plan. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.5.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to energy?

As this analysis assesses whether energy consumption from the proposed project would result in wasteful, inefficient, or unnecessary consumption of resources, the geographic area relevant to cumulative energy impacts is the project area. The area considered for cumulative impacts to electricity and natural gas supplies and facilities is SCE and SoCalGas service areas. Analysis of whether the proposed project's energy demand would be within SCE's and SoCalGas's service capacity and require new or expanded facilities is in Section 3.17, *Utilities and Service Systems*, of this EIR.

Other future development in the SCE and SoCalGas service areas would be subject to existing state regulations, such as the California Energy Code and CALGreen Code. New buildings would use new energy-efficient appliances and equipment, pursuant to the Appliance Efficiency Regulations. These measures would reduce the overall consumption of electricity and natural gas. Consequently, the proposed project's potential contribution to cumulative impacts on energy would be **less than significant**.

Significance without Mitigation: Less than significant.

3.5.6 References

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3.6 GEOLOGY AND SOILS

This section of the DEIR evaluates the potential for the Fairview Developmental Center Specific Plan (proposed project) to impact geological and soil resources, paleontological resources, or unique geologic features in the City of Costa Mesa. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary. The analysis in this section is based, in part, upon the following source(s):

- *Paleontological Resources Evaluation,* ECORP, January 2026 (DEIR Appendix E.1)
- *Phase I Environmental Site Assessment*, Avocet Environmental Inc., April 2020 (DEIR Appendix F.1)
- Phase II Environmental Site Assessment, Avocet Environmental Inc., July 2021 (DEIR Appendix F.2)

Notice of Preparation Comments

The City received no comment letters regarding geology and soils, for the Notice of Preparation (NOP). For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the comment letters.

3.6.1 Regulatory Framework

FEDERAL

Soil Hazards

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977 (Public Law 95-124) established the National Earthquake Hazards Reduction Program, which is coordinated through the Federal Emergency Management Agency, the United States Geologic Survey (USGS), the National Science Foundation, and the National Institute of Standards and Technology. This program was substantially amended in November 1990 by the National Earthquake Hazards Reduction Program Act (NEHRPA), which refined the description of agency responsibilities, program goals, and objectives.

NEHRPA's mission includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improved building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improved mitigation capacity; and accelerated application of research

results. The NEHRPA designates Federal Emergency Management Agency as the program's lead agency and assigns several planning, coordinating, and reporting responsibilities. Other NEHRPA agencies include the National Institute of Standards and Technology, National Science Foundation, and USGS.

Occupational Safety and Health Administration Regulations

The Occupational Safety and Health Administration's (OSHA) Excavation and Trenching standard, Title 29 of the Code of Federal Regulations (CFR), Part 1926, Subpart P, contains requirements for excavation and trenching operations. The standards apply to all open excavations in the Earth's surface. Following the standards will prevent or greatly reduce the risk of cave-ins and other excavation-related incidents.

Paleontological Resources

Paleontological Resources Preservation, Omnibus Public Lands Act

This legislation directs the Secretaries of the US Departments of the Interior and Agriculture to manage and protect paleontological resources on federal land using "scientific principles and expertise." To formulate a consistent paleontological resources management framework, the Paleontological Resources Preservation Act (PRPA), Public Law 111-011, Title VI, Subtitle D, incorporates most of the recommendations from the report of the Secretary of the Interior titled "Assessment of Fossil Management on Federal and Indian Lands." In passing the PRPA, Congress officially recognized the scientific importance of paleontological resources on some federal lands by declaring that fossils from these lands are federal property that must be preserved and protected. The PRPA codifies existing policies of the Bureau of Land Management, National Park Service, US Forest Service, Bureau of Reclamation, and US Fish and Wildlife Service, and provides the following.

- Uniform criminal and civil penalties for illegal sale and transport, and theft and vandalism of fossils from federal lands.
- Uniform minimum requirements for paleontological resource-use permit issuance (terms, conditions, and qualifications of applicants).
- Uniform definitions for "paleontological resources" and "casual collecting."
- Uniform requirements for curation of federal fossils in approved repositories.

Antiquities Act of 1906

The Antiquities Act of 1906 (16 US Code secs. 431–433) was the first US law to provide general legal protection of cultural and natural resources of historic or scientific interest on federal

lands, including paleontological resources (NPS 2025a). The Antiquities Act was used to proclaim several national monuments based upon significant paleontological resources (NPS 2025b). It states, in part:

> ...that any person who shall appropriate, excavate, injure or destroy any historic or prehistoric ruin or monument, or any object of antiquity, situated on lands owned or controlled by the Government of the United States, without the permission of the Secretary of the Department of the Government having jurisdiction over the lands on which said antiquities are situated, shall upon conviction, be fined in a sum of not more than five hundred dollars or be imprisoned for a period of not more than ninety days, or shall suffer both fine and imprisonment, in the discretion of the court. (54 United States Code Section 320302)

STATE

Soil Hazards

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (California Public Resources Code (PRC) secs. 2621–2624) was passed in 1972 to mitigate the hazard of surface faulting to structures intended for human occupancy. The Alquist-Priolo Act's main purpose is to prohibit siting buildings used for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. The Alquist-Priolo Act requires the State Geologist to establish regulatory zones, known as "Earthquake Fault Zones," delineating appropriately wide earthquake fault zones to encompass potentially active and recently active traces of faults. Local agencies must regulate most development projects within these zones. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed human occupancy structures would not be constructed across active faults. A licensed geologist must prepare an evaluation and written report of a specific site. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back, typically at least 50 feet from the fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (PRC secs. 2690–2699.6) directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards.

The Seismic Hazards Mapping Act provides a statewide seismic hazard mapping and technical advisory program to assist cities, counties, and state agencies, which are directed to use the seismic hazard zone maps in their land use planning and permitting processes. This act requires site-specific hazards investigations to be conducted by licensed professionals within “zones of required investigation” to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Evaluation and mitigation of seismic hazards are to be conducted under guidelines established by the California State Mining and Geology Board (SMGB) (CGS 2008).

Seismic Hazards and Zones of Required Investigation

The Alquist-Priolo Earthquake Fault Zoning Act and the Seismic Hazards Mapping Act direct the State Geologist to delineate regulatory "zones of required investigation" to reduce the threat to public health and safety and to minimize the loss of life and property posed by earthquake-related ground failures and other hazards. Cities and counties affected by these zones are required to regulate development within them. The two acts also require sellers of real property (and their agents) within a mapped hazard zone to disclose that fact at the time of sale.

The zones of required investigation—listed below for potential earthquake faulting, liquefaction, landslides, and tsunamis—are delineated and distributed to cities, counties, and state construction agencies to help identify where higher building standards may be necessary for safe development. Statutes require that cities and counties use all four of these zones as part of their construction permitting process.

- **Alquist-Priolo Earthquake Fault Zones.** These zones are intended to prevent buildings for human occupancy from being constructed upon active faults.
- **Liquefaction Zones.** These zones identify where the stability of foundation soils must be investigated and countermeasures undertaken in the design and construction of buildings for human occupancy.
- **Earthquake-Induced Landslide Zones.** These zones identify where the stability of hillslopes must be evaluated and countermeasures undertaken in the design and construction of buildings for human occupancy.

California Seismic Hazards Program

The Seismic Hazards Program delineates areas prone to ground failure and other earthquake-related hazards including surface fault rupture, liquefaction, earthquake-induced landslides, and tsunami inundation. Cities and counties are required to use these maps in their land use planning and building permit processes to identify and mitigate these hazards for development projects prior to the next major earthquake.

California Building Standards Code

California Code of Regulations (CCR) Title 24, also known as the California Building Standards Code, regulates how buildings are designed and constructed, and is intended to ensure the maximum structural integrity and safety of private and public buildings. Title 24 is composed of 12 "parts." Parts 2, 10, and 12 of Title 24 are relevant to geology, soils, and mineral resources, as described below.

Title 24 Part 2, California Building Code. The California Building Code (CBC) contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. The CBC provides minimum standards to safeguard life and limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, and location and maintenance of all buildings and structures and certain equipment. The CBC is based on the International Building Code (IBC), with necessary California amendments. The CBC is updated every three years. The current CBC was published on July 1, 2025, and became effective on January 1, 2026. The CBC outlines seismic safety standards and design and construction requirements. Development projects must show compliance with the CBC through the development review process prior to obtaining building permits. The CBC includes estimates for maximum earthquake magnitudes and peak ground acceleration, soil classifications and expansion potential, seismic design categories and lateral pressure, and grading and surface drainage.

Title 24 Part 10, California Existing Building Code. The California Building Standards Commission adopted certain provisions of the International Existing Building Code, Appendix Chapter A1, Seismic Strengthening Provisions for Unreinforced Masonry Bearing Wall Buildings.

Title 24 Part 12, California Reference Standard Code. The California Referenced Standards Code compiles minimum test and reference standards required by the Building Standards Commission.

The California Geological Survey Special Publication 42

The CGS Special Publication 42, “Earthquake Fault Zones” is a guide for government agencies, property owners / developers, and geoscience practitioners for assessing fault rupture hazards in California. The purpose of these guidelines under the Alquist-Priolo Earthquake Fault Zoning Act is to regulate development near active faults so as to mitigate the hazard of surface fault rupture.

Paleontological Resources

California Public Resources Code

The PRC protects paleontological resources in specific contexts. PRC Section 5097.5 prohibits knowing and willful excavation, removal, destruction, injury, and defacement of any vertebrate paleontological feature on public lands without express authorization from the agency with jurisdiction. Violation of this prohibition is a misdemeanor and is subject to fine or imprisonment (PRC sec. 5097.5(c)), and people convicted of such a violation may also be required to provide restitution (PRC sec. 5097.5(d)(1)). Additionally, PRC Section 30244 requires "reasonable mitigation measures" to address impacts on paleontological resources identified by the State Historic Preservation Officer.

LOCAL

Soil Hazards

City of Costa Mesa General Plan

The Costa Mesa General Plan provides the basis for the City's policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide development and conservation through 2035. Key policies of the General Plan relevant to this chapter's analysis of the proposed project's potential geologic impacts are included below. The set of policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection of policies relevant to the impact discussion in this chapter.

Safety Element

Objective S-1A: Work to mitigate and prevent potential adverse consequences of natural and human-caused disasters.

- **Policy S-1.1.** Continue to incorporate geotechnical hazard data into future land use decision-making, site design, and construction standards.
- **Policy S-1.5.** Enforce applicable building codes relating to the seismic design of structures to reduce the potential for loss of life and property damage.
- **Policy S-1.7.** Continue to implement the Seismic Hazard Mapping Act, which requires sites within liquefaction hazard areas to be investigated for liquefaction susceptibility prior to building construction or human occupancy.

- **Policy S-1.8.** Consider site soils conditions when reviewing projects in areas subject to liquefaction or slope instability.

City of Costa Mesa Municipal Code

Municipal Code Section 5-1, Construction Codes Adopted, adopts the CBC, 2026 edition, based on the 2021 IBC as published by the International Code Council for the purpose of prescribing regulations for construction, demolition, occupancy, equipment use, height, and area of buildings and structures.

City of Costa Mesa Local Hazard Mitigation Plan

The Local Hazard Mitigation Plan (LHMP) is a crucial tool for emergency planners and first responders to minimize the harm caused by disasters. It focuses on optimizing the mitigation phase of the cycle, aiming to make a community more resilient to disasters. The City of Costa Mesa, like other communities, could potentially suffer severe harm from hazard events. The LHMP provides a comprehensive assessment of threats from natural and human-caused hazard events and a coordinated strategy to reduce these threats. It identifies resources and information to help community members, staff, and officials understand local threats and make informed decisions. The LHMP also supports increased coordination and collaboration between the City, public agencies, local employers, service providers, community members, and other stakeholders (Costa Mesa 2022).

Paleontological Resources

City of Costa Mesa General Plan

The Costa Mesa General Plan provides the basis for the City's policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide development and conservation through 2035. Key policies of the General Plan relevant to this chapter's analysis of the proposed project's potential paleontological impacts are included below. The set of policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection of policies relevant to the impact discussion in this chapter.

Historical and Cultural Resources

Objective HCR-1A: Encourage preservation and protection of the City's archaeological, paleontological, and historical resources.

- **Policy HCR-1.9.** Require paleontological studies for all applicable discretionary projects. The studies should identify paleontological resources in the project area, and provide mitigation measures for any resources in the project area that cannot be avoided.

- **Policy HCR-1.10.** Comply with the California Environmental Quality Act regarding the protection and recovery of paleontological resources during development activities.

3.6.2 Existing Conditions

GEOLOGIC SETTING

Regional Geology

The project site is situated on the Coastal Plain of Orange County, an alluvial plain underlain by a structural depression filled with up to 20,000 feet of sediments and rocks of marine and nonmarine origin. The Orange County Coastal Plain is bounded by the Puente and Chino Hills to the north, the Santa Ana Mountains to the east, the San Joaquin Hills to the south, the Pacific Ocean to the southwest, and a low topographic divide near the Orange County-Los Angeles County line to the northwest.

Local Geology

More locally, the project site is situated in the central portion of Newport Mesa, an elevated coastal mesa between the Santa Ana River to the west and Upper Newport Bay to the east. Newport Mesa and other relief features along the coast are the result of ground surface uplift along the Newport-Inglewood fault zone. Ancient meandering of the Santa Ana and San Gabriel rivers carved gaps through these relief features, typically resulting in coarser sedimentary deposits (sands and gravels) in gaps between elevated, lower permeability mesas. These gaps have been named, from north to south, Alamitos Gap, Sunset Gap, Bolsa Gap, and Talbert/Santa Ana Gap. Newport Mesa is immediately south of the Talbert/Santa Ana Gap, and the mesa surface slopes down steeply to this gap approximately 1,500 feet to the west of the subject site. The ground surface elevation at the site itself ranges from approximately 70 to 80 feet above mean sea level and slopes gently to the north, away from the Pacific Ocean, which is approximately 3 miles away.

Newport Mesa is a wave-cut bench in Pliocene- and Miocene-age Capistrano and Monterey Formations. The Capistrano Formation is generally composed of siltstone, fine sandstone, and shale with local limestone concretions, conglomerate, and breccia lenses. The Monterey Formation is composed of siliceous and diatomaceous shale, siltstone, and claystone with local sandstone and calcareous beds. Overlying these sedimentary strata in the Newport Mesa area are Quaternary-age marine terrace deposits and stream (fluvial) deposits. These deposits are described as poorly to moderately consolidated sand to silty sand with local gravel (see Appendix F.1).

SEISMIC SETTING

Fault Rupture

Alquist-Priolo Earthquake Fault Zones are regulatory zones surrounding the surface traces of active faults in California that have ruptured in the last 11,000 years (DOC 2025a). An active fault has the potential for surface rupture, and a structure for human occupancy cannot be placed over the fault but must be a minimum distance from the fault (generally 50 feet). As identified by the Costa Mesa General Plan the only active fault that traverses Costa Mesa is the Newport-Inglewood Fault (Costa Mesa 2015). However, based on the California Geological Survey's Earthquake Zones of Required Investigation, no active faults or Alquist-Priolo fault zones traverse the city or project site (DOC 2025b). The closest Alquist-Priolo earthquake fault zone is the Newport-Inglewood-Rose Canyon Fault Zone 3.10 miles west of the project site. Surface fault rupture would not be a significant hazard (Costa Mesa 2015).

Seismic Ground Shaking

Ground shaking is the effect of surface motion generated by an earthquake that results in the majority of damage during seismic events. Several factors control how ground motion interacts with structures, making the hazard of ground shaking difficult to predict. Seismic waves propagating through the Earth's crust are responsible for the ground vibrations normally felt during an earthquake.

The effects of ground shaking in Costa Mesa will vary considerably depending upon the distance of a seismic event relative to the City (Costa Mesa 2015). Five regional major faults—the Newport-Inglewood, San Joaquin Hills, Whittier, San Andreas, and San Jacinto—present a seismic hazards to the City. The Bolsa-Fairview fault of the Newport-Inglewood fault zone is the closest fault to the project site, approximately one mile northwest (DOC 2025c). The intensity of earthquake ground motion at the site would depend on the characteristics of the generating fault, distance to the earthquake epicenter, and magnitude and duration of the earthquake. Strong to very strong ground shaking could occur at the project site during a large earthquake on one of the nearby faults.

GEOLOGIC HAZARDS

Landslides

Landslides are a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors. These factors are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity. The project site is primarily flat and is situated on a gentle north-facing back slope; however, there are no steep slopes in the vicinity of the project site.

Based on the US Land Slide Inventory and Susceptibility Mapper, the project site is not within an area of possible landslides; however, the southeast corner of the project site has a level 1 landslide susceptibility, which indicates a low potential (USGS 2025a).

Liquefaction

Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based on three main contributing factors:

1. Cohesionless, granular soils having relatively low densities (usually of Holocene age).
2. Shallow groundwater (generally less than 50 feet).
3. Moderate to high seismic ground shaking.

Cohesionless and granular soils are sand or gravel, typically with little or no clay content. Soil liquefaction generally occurs in submerged granular soils and non-plastic silts during or after strong ground shaking. Portions of the city are in liquefaction zones, but the project site is not in a liquefaction hazard zone (Costa Mesa 2015). The nearest liquefaction zone is approximately 0.7 miles to the west (DOC 2025b).

Subsidence

Subsidence occurs when the level of the ground decreases, as if the surface is sinking. Subsidence can either be sudden (as in a sinkhole) or happen gradually over time. It can be caused by mining, groundwater pumping, or fossil fuel extraction, creating empty underground spaces that can collapse and cause the soil above to drop. Erosion, natural cave collapses, and seismic activity can also cause subsidence. The City of Costa Mesa and project site are in an area of land subsidence in California due to groundwater pumping (USGS 2025b).

Expansive Soils

Expansive soils swell when they become wet and shrink when they dry out, resulting in the potential for cracked building foundations and, in some cases, structural damage to the buildings. Based on the web soil survey mapper, the underlying soil contains approximately 94.8 percent of Myford Sandy loam (172 and 175), 4.2 percent of Cropley Clay (149), and 1 percent of Omni Clay (184) (USDA 2025). The soil plasticity index (PI) identifies the soil's ability to change shape, and the IBC states that a PI of 15 or greater (IBC Section 1803.5.3) is considered an expansive soil. The majority of the site contains Myford Sandy loam with a PI of 13.8; however, expansive soils exist on-site with the presence of Cropley Clay and Omni Clary with PIs of 33 and 26, respectively.

Collapsible Soils

Collapsible soils generally consist of relatively dry, low-density materials that become weaker and more compressible with the addition of water or excessive loading. All compacted soil types are susceptible to collapse, including clean sand, silty and clayey sands, and fine-grained materials (clays and silts). Four conditions are necessary for soil collapse:

- An open, partially unstable, partially saturated fabric.
- Sufficient total stress to make the soil structure metastable (in state of equilibrium).
- Presence of a bonding agent, such as water, or sufficient soil suction to stabilize the soil in the metastable condition.
- Addition of water, which reduces soil suction or softens/destroys the bonding agent, thereby causing shear failures at the inter-aggregate or inter-particle contacts. (Caltrans 2024)

Based on the information provided in the Phase I ESA, the groundwater beneath the FDC likely occurs somewhere between 50 and 100 feet below ground surface (bgs) (Appendix F.1). As part of the Phase II, borings were conducted on-site and groundwater was not encountered within 15 feet bgs (Appendix F.2). Therefore, it is unlikely for groundwater to be the cause of collapsible soils. However, the soil and soil deposits underlying the project site are described as poorly to moderately consolidated sand to silty sand, and a mixture of poorly graded fine-grained sands, silts, and, to a lesser extent, clays (Appendix F.1, and F.2). Poorly graded fine sands contain a high void ratio or are considered open, and silts is a critical component that provides cohesion from suction. In addition, the limited amount of clay within the underlying soils can act as a weak bonding agent and once wetted the soils can pose risk of collapse. Thus, the soil underlying the project site has the potential for collapse.

Erosion

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved; removed from one place; and transported to another. Precipitation, running water, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. Accelerated erosion in a developed area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

Erosion can occur when rainfall or other sources result in the placement of a significant amount of water on a sloping, bare-earth surface. Eroded soils can cause damage if they enter a waterway or a storm drain facility that deposits the collected water and entrained sediment into bodies of water. Soils throughout the project site are developed and paved or already vegetated, leading to minimal erosion.

PALEONTOLOGICAL SETTING

A comprehensive paleontological assessment of Orange County, which included the City of Costa Mesa, was undertaken in 1980. The geology of Costa Mesa was determined to be part of the Palos Verdes Formation, a collection of sand and gravel deposits approximately 100,000 years old. These deposits were formed when Costa Mesa was covered by the Pacific Ocean. Often called Palos Verdes Sand, these deposits contain evidence of the kinds of marine life that inhabited the area prior to the ocean receding, exposing the current terrestrial landmass of Costa Mesa. The results of the paleontological assessment identified eight unique paleontological sites consisting of a variety of gastropods (e.g., marine snails) and bivalves (e.g., clams, oysters, and mussels) (Costa Mesa 2015).

Paleontological Assessment

The project site consists of old paralic deposits overlain by alluvial-fan deposits (late to middle Pleistocene) capped by thin, younger, locally derived, sandy alluvial fan deposits. Quaternary older alluvium of late to middle Pleistocene age is known to produce paleontological resources if those depths are reached during construction activities. Approximately 3.5 miles northeast of the project site, geotechnical studies at the proposed residential development at 3150 Bear Street indicated that the Quaternary-age alluvial fan deposits consisted of olive brown, yellowish brown, brown, and brownish gray clay, silty clay, sandy clay, clayey sands, and silty sands.

A paleontological record search through the Natural History Museum of Los Angeles County (NHMLAC) did not identify any records of paleontological resources within the project site. However, fossil localities from sedimentary deposits similar to those that may occur within the project site—either at the surface or at depth—are located nearby, see Table 3.6-1, *Closest Known Fossil Localities*. The NHMLAC did, however, have a record of fossils of sea turtle (Cheloniidae), camel (Camelidae), and mammoth (Mammuthus sp.) bones from older Quaternary deposits underlying the younger Quaternary.

Table 3.6-1 Closest known Fossil Localities

Location	Formation	Taxa	Depth
Newport Bay Mesa	Unknown formation (Pleistocene)	Invertebrates (Dentalium, Chione, Lucinoma, Cyclocardia, Pomaulax, Epilucina, Luchisca, Clinocardium, Balanus, Pododesmus, Muricidae, Turritella, Mytilus, Dendrostrea, Chalmys, Patinopecten, Euvola, Crasssadoma, Bryozoa, Echinoidea, and other uncatalogued specimens)	Unknown
Near the intersection of Superior Ave. and Pacific Coast Highway; Newport Beach	Terrace deposits	Horse (Equus), other unspecified mammals; Invertebrates: clam (Tivela, Donax, Lucinisca), scaphopod (Dentalum, Antalis), marine gastropods (Glossaulax, Chlorostoma)	Unknown (found during grading for parking lot construction)
On U.S. Route 101; west of the viaduct [bridge], a 1-mile exposure of fossiliferous beds	Palos Verdes Sand, bed 40–60 feet thick	Invertebrates (Yoldia, Tivela, Penitella, Petricola, Semele, Tellina, Leukoma, Glycymeris, Leptopecten, Lucinisca, Macoma, Dentalum, Paciocinebrina, Cryptomya, Cumingia, Donax, Nassarius, Callianax, Nutricola, Seila, Turritella, Gari, and others) Legless lizard (Anniella), tree frog (Hyla), gopher snake (Pituophis), garter snake (Thamnophis), kingsnake (Lampropeltis), ring-necked snake (Diadophis), garter snake (Thamnophis), long-nosed snake (Rhinocheilus), coachwhip (Masticophis), salamander (Enatina), slender salamander (Batrachoseps), skinks (Plestiodon), alligator lizard (Gerrhonotus), toad (Bufo), side-blotched lizard (Uta), spiny lizard (Sceloporus), climbing salamander (Aneides), turtle (Clemmys); quail (Callipepla), rail (Rallus); vole (Microtus), pocket gopher (Thomomys), shrew (Sorex), kangaroo rat (Dipodomys), cottontail rabbit (Sylvilagus), mole (Scapanus), harvest mouse (Reithrodontomys), deer mouse (Peromyscus), pack rat (Neotoma), chipmunk (Eutamias), bat (Chiroptera), Mammoth (Mammuthus), horse (Equus), bison (Bison); stickleback	Surface

Table 3.6-1 Closest known Fossil Localities

Location	Formation	Taxa	Depth
The Huntington Beach Urban Center Sand Borro Area, North of Pacific Coast Highway and West of Huntington Dr.	Unknown formation (Pleistocene sands)	(Gasterosteus), houndshark (Triakis); Land snails (Gastropoda)	Unknown
Near intersection of 19th St. and Anaheim Ave. in Costa Mesa	Unknown formation (Pleistocene)	Proboscidea	Unknown

Source: Appendix F.1

3.6.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to geology if it would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

   i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)

   ii) Strong seismic ground shaking.

   iii) Seismic-related ground failure, including liquefaction.

   iv) Landslides.

b) Result in substantial soil erosion or the loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

METHODOLOGY

Paleontological Resources

ECORP completed a thorough investigation of the potential for construction of the Fairview Developmental Center to result in direct impacts to paleontological resources. This investigation included a paleontological record search through the Natural History Museum of Los Angeles County (NHMLAC) and a desktop study of the geology and paleontology of the project site.

3.6.4 Project Impact Analysis

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

FAULT RUPTURE

An active fault, for the purposes of the Alquist-Priolo Act, is one that has ruptured in the last 11,000 years (DOC 2025b). Based on the California Geological Survey's Earthquake Zones of Required Investigation, no active faults or Alquist-Priolo fault zones traverse the city or project site (DOC 2025). The closest Alquist-Priolo earthquake fault zone is the Newport-Inglewood-Rose Canyon Fault Zone approximately 3.10 miles west of the project site. In addition, the Costa

Mesa General Plan determined that surface fault rupture would not be a significant hazard (Costa Mesa 2015). Therefore, there would be no impacts associated with fault rupture.

SEISMIC GROUND SHAKING

The project site, like most areas in California, is subject to ground movement associated with earthquakes along the active faults. Five regional major faults—the Newport-Inglewood, San Joaquin Hills, Whittier, San Andreas, and San Jacinto—present seismic hazards to the city (Costa Mesa 2025). The Newport-Inglewood fault is the closet to the project site, approximately one mile northwest (DOC 2025c). Due to the presence of active faults in the region, the project site would be subject to seismic ground shaking. However, the proposed project would be required to comply with the seismic design parameters of the CBC, which regulates all building and construction projects and implements a minimum standard for building design and construction that includes specific requirements for seismic safety and evacuation. Compliance with the CBC would ensure that impacts related to seismic shaking are less than significant.

LANDSLIDES

According to the US Land Slide Inventory and Susceptibility Mapper, the project site is not within an area of possible landslides; however, the southeast corner of the project site has a level 1 landslide susceptibility, which indicates a low potential for landslides (USGS 2025a). The proposed project would be designed and constructed consistent with the CBC, which would ensure that impacts related to landslide are less than significant.

LIQUEFACTION

According to the California Department of Conservation Liquefaction Zones Mapper, portions of the city are in liquefaction hazard zones, but the project site is not (Costa Mesa 2015). The nearest liquefaction zone is approximately 0.7 miles to the west (DOC 2025b). The proposed project would be designed and constructed to withstand liquefaction potential consistent with the CBC, which would ensure that no impact related to liquefaction would occur.

Based on the preceding analysis, the proposed project would have **less than significant** impacts related to seismic hazards.

Significance without Mitigation: Less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

The project site contains flat terrain and is situated on a gentle north-facing back slope; however, there are no steep slopes in the vicinity of the project site. Implementation of the proposed project would require extensive earthwork, which includes site clearing, excavation,

grading for site work, and utility trenching. Excavation and other ground-disturbing activities would expose more soils to erosion.

Erosion is a natural process of the movement of soil from place to place. The main natural agents of erosion in the region are flowing water and wind. Erosion can be accelerated dramatically by ground-disturbing activities if effective erosion control measures are not used. Soil can be carried off construction sites or bare land by wind and water, and tracked off construction sites by vehicles. The project applicant would be required to comply with the National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board, including submittal of a Notice of Intent and preparation of a Storm Water Pollution Prevention Plan (SWPPP), which will specify best management practices (BMPs) to minimize stormwater pollution from project construction, including erosion and sediment. The project construction contractor would implement the specified BMPs. At project completion, the project site would be developed with buildings, surface parking, recreational areas, walkways and other paved areas, and landscaping; thus, soil on-site would not be susceptible to substantial erosion. Therefore, the proposed project would not result in a substantial soil erosion or loss of topsoil, and a **less than significant impact** would occur.

Significance without Mitigation: Less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The project site is primarily flat and, as discussed above in Threshold 3.6(a), the project site is not within an area subject to landslides or liquefaction, and adherence with the CBC would ensure that impacts would be less than significant.

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer (Caltrans 2020). Due to the project site not being in an identified liquefaction susceptibility zone, there is no potential for lateral spreading. In addition, the proposed project would excavate and recompact the upper soils and any loose fill soils within the project site. Due to recompacting of the soil and the relatively low to moderate seismicity of the region, seismic settlement or lateral spreading would not occur.

The City of Costa Mesa and project site is within an area of land subsidence in California due to groundwater pumping (USGS 2025b). Thus, the project site would be subject to subsidence occurring throughout Orange County. The collapse of soils occurs with (1) an open, partially unstable, partially saturated fabric; (2) sufficient total stress to make the soil structure metastable; (3) the presence of a bonding agent or sufficient soil suction to stabilize the soil in the metastable condition; and (4) the addition of water, which reduces soil suction or

softens/destroys the bonding agent, causing shear failures at the inter-aggregate or inter-particle contacts (Caltrans 2024).

Groundwater beneath the project site is expected to be at a depth of over 50 and 100 feet bgs, and boring confirmed no groundwater was encountered at 15 bgs (Appendix F.1 and F.2). Thus, groundwater is an unlikely source of water for collapsible soils. The underlying soils at the project site contain poorly graded sands, silts, and to a lesser extent clays. The underlying soils are considered open (poorly graded), provided apparent cohesion from suction (silts), and a bonding agent (clay). In addition, since the soil at the project site has the potential to bond with water from an unknown source, the potential for collapse of soils is present.

Therefore, the potential of land subsidence and collapse of soils is present on-site. However, the proposed project would be required to adhere to the CBC which includes design provisions that would ensure the underlying geologic unit or soil remain stable, and impacts remain less than significant.

The proposed project would be designed and constructed to withstand landslide, liquefaction, lateral spreading, subsidence, liquefaction, or collapse potential. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils contain certain types of clay minerals that shrink when they dry out and swell when soils become wet, resulting in the potential for cracking building foundations and in some cases, structural distress of the buildings themselves.

Based on the web soil survey mapper, the underlying soil contains approximately 94.8 percent of Myford Sandy loam (172and 175), 4.2 percent of Cropley Clay (149), and one percent of Omni Clay (184). The soil plasticity index (PI) identifies the soil's ability to change shape, and a PI of 15 or greater (IBC Section 1803.5.3) is considered an expansive soil. The majority of the site contains Myford Sandy loam with a PI of 13.8; however, expansive soils exist on-site with the presence of Cropley Clay, and Omni Clay with PIs of 33 and 26, respectively. The effect of expansive soil is commonly and effectively reduced by various design techniques such as 1) proper design of foundations, slabs, streets, and other improvements subject to the influence of the soils; 2) overexcavation of the expansive soils/bedrock and replacement with less-expansive fill soils; 3) control of surface and subsurface drainages to prevent moisture variations; and 4) combinations of these various techniques (UFC 2004). In addition, the project would comply

with the seismic design parameters of the CBC, ensuring impacts associated with expansive soils are **less than significant**.

Significance without Mitigation: Less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The proposed project would not require the installation or use of a septic tank or alternative wastewater disposal system because sewer systems are available and accessible to the project site. Therefore, **no impact** would occur.

Significance without Mitigation: No Impact.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources or fossils are remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. This sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit. According to the Costa Mesa General Plan, a comprehensive paleontological assessment of Orange County in 1980 identified eight unique paleontological sites in the city (Costa Mesa 2015).

The project site was formerly developed with the Fairview Developmental Center. Based on the Paleontological Assessment the underlying soils contain deposits of late to middle Pleistocene which are known to appear anywhere from 8 to 10 feet in depth (Appendix E.1). The sensitivity for producing fossils may range from low (Holocene alluvium) to high (Pleistocene alluvium) based on depth. Although only shallow excavation for site preparation would occur it is possible that unknown paleontological resources could be discovered during earthwork.

Significance without Mitigation: Potentially significant.

Impact GEO-1: Construction of the proposed project could encounter unique paleontological resources during ground-disturbing activities.

Mitigation Measure GEO-1: Unanticipated Discovery of Paleontological Resources.

If paleontological resources (i.e., fossil remains) are discovered during excavation activities, the contractor will notify the City and cease excavation within 50 feet of the find until a qualified paleontological professional can provide an evaluation of the site.

The qualified paleontological professional will evaluate the significance of the find and recommend appropriate measures for the disposition of the site (e.g., fossil recovery, curation, data recovery, and/or monitoring). Construction activities may continue on other parts of the construction site while evaluation and treatment of the paleontological resource takes place.

Significance with Mitigation: Less than Significant. The proposed project would include earthmoving activities during the construction phase. Although unlikely, due to the previous history of development on site and urbanized nature of the area, unknown planetological resources may exist in underlying soils. Construction related activities may uncover and damage paleontological resources. Mitigation Measure GEO-1, would ensure a qualified paleontological professional is on site in the event fossil localities are discovered as to document, protect, and extract the locality to preserve and protect the locality form any further damages. The mitigation measure would endure preservation and protection of planetological resources in the event they are found, thereby reducing impacts to less than significant.

3.6.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to geological resources?

Geologic and paleontological impacts related to the proposed project would be specific to the project site and would not combine to result in cumulative impacts. As discussed previously, implementation of the proposed project would not result in significant impacts related to geology and soils, with mitigation incorporated. Although the project site would be subject to strong ground shaking, landslides, subsidence, and expansive soils at various levels of severity, mandatory compliance with federal, State and local regulation would ensure these impacts would be less than significant.

The identified cumulative development listed in Chapter 3, Table 3-2, would be subject to the same federal, State, and local regulations. Similarly, all development projects would also require site-specific geological and paleontological analysis that could lead to mitigation requiring monitoring and recovery, identification, and curation of any resources discovered. Since impacts associated with geology and soils are by their nature focused on specific sites or areas, the less-than-significant impacts within the project site would not contribute to a cumulative increase in hazards in the immediate vicinity of the project site.

Similarly, impacts to paleontological resources are considered site specific in nature, and site-specific mitigation measures, as with the proposed project, would ensure paleontological resources are preserved in accordance with federal, State, and local regulations. The proposed project's mitigation measure would reduce the potential for project-related activities to contribute to cumulative impacts to paleontological resources. Provided that site-specific

impacts are reduced to a less than significant level, no significant cumulative impacts are anticipated.

Impacts of the proposed project on geology and soils would not be cumulatively considerable after compliance with existing regulations and implementation of site-specific mitigation measures. Therefore, cumulative impacts associated with geology and soils would be **less than significant**.

Significance without Mitigation: Less than significant.

3.6.6 References

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3.7 GREENHOUSE GAS EMISSIONS

This section of the DEIR evaluates the potential greenhouse gas (GHG) emissions impacts associated with the implementation of the proposed Fairview Developmental Center Specific Plan (FDCSP or proposed project). Because no single project is large enough to result in a measurable increase in global concentrations of GHG, climate change impacts of a project are considered on a cumulative basis. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District's (South Coast AQMD) Working Group. Cumulative impacts related to GHG emissions are based on the regional boundaries of the South Coast Air Basin (SoCAB).

GHG emissions modeling was conducted using the California Emissions Estimator Model (CalEEMod), Version 2022.1, and model outputs are in Appendix B.1 of this DEIR. Transportation-sector impacts are based on trip generation and daily vehicle miles traveled (VMT), as provided by Fehr and Peers (Appendix J.2) and modeled using California Air Resources Board (CARB) EMFAC2025 (EMission FACtor model) v.2.1.0.

Notice of Preparation Comments

The City received one comment letter for the Notice of Preparation (NOP) regarding potential GHG emissions impacts. A letter from Costa Mesa First on December 5, 2025, recommends inclusion of project level mitigation measures to address potential health risks and GHG emissions as well as documented adherence to applicable green building standards.

Terminology

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide (CO_2) over a given period of time (20, 100, and 500 years). CO_2 has a GWP of 1.
- **Carbon dioxide-equivalent (CO_2e).** The standard unit to measure the amount of greenhouse gases in terms of the amount of CO_2 that would cause the same amount of warming. CO_2e is based on the GWP ratios between the various GHGs relative to CO_2.
- **$MTCO_2e$.** Metric ton of CO_2e.
- **$MMTCO_2e$.** Million metric tons of CO_2e.

Greenhouse Gases and Climate Change

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary

source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified 4 major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).[1,2]

The major GHGs applicable to the proposed project are briefly described.

- **Carbon dioxide (CO_2)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH_4)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.
- **Nitrous oxide (N_2O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 3.7-1, *GHG Emissions and Their Relative Global Warming Potential*. The GWP is used to convert GHGs to CO_2-equivalence (CO_2e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Fourth Assessment Report (AR4), GWP values for CH_4, 10 MT of CH_4 would be equivalent to 250 MT of CO_2.

[1] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals); however, water vapor is not considered a pollutant because it is considered part of the feedback loop rather than a primary cause of change.

[2] Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion (CARB 2022). However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

Table 3.7-1 GHG Emissions and Their Relative Global Warming Potential

GHGs	Fourth Assessment Report (AR4) GWP Relative to CO_2 [1]	Fifth Assessment Report (AR5) GWP Relative to CO_2 [1]	Sixth Assessment Report (AR6) GWP Relative to CO_2 [1]
Carbon Dioxide (CO_2)	1	1	1
Methane[2] (CH_4)	25	28	30
Nitrous Oxide (N_2O)	298	265	273

Source: IPCC 2007, 2013, and 2023.

Notes: GWP = global warming potential. The IPCC published updated GWP values in its Sixth Assessment Report (AR6) that reflect latest information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO_2. However, CalEEMod applies GWP values identified in AR4 for emissions quantification.

1. Based on 100 -year time horizon of the GWP of the air pollutant compared to CO_2.
2. The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO_2 is not included.

HUMAN INFLUENCE ON CLIMATE CHANGE

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the 20th century, however, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities.

The recent IPCC Sixth Assessment Report (AR6) summarizes the latest scientific consensus on climate change. It finds that atmospheric concentrations of CO_2 have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year. By the 2030s, and no later than 2040, the world will exceed 1.5°C warming (CARB 2022). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the Earth's temperature changed the distribution of species, availability of water, and other conditions. Human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by

varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in frequency of warm spells/heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

POTENTIAL CLIMATE CHANGE IMPACTS FOR CALIFORNIA

There is at least a greater than 50 percent likelihood that global warming will reach or exceed 1.5°C in the near-term, even for the very low GHG emissions scenario (IPCC 2022). Climate change is already impacting California and will continue to affect it for the foreseeable future. For example, the average temperature in most areas of California is already 1°F (~0.56°C) higher than historical levels, and some areas have seen average increases in excess of 2°F (~1.1°C) (CalOES 2020). The California Fourth Climate Change Assessment identifies the following climate change impacts under a business-as-usual scenario, in which no new actions are taken to curb GHG emissions:

- Annual average daily high temperatures in California are expected to rise by 2.7°F by 2040, 5.8°F by 2070, and 8.8°F by 2100 compared to observed and modeled historical conditions. These changes are statewide averages. Heat waves are projected to become longer, more intense, and more frequent.
- Warming temperatures are expected to increase soil moisture loss and lead to drier seasonal conditions. Summer dryness may become prolonged, with soil drying beginning earlier in the spring and lasting longer into the fall and winter rainy season.
- High heat increases the risk of death from cardiovascular, respiratory, cerebrovascular, and other diseases.
- Droughts are likely to become more frequent and persistent through 2100.[3]
- Climate change is projected to increase the strength of the most intense precipitation and storm events affecting California.

[3] Overall, California has become drier over time, with five of the eight years of severe to extreme drought between 2007 and 2016, and with unprecedented dry years in 2014 and 2015 (OEHHA 2018). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive four years from 2012 to 2015 (OEHHA 2018).

- Mountain ranges in California are already seeing a reduction in the percentage of precipitation falling as snow. Snowpack levels are projected to decline significantly by 2100 due to reduced snowfall and faster snowmelt.
- Marine layer clouds are projected to decrease, though more research is needed to better understand their sensitivity to climate change.
- Extreme wildfires (i.e., fires larger than 10,000 hectares or 24,710 acres) would occur 50 percent more frequently. The maximum area burned statewide may increase 178 percent by the end of the century.
- Exposure to wildfire smoke is linked to increased incidence of respiratory illness.
- Sea level rise is expected to continue to increase erosion of beaches, cliffs, and bluffs. (CalOES 2020)

Global climate change risks to California are shown in Table 3.7-2, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

Table 3.7-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Fewer extremely cold nights Poor air quality made worse Higher temperatures increase ground-level ozone levels
Water Resources Impacts	Decreasing Sierra Nevada snowpack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea level rise Increasing coastal floods Shrinking beaches Worsened impacts on infrastructure

Table 3.7-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pest and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: CEC 2006, 2009; CCCC 2012; CNRA 2014; CalOES 2020.

3.7.1 Regulatory Framework

This section describes the federal, State, regional, and local regulations applicable to GHG emissions.

FEDERAL

United States Environmental Protection Agency

The US Environmental Protection Agency (EPA) adopted the 2009 Greenhouse Gas Endangerment Finding stating that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. On February 12, 2026, in response to the Trump Administration's Executive Order (EO), "Unleashing American Energy," EPA rescinded the 2009 Greenhouse Gas Endangerment Finding. Therefore, GHG emissions are no longer regulated at the federal level.

Federal Fuel Economy and Fuel Standards

Information on Corporate Average Fuel Economy (CAFE) standards is provided in Section 3.5, *Energy*, of this DEIR.

STATE

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order (EO) S-03-05 and EO B-30-15, EO B-55-18, Assembly Bill (AB) 32, Senate Bill (SB) 32, AB 1279, and SB 375.

Executive Order S-03-05

EO S-03-05 was signed June 1, 2005, and set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

Assembly Bill 32, the Global Warming Solutions Act (2006)

AB 32 was passed by the California State legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in EO S-03-05. The CARB prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

Senate Bill 32 and Assembly Bill 197

In September 2016, the California Governor signed SB 32 and AB 197 into law, making the EO B-30-15 goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

Executive Order B-55-18

EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure future scoping plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279

On August 31, 2022, the California Legislature passed AB 1279, which requires California to achieve net-zero GHG emissions no later than 2045 and to achieve and maintain negative GHG emissions thereafter. Additionally, AB 1279 also establishes a GHG emissions reduction goal of 85 percent below 1990 levels by 2045. CARB will be required to update the scoping plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.

2022 Climate Change Scoping Plan

CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state's anthropogenic (human-caused) GHG emissions (CARB 2022). The Scoping Plan provides updates to the previously adopted 2017 Scoping Plan and addresses the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target as directed by AB 1279. Previous Scoping Plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. The 2022 Scoping Plan updates the target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time.

The path forward was informed by the recent Sixth Assessment Report (AR6) of the IPCC, and the measures would achieve 85 percent below 1990 levels by 2045 in accordance with AB 1279. CARB's 2022 Scoping Plan identifies strategies shown in Table 3.7-3, *Priority Strategies for Local Government Climate Action Plans*, which would be most impactful at the local level for ensuring substantial progress toward the State's carbon neutrality goals.

Table 3.7-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
Transportation Electrification	Convert local government fleets to zero-emission vehicles (ZEV) and provide EV charging at public sites.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans).
VMT Reduction	Reduce or eliminate minimum parking standards.
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking
	Implement parking pricing or transportation demand management pricing strategies.

Table 3.7-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing allowable density of the neighborhood).
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements)
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses.
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances.
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing).
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings).

Source: CARB 2022.

Based on Appendix D of the 2022 Scoping Plan, for residential and mixed-use development projects, CARB recommends first demonstrating that these land use development projects are aligned with State climate goals based on the attributes of land use development that reduce operational GHG emissions while advancing fair housing. Attributes that accommodate growth in a manner consistent with the GHG and equity goals of SB 32 have all the following attributes:

- Transportation Electrification
  - Provide electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code at the time of project approval.
- Vehicle Miles Traveled (VMT) Reduction
  - Locate projects on infill sites that are surrounded by existing urban uses and reuse or redevelop previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).

- The project does not result in the loss or conversion of the State's natural and working lands.
- The project consists of transit-supportive densities (minimum of 20 residential dwelling units/acre), or is in proximity to existing transit stops (within a half mile), or satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS).
- The project reduces parking requirements by:
  - Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or
  - Providing residential parking supply at a ratio of <1 parking space per dwelling unit; or
  - For multifamily residential development, require parking costs to be unbundled from costs to rent or own a residential unit.
- At least 20 percent of the units are affordable to lower-income residents.
- Result in no net loss of existing affordable units.

- Building Decarbonization
  - Uses all electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking. (CARB 2022)

The second approach to project-level alignment with State climate goals is net-zero GHG emissions, especially for new residential development. The third approach to demonstrating project-level alignment with State climate goals is to align with GHG thresholds of significance, which many local air quality management and air pollution control districts have developed or adopted (CARB 2022).

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target.

Update to the SB 375 Targets

Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology, and then released another update in February 2018, which became effective in October 2018 (CARB 2018). All sustainable communities strategies (SCS) adopted after October 1, 2018, are subject to these new targets. The SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks compared to 2005. This excludes reductions anticipated from implementation of state technology and fuels strategies and any potential future state strategies such as statewide road user pricing. The proposed targets call for greater per capita GHG emission reductions from SB 375 than are currently in place, which for 2035 translates into proposed targets that either match or exceed the emission reduction levels in an MPO's currently adopted SCS. CARB staff began the target update process in 2024 with a public workshop and plans to conclude it in 2026 with Board approval of the new targets (CARB 2026). At the time of drafting this DEIR, the updated targets have not yet been adopted by the CARB Board.

Additional GHG Sector-Specific Regulations

Table 3.7-4, *GHG Sector-Specific Regulations*, lists specific sector regulations that help reduce GHG emissions.

Table 3.7-4 GHG Sector-Specific Regulations

Sector	Regulations
Transportation	AB 1493, EO S-01-07, EO B-16-2012, EO N-79-20
Renewables Portfolio: Carbon Neutrality Regulations	SB 1078, SB 107, SB X1-2, EO S-14-08, SB 350, SB 100, SB 1020
Energy Efficiency	California Building Code: Building Energy Efficiency Standards, California Building Code: CALGreen, 2006 Appliance Efficiency Regulations
Solid Waste Diversion	AB 939, AB 341, AB 1327, AB 1826
Water Efficiency	SBX7-7, AB 1881
Short-Lived Climate Pollution Reduction Strategy	SB 1383

Source: Appendix B.1.

REGIONAL

SCAG's 2024-2050 RTP/SCS

SB 375 requires each MPO to prepare an SCS in its regional transportation plan (RTP/SCS). For the SCAG region, the 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050 by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together, and increasing investments in transit and complete streets (SCAG 2024).

LOCAL

City of Costa Mesa 2015-2035 General Plan

The 2015-2035 General Plan was adopted by the City Council in June 2016 (Costa Mesa 2016). Existing goals, policies, and programs aimed at reducing GHG emissions impacts are primarily found in the Conservation Element and Circulation Element.

City of Costa Mesa Climate Action & Adaptation Plan

The City of Costa Mesa is developing its Climate Action & Adaptation Plan (CAAP), a comprehensive roadmap to reduce GHG emissions from both community-wide and municipal sources (Costa Mesa 2026). The plan will establish GHG emission reduction targets and outline a pathway to align with California's statewide climate goals, including carbon neutrality by 2045.

City of Costa Mesa Municipal Code

The City's Municipal Code is organized by title, chapter, article, and section. The following regulations relate to GHG emissions impacts.

- **Title 5, Chapter I, Section 5-1, *Construction Codes Adopted*,** adopts the 2025 California Building Code and the 2025 California Energy Code.

- **Title 13, Chapter IX, Article 12, *Transportation Demand Management*,** complies with state law and Orange Country Transportation Authority requirements by implementing a local trip reduction and Transportation Demand Management (TDM) program to help reduce traffic congestion from certain development projects. Applicable development shall provide improvements, such as preferential parking for carpool vehicles, bicycle parking and shower facilities, information on transportation alternatives, rideshare vehicle loading areas, vanpool vehicle accessibility, bus stop improvements, employee locker rooms, and safe pedestrian circulation systems.
- **Title 13, Chapter VII, *Landscaping Standards*,** helps establish requirements and standards for the design, installation, water conservation, and maintenance of landscape and irrigation.
- **Title 5, Chapter X, *Small Residential Solar Energy System Permits*,** adopts an expedited, streamlined solar permitting process to achieve timely and cost-effective installations of small residential rooftop solar energy systems.
- **Title 5, Chapter XI, *Electric Vehicle Charging Station Permits*,** adopts an expedited streamlined permitting process to achieve timely and cost-effective installations of electric vehicle charging stations.
- **Title 10, Chapter XX, *Motor Vehicle Air Pollution Reduction*,** supports lowering GHG emissions by enabling the collection of motor vehicle registration fees and establishing a dedicated fund to help the City implement programs that reduce air pollution from motor vehicles.

3.7.2 Existing Conditions

CALIFORNIA'S GHG SOURCES AND RELATIVE CONTRIBUTION

In 2025, the statewide GHG emissions inventory was updated for 2000 to 2023 emissions using the GWPs in IPCC's AR4 and reported that California produced 360.4 $MMTCO_2e$ GHG emissions in 2023 (3.0 percent lower than 2022 levels). Since peak levels in 2004, California's GHG emissions have generally followed a decreasing trend. By 2014, statewide GHG emissions dropped below the 2020 GHG limit (AB 32 target for year 2020) and have remained below that limit ever since. Additionally, the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross state product) is declining (CARB 2025).

California's transportation sector remains the largest source of GHG emissions, producing 37.1 percent of the state's total emissions. Industrial sector emissions make up 18.6 percent, and electric power generation make up 15.9 percent of the state's emissions inventory. Other major sectors of GHG emissions include residential and commercial (12.0 percent), agriculture and forestry (8.1 percent), high GWP emissions (5.9 percent), and recycling and waste (2.4 percent).

Emissions from the transportation sector (e.g., on-road vehicles) have generally decreased since their peak in 2002, but this sector has experienced periods of growth and decline. A decrease through 2023 was primarily due to reductions from on-road sources, likely from an increased use in EVs and more fuel-efficient vehicles over that timeframe, and the subsequent decrease in the amount of fuel used. Electricity emissions also have decreased since the early 2000s due to the deployment of renewable and less carbon-intensive resources, leading to reduced dependence on fossil-fuel electricity generation. Emissions from the industrial sector decreased from 2022, largely due to the continued downward trend in oil and gas production (CARB 2025).

EXISTING PLAN AREA EMISSIONS

As described in Section 2.4.2, *Local Setting*, of this DEIR, the portion of the project site within the former FDC facility is currently developed with vacant buildings, paved areas, natural gas areas, trees, and ornamental landscaping. The portion surrounding Fair Drive consists of a three-lane alignment of Fair Drive between its intersection with N Shelley Circle and Harbor Boulevard. The current site generates minimal GHG emissions because the buildings are vacant and operations have ceased, resulting in little to no vehicle trips, building energy use, water use, solid waste generation, and refrigerant emissions. However, historically, the site did produce GHG emissions from these sources, including an on-site co-generation plant, which is being demolished as part of the FDC project.

3.7.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to greenhouse gas emissions if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

THRESHOLD GUIDANCE

South Coast AQMD has adopted a significance threshold of 10,000 $MTCO_2e$ per year for permitted (stationary) sources of GHG emissions for which South Coast AQMD is the designated lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, South Coast AQMD convened a GHG CEQA Significance Threshold Working Group. Based on the last Working Group meeting (Meeting No. 15) in September 2010, the South Coast AQMD Working Group identified a tiered approach for

evaluating GHG emissions for development projects where South Coast AQMD is not the lead agency (South Coast AQMD 2010a). This following tiered approach has not been formally adopted by South Coast AQMD.

- **Tier 1.** If a project is exempt from CEQA, project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (e.g., city or county), project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 3.** If GHG emissions are less than the screening-level criterion, project-level and contribution to significant cumulative GHG emissions are less than significant.

  For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, South Coast AQMD requires an assessment of GHG emissions. Project-related GHG emissions include on-road transportation, energy use, water use, wastewater generation, solid waste disposal, area sources, off-road emissions, and construction activities. The South Coast AQMD Working Group identified that because construction activities would result in a "one-time" net increase in GHG emissions, construction activities should be amortized into the operational phase GHG emissions inventory based on the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame, since this is a typical interval before a new building requires the first major renovation. South Coast AQMD identified a screening-level threshold of 3,000 $MTCO_2e$ annually for all land use types. The bright-line screening-level criteria are based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds. Therefore, projects that do not exceed the bright-line threshold would have a nominal, and therefore, less than cumulatively considerable impact on GHG emissions. South Coast AQMD recommends use of the 3,000 $MTCO_2e$ interim bright-line screening-level criterion for all project types (South Coast AQMD 2010b).
- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.[4] The South Coast AQMD Working Group has identified an efficiency target for projects that exceed the screening threshold of 4.8 $MTCO_2e$ per year per service population ($MTCO_2e$/year/SP) for project-level analyses and 6.6 $MTCO_2e$/year/SP for

[4] South Coast AQMD had identified an efficiency target for projects that exceed the bright-line threshold: a 2020 efficiency target of 4.8 $MTCO_2e$ per year per service population ($MTCO_2e$/year/SP) for project-level analyses and 6.6 $MTCO_2e$/year/SP for plan-level projects (e.g., general plans). Service population is generally defined as the sum of residential and employment population of a project. The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan (CARB 2008)

plan level projects (e.g., program-level projects such as general plans) for the year 2020.[5] The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.[6]

For purposes of this analysis, the bright-line threshold of 3,000 $MTCO_2e$/year is used to determine the proposed project's impacts.

Mass Emissions and Health Effects

On December 24, 2018, in *Sierra Club et al. v. County of Fresno et al.* (Friant Ranch), the California Supreme Court determined that the EIR for the proposed Friant Ranch project failed to adequately analyze the project's air quality impacts on human health. The EIR prepared for the project, which involved a master planned retirement community in Fresno County, showed that project-related mass emissions would exceed the San Joaquin Valley Air Pollution Control District's regional significance thresholds. In its findings, the California Supreme Court affirmed the holding of the Court of Appeal that EIRs for projects must not only identify impacts to human health, but also provide an "analysis of the correlation between the project's emissions and human health impacts" related to each criterion air pollutant that exceeds the regional significance thresholds or explain why it could not make such a connection. In general, the ruling focuses on the correlation of emissions of toxic air contaminants and criteria air pollutants and their impact to human health.

The effects of climate change are identified in Table 3.7-4. Though identified effects such as sea level rise and increased extreme weather can indirectly impact human health, CARB has not established ambient air quality standards for GHG emissions. The state's GHG reduction strategy outlines a path to avoid the most catastrophic effects of climate change, and the state's GHG reduction goals and strategies are based on the path to reducing statewide cumulative GHGs as outlined in AB 32, SB 32, and EO S-03-05.

Because no single project is large enough to result in a measurable increase in global concentration of GHG emissions, climate change impacts of a project are considered on a cumulative basis. Without federal ambient air quality standards for GHG emissions and given the cumulative nature of GHG emissions and the South Coast AQMD Working Group's significance thresholds, which are tied to reducing the state's cumulative GHG emissions, it is not feasible at this time to connect the project's specific GHG emissions to the potential health impacts of climate change.

[5] It should be noted that the Working Group also considered efficiency targets for 2035 for the first time in this Working Group meeting.

[6] South Coast AQMD took the 2020 statewide GHG reduction target for land use only GHG emissions sectors and divided it by the 2020 statewide employment for the land use sectors to derive a per capita GHG efficiency metric that coincides with the GHG reduction targets of AB 32 for year 2020.

METHODOLOGY

This GHG evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely in conjunction with implementation of the proposed project. The South Coast AQMD Working Group has published guidelines that are intended to provide local governments with guidance for analyzing and mitigating environmental impacts, and they were used in this analysis. The analysis in this section is based on buildout of the proposed project as modeled using CalEEMod, Version 2022.1.

Construction Phase

Implementation of the proposed project would generally occur over a period of up to 18 years, with full buildout of the proposed project in year 2045. However, because the proposed project is a broad-based policy plan, how development would ensue for the individual land uses accommodated under the FDCSP is unknown.

For purposes of project-related construction emissions, construction emissions were estimated based on a worst-case scenario that involves sitewide improvements across the entire 95-acre plan area, maximum building development phase across 13 acres of the project area (Phase 3), and construction of the secondary access roadway. The sitewide improvements across the entire 95-acre plan area, including demolition, site preparation, mass grading, and utility trenching, are assumed to commence in 2027. Demolition of all existing buildings and asphalt is assumed to take place during the first seven months. Mass grading and utility trenching are then conducted concurrently across the entire site over the following seven months. After sitewide improvements, it was assumed that construction of the maximum building development phase (Phase 3) and construction of the secondary access roadway would begin at the same time in 2028. For purposes of this assessment, Phase 3 consisted of 947 housing units constructed over 50 months (4.2 years). The CalEEMod default construction durations for construction activities (fine grading, building construction, paving, and architectural coating) were normalized based on a 50-month schedule. Construction of the secondary access roadway is assumed over approximately 40 workdays. For the purpose of this plan-level analysis, the mass grading phase is conservatively estimated to require up to 15,185 cubic yards of soil export for remediation purposes. Construction assumptions such as construction equipment mix and construction worker trips were based on CalEEMod defaults (refer to Table 3.2-9 in Section 3.2, *Air Quality*).

To estimate total construction emissions for full buildout, maximum building development phase (Phase 3) emissions were multiplied by the total number of phases (6). Annual construction emissions from sitewide improvements, estimated Phases 1 through 6, and secondary access roadway emissions were then combined and amortized over 30 years. These values were included in the emissions inventory to account for one-time GHG emissions from the construction phase of the proposed project (South Coast AQMD 2009).

Operational Phase

- **Transportation.** The primary source of mobile-source emissions is from the combustion of fuel (i.e., gasoline and diesel). Transportation emissions forecasts were modeled using emissions data with adjusted factors from CARB's EMFAC2025 v.2.1.0 web database. Model runs were based on daily VMT data provided by Fehr and Peers (see Appendix J.2) and calendar year 2025 (existing) and 2045 (forecast) emission rates. The VMT is based on the origin-destination methodology using the Orange County Transportation Analysis Model (OCTAM). Consistent with CARB's methodology within the Scoping Plan Measure Documentation Supplement, daily VMT was multiplied by 347 days per year to account for reduced traffic on weekends and holidays to determine annual emissions.
- **Area Sources.** Area sources generated from use of consumer products and cleaning supplies are based on CalEEMod default emission rates and the square footage of proposed buildings, asphalt, and non-asphalt areas.
- **Energy.** Building energy consumption estimates utilize the CalEEMod Version 2022.1 default energy (i.e., electricity and natural gas) rates for residential land uses, which are based on the CEC's 2019 Residential Appliance Saturation Survey (RASS). CalEEMod Version 2022.1 default energy rates for nonresidential land uses are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019 (CAPCOA 2022). Use of the CalEEMod default energy rates results in conservative estimates compared to the 2022 Building Energy Efficiency Standards because the energy intensity estimates compiled from the RASS utilize data from residences constructed from 1974 to 2015. It is anticipated that new buildings under the latest Building Energy Efficiency Standards will generally result in lower energy use.
- **Solid Waste Disposal.** Indirect GHG emissions from waste generation were based on the increase in population and employment. The per capita waste generation rate of 7.3 for residents and 9.5 for employees was used. Refer to Section 3.17, *Utilities and Service Systems*, for more details.
- **Water/Wastewater.** Estimated water use and wastewater generation are based on average day water demand estimates provided in the Water Supply Assessment prepared by West & Associates Engineering, Inc (refer to Table 2, *Developmental Water Demand*, in Appendix G.1). Water demand for the proposed project is estimated to be 765,968 gallons per day (gpd) or 279,578,320 gallons per year (gpy) based on 365 days per year.
- **Refrigerants.** GHG emissions from operation of building air conditioning and refrigeration equipment are based on CalEEMod default values based on land use type.

Life cycle emissions are not included in the GHG analysis, consistent with California Resources Agency directives.[7] Black carbon emissions are not included in the GHG analysis because CARB does not include this pollutant in the state's AB 32 inventory but treats this short-lived climate pollutant separately.[8]

3.7.4 Project Impact Analysis

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is by definition a cumulative environmental impact.

Implementation of the proposed project would result in a maximum of 4,000 housing units and 35,000 square feet of commercial space (refer to Table 2-3, *FDCSP Buildout,* in Chapter 2, *Project Description*). Because the project site currently contains vacant buildings with no active operations, the proposed project would result in a net increase of 20,038 daily vehicle trips (Appendix J.2). Furthermore, operation of the proposed project would result in an increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), and energy usage (i.e., natural gas and electricity).

South Coast AQMD does not have a significance threshold for construction emissions but recommends that construction emissions be amortized over a 30-year project lifetime and added to the project's operational emissions for comparison to the South Coast AQMD Working Group's screening-level threshold of 3,000 $MTCO_2e$ annually (South Coast AQMD 2009). To estimate total construction emissions for full buildout, maximum building development phase

[7] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (LCI 2008).

[8] Particulate matter emissions, which include black carbon, are analyzed in DEIR Section 3.2, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017).

(4,986 $MTCO_2e$) were multiplied by total number of phases (6), resulting in an estimated 29,916 $MTCO_2e$ for Phases 1 through 6. Site-wide improvements were estimated to generate 5,524 $MTCO_2e$, and construction of the secondary access roadway would generate approximately 96 $MTCO_2e$. Combined, these components total 35,536 $MTCO_2e$. This total was amortized over a 30-year period, resulting in an annualized construction emissions estimate of approximately 1,185 $MTCO_2e$.

Project emissions during operation combined with amortized construction-related emissions are shown in Table 3.7-5, *Project-Related GHG Emissions*.

Table 3.7-5 Project-Related GHG Emissions

Source	Proposed Project ($MTCO_2e$)
Mobile[1]	10,030
Area	882
Energy	4,471
Water[2]	386
Solid Waste[3]	4,169
Refrigerants	14
30-Year Construction Amortization[4]	1,185
Total Emissions	**21,136**
South Coast AQMD Bright Line Threshold	3,000
Exceeds South Coast AQMD Bright Line Threshold	Yes

Sources: CalEEMod Version 2022.1; Appendix B.1.

1. Mobile emissions estimates reflect calendar year 2045 conditions and were based on daily VMT provided by Fehr and Peers (Appendix J.1) and EMFAC2025 v2.1.0 web database with adjustment factors.
2. Annual water demand calculated based on average day water demand provided by West & Associates Engineering, Inc. Water Supply Assessment (WSA) Fairview Developmental Center Specific Plan (Appendix G.1).
3. Solid waste demand based on per capita waste generation rates for residents and employees (Refer to Section 3.17, *Utilities and Service Systems*).
4. Worst-case scenario construction emissions (site-wide improvements, secondary access roadway, estimated Phase 1-6 emissions) are amortized over a 30-year period (South Coast AQMD 2010b).

As noted above in Section 3.7.2, *Existing Conditions*, the project site is assumed to generate nominal GHG emissions because the existing FDC facility buildings are currently vacant. However, historically the project site generated GHG emissions associated with its former use for general acute care services, research, training, and administrative operations. Therefore, the estimate in this table provides a conservative analysis of the proposed project's impact on GHG emissions.

As shown in Table 3.7-6, GHG emissions from buildout and operation the proposed project would exceed South Coast AQMD Working Group's bright-line significance threshold. As a result, the proposed project's cumulative contribution to long-term GHG emissions in the State would be considered potentially significant.

Significance without Mitigation: Potentially significant.

Impact GHG-1: Operation of the proposed project would generate a cumulatively considerable increase in GHG emissions that would exceed the South Coast AQMD Working Group bright-line threshold.

Mitigation Measure GHG-1: Implement Mitigation Measure AIR-1 through AIR-3.

Significance with Mitigation: Significant and unavoidable. Implementation of Mitigation Measures for the project's long-term operational emissions would contribute to reducing project-related GHG emissions to the extent feasible. For example, requirements for installation of EV charging units and infrastructure under Mitigation Measure AIR-1 would support and encourage the use of EVs. Requirements under Mitigation Measure AIR-2 would contribute to reducing energy demand and use of appliances that minimize the generation of GHG emissions from area sources and from the energy sector. With respect to GHG emissions from the solid waste sector, compliance with the diversion and organic waste recycling requirements under AB 939, AB 341, and AB 1826, along with compliance with the City's waste and recyclable collection and disposal requirements under Chapter IV, Garbage, Rubbish and Weeds, of Title 8, Health and Sanitation, of the City's Municipal Code, would minimize emissions from residential and nonresidential land uses to the extent feasible. However, due to the planned growth associated with the proposed project, it is anticipated that the proposed project could still exceed the South Coast AQMD bright-line GHG emissions threshold. Therefore, Impact GHG-1 would remain significant and unavoidable.

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, SCAG's RTP/SCS, and the City's General Plan. A consistency analysis with these plans follows.

CARB 2022 Scoping Plan

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. However, new regulations adopted by the State agencies outlined in the

Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that would affect a local jurisdiction's emissions inventory from the top down.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, Renewable Energy Portfolio Standards (RPS), and triennial updates to the California building codes. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed project would comply with these GHG emissions reduction measures since they are statewide strategies. The proposed project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Lastly, the proposed project includes an affordable housing component, which supports the CARB Scoping Plan's priorities for compact, infill development patterns that reduce VMT, lower transportation-related GHG emissions, and promote equitable access to jobs and transit. Overall, development of the proposed project would not obstruct implementation nor be inconsistent with the CARB Scoping Plan. Therefore, impacts would be less than significant.

SCAG's Regional Transportation Plan / Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for the Southern California region that details the development, integrated management, and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecast development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024). In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements.

As demonstrated in Section 3.10, *Land Use and Planning*, the proposed project would support and be consistent with the Connect SoCal goals (refer to Table 3.10-1, *Proposed Project Consistency Analysis with Connect SoCal 2024 Goals*). The proposed mixed-use development would redevelop an underutilized site and promote active transportation, resulting in a beneficial impact on VMT per service population in the City. Specifically, the proposed project would include new on-site bicycle and pedestrian facilities to promote multimodal travel, implement transportation demand management (TDM) strategies to reduce single-occupancy vehicle trips, and coordinate with the Orange County Transportation Authority (OCTA) to support and enhance transit ridership (refer to Table 3.15-3, *Proposed Project Consistency with*

Costa Mesa's Circulation Element Goals and Policies). Therefore, the proposed project would not conflict with or interfere with SCAG's ability to implement the regional strategies in 2024-2050 RTP/SCS, and impacts would be less than significant.

General Plan Consistency

As described in Table 3.10-1, *Consistency with General Plan Goals and Policies*, the proposed project would incorporate sustainable land use, support multimodal transportation infrastructure, and be constructed to the latest Building Energy Efficiency Standards. These project features are expected to help reduce GHG emissions by encouraging walking, biking, and shorter vehicle trips, and improving energy efficiency in the proposed buildings. Therefore, the proposed project would align with the primary objectives of City's General Plan goals and policies. This impact would be less than significant.

Summary

The proposed project would include project features which directly support the regional strategies outlined in the CARB's Scoping Plan, SCAG's 2024-2050 RTP/SCS, and the City's General Plan. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.7.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to greenhouse gas emissions?

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts under GHG Emissions Impact a) and b) are not project-specific impacts to global warming, but are the proposed project's contribution to this cumulative impact.

As discussed under Impact GHG-1, implementation of the proposed project would result in annual emissions that would exceed South Coast AQMD's bright-line threshold. Therefore, project-related GHG emissions and their contribution to global climate change would be cumulatively considerable.

However, as discussed under Impact GHG-2, the proposed project would support the regional strategies outlined in the CARB's Scoping Plan, SCAG's 2024-2050 RTP/SCS, and the City's General Plan. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for purpose of reducing GHG emissions.

Accordingly, because the proposed project's contribution to cumulative GHG emissions would be cumulatively considerable under Impact GHG-1, GHG impacts would remain **significant**.

Impact GHG-2: The proposed project, together with cumulative projects, would result in substantial GHG emissions impacts.

Mitigation Measures: Implement Mitigation Measures AIR-1 through AIR-3.

Significance with Mitigation: Significant and unavoidable. While Mitigation Measures AIR-1 through AIR-3 would require the implementation of measures that minimize the generation of GHG emissions from area sources and from the energy sector, the extent of development associated with the proposed project would continue to exceed the South Coast AQMD bright-line GHG emissions threshold, resulting in significant and unavoidable impacts with respect to GHG emissions. As such, impacts would be cumulatively considerable.

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3.8 HAZARDS AND HAZARDOUS MATERIALS

This section of the DEIR evaluates the potential impacts of the Fairview Developmental Center Specific Plan (FDCSP or proposed project) on human health and the environment due to exposure to hazardous materials or conditions associated with the project site, project construction, and project operations. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary. The analysis in this section is based, in part, upon the following source(s):

- *Phase I Environmental Site Assessment*, Avocet Environmental Inc., April 2020 (DEIR Appendix F.1)
- *Phase II Investigation Report*, Avocet Environmental Inc., July 2021 (DEIR Appendix F.2)

Complete copies of these studies are included in the technical appendices to this DEIR, Appendix F.1 and Appendix F.2, respectively.

The Phase I and Phase II Environmental Site Assessments (ESAs) evaluated an approximately 150-acre area, which included the entirety of the former Fairview Developmental Center (FDC) property (including the 95-acre project site, 15-acre Southern Regional Emergency Operations Center [SREOC] located southwest of the project site, Mark Lane housing, and former Plant Operations center on Merrimac Way), and the Harbor Village Apartments located northeast of the project site. The project site where the FDCSP would be implemented does not include the SREOC, Mark Lane housing, former Plan Operations center, or Harbor Village Apartments. For the purposes of this section, "FDC boundary" will be used to refer to the original area analyzed in the ESAs. Information from the ESAs identifying hazardous sites within the FDC boundary is provided for informational purposes only and is not considered part of the proposed project's impacts, except where relevant to the analysis of cumulative impacts.

Terminology

- **Recognized Environmental Condition (REC).** Refer to the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to environmental release, indicative release conditions, or material threat of future release. De minimis conditions are not RECs.

- **Historical REC (HREC).** Refer to past release of any hazardous substances or petroleum products related to the property that have been addressed to the satisfaction of the applicable regulatory authority or that meet unrestricted use criteria established by a regulatory authority without subjecting the property to any required controls.

- **Other environmental features (OEF).** Are environmental conditions that do not meet the REC or HREC definition but may be relevant for repurposing or divesting the property for redevelopment.

Notice of Preparation Comments

The City received a letter from the Department of Toxic Substances Control on November 5, 2025, for the Notice of Preparation (NOP). The comment letter raises concern about the history and future treatment of hazardous materials present at the project site. The relevant hazardous materials issues raised in this comment letter are addressed in this section. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the comment letters.

3.8.1 Regulatory Framework

FEDERAL

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 (42 US Code sec. 6901 et seq.) is the principal federal law regulating waste generation, management, and transportation. Hazardous waste management includes storage creating, storing, or disposal of hazardous waste. RCRA gave the US Environmental Protection Agency (EPA) the authority to control hazardous waste from "cradle to grave"— from generation to transportation, treatment, storage, and disposal—at active and future facilities. It does not address abandoned or historical sites. RCRA also set up a framework for managing non-hazardous wastes. Later amendments required phasing out land disposal of hazardous waste and added underground tanks storing petroleum and other hazardous substances.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) protects water, air, and soil resources from the risks created by past chemical disposal practices. This law is also called the Superfund Act and regulates sites on the National Priority List (NPL), which are called Superfund sites. The act was intended to prevent and respond to uncontrolled hazardous substances releases. It provides mechanisms for reacting to emergencies and chronic hazardous material releases. In addition to procedures to prevent and remedy problems, it established a system for compensating appropriate individuals and assigning appropriate liability. It is designed to plan for and respond to failure in other regulatory programs and remedy problems resulting from actions taken before the era of comprehensive regulatory protection.

Emergency Planning and Community Right-to-Know Act

Title III of the Superfund Amendments and Reauthorization Act (SARA) authorized the Emergency Planning and Community Right-to-Know Act (EPCRA) (42 US Code sec. 11001 et seq.) to inform communities and citizens of chemical hazards in their areas. It requires businesses to report: the locations and quantities of chemicals stored on-site to State and local agencies; releases to the environment of more than six hundred designated toxic chemicals; off-site transfers of waste; pollution prevention measures and activities; and to participate in chemical recycling. EPA maintains and publishes an online, publicly available, national database of toxic chemical releases and other waste management activities by specific industry groups and federal facilities—the Toxics Release Inventory.

To implement EPCRA, each state appoints a state emergency response commission to coordinate planning and implementation activities associated with hazardous materials. The commissions divide their states into emergency planning districts and name each district's local emergency planning committee. The federal EPCRA program is implemented and administered in California by the Governor's Office of Emergency Services, a state commission, six district committees, and 81 Certified Unified Program Agencies (CUPA). The Office of Emergency Services coordinates and provides staff support for the commission and district committees.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 allows the EPA to require reporting, record-keeping, testing requirements, and restrictions related to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. Title IV of the TSCA directs the EPA to regulate lead-based paint hazards.

TSCA's sections 402/404 require those engaged in lead abatements, risk assessments, and inspections in homes or child-occupied facilities before 1978 (such as in daycare centers and kindergartens) to be trained and certified in specific practices to ensure accuracy and safety. TSCA Section 403, Residential Hazard Standards for Lead in Paint, Dust, and Soil, sets standards for dangerous lead levels in paint, household dust, and residential soil.

Hazardous Materials Transportation Act

The United States Department of Transportation (DOT) regulates hazardous materials transportation to reduce risks to life and property from hazards associated with the transport of hazardous materials under Title 49 of the Code of Federal Regulations, which reflects laws passed by Congress as of January 2, 2006, last amended April 15, 2022. State agencies responsible for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation. These agencies also govern permitting for hazardous materials transportation.

Asbestos-Containing Materials Regulations

In conjunction with the EPA and California Occupational Safety and Health Administration (Cal/OSHA), state-level agencies regulate removal, abatement, and transport procedures for asbestos-containing materials. These regulations prohibit asbestos releases from industrial, demolition, or construction activities, and medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. The regulations include warnings and practices needed to reduce the risk of asbestos emissions and exposure. For example, 8 CCR Section 1529 provides for exposure limits, exposure monitoring, respiratory protection, and good working practices for workers exposed to asbestos. Finally, federal, state and local agencies must be notified before the onset of demolition or construction activities with the potential to release asbestos.

Polychlorinated Biphenyls Regulations

The EPA prohibited the use of PCBs in most of the new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The provisions of the TSCA regulate the inclusion of PCBs in electrical equipment and the handling of PCBs. Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline safety procedures for their disposal. The state likewise considers PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste and regulates them; accordingly, these regulations require that such materials be treated, transported, and disposed of as hazardous waste. At lower concentrations for nonliquids, regional water quality control boards may exercise discretion over classifying such wastes.

STATE

Cortese List

The Cortese List is a planning document used by the State, local agencies, and developers to comply with the California Environmental Quality Act requirements. The Cortese List provides information about the location of hazardous materials release sites, public drinking water wells that contain detectable levels of contamination, underground storage tanks with unauthorized releases, solid waste disposal facilities from which there is migration of hazardous wastes, and all cease and desist and cleanup and abatement orders. Government Code section 65962.5 requires the Secretary of the California Environmental Protection Agency to receive annual updates for the Cortese List. The Department of Toxic Substances Control (DTSC) is responsible for compiling and updating some of the information contained on the Cortese List, as well as other State and local government agencies. While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements (CalEPA 2026):

1. **List of Hazardous Waste and Substances sites** from Department of Toxic Substance Control's (DTSC's) EnviroStor database (Health and Safety Codes 25220, 25242, 25356, and 116395);
2. **List of Leaking Underground Storage Tank (LUST) Sites** from the SWRCB's GeoTracker database (Health and Safety Code 25295);
3. **List of solid waste disposal sites** identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273 subdivision (e) and California Code of Regulations Title 14 Section 18051));
4. **List of "active" Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO)** from the SWRCB (Water Code Sections 13301 and 13304); and
5. **List of hazardous waste facilities** subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

DTSC's Brownfields and Environmental Restoration Program (Cleanup Program) EnviroStor database provides DTSC's component of Cortese List data by identifying Annual Workplan (now referred to State Response and/or Federal Superfund), and Backlog sites listed under Health and Safety Code section 25356. In addition, DTSC's Cortese List includes Certified Operation and Maintenance sites. What follows is the DTSC Cleanup Program information that is required to be included in DTSC's component of the Cortese List. This information is sorted by site name, and by clicking on the site name you will be linked to the profile report for that particular site (DTSC 2026). All sites found within the project site are noted in Table 3.8-1, *Hazardous Materials Listings*, below.

Table 3.8-1 Hazardous Materials Listings

Site	Type of Site Listed	Status
GeoTracker		
Fairview Developmental Center 2501 Harbor Costa Mesa, CA 92626	LUST Cleanup Site	Completed – Case Closed as of 5/24/1993
Harbor Fair Exxon 2502 Harbor Costa Mesa, CA 92626	LUST Cleanup Site	Completed – Case Closed as of 6/25/2014
EnviroStor		
1x Fairview State Hospital 2501 Harbor Blvd Costa Mesa, CA 926260000	Hazardous Waste Facility	Closed

Sources: DTSC 2025; SWRCB 2025.

California Health and Safety Code and Code of Regulations

California Health and Safety Code Chapter 6.95 and California Code of Regulations, Title 19, Section 2729 set out the minimum requirements for business emergency plans and chemical inventory reporting. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous chemical inventory disclosing hazardous materials stored, used, or handled on-site.

Tanner Act (Assembly Bill 2948)

Although numerous state policies deal with hazardous waste, the most comprehensive is the Tanner Act (Assembly Bill 2948), which was adopted in 1986. The Tanner Act governs the preparation of hazardous waste management plans and the siting of hazardous waste facilities in California. To be in compliance with the Tanner Act, local or regional hazardous waste management plans need to include provisions that define: 1) the planning process for waste management, 2) the permit process for new and expanded facilities, and 3) the appeals process to the state available for certain local decisions.

California Code of Regulations, Title 22, Division 4.5

Title 22, Division 4.5, of the California Code of Regulations (CCR) sets forth the requirements for hazardous waste generators; transporters; and owners or operators of treatment, storage, or disposal facilities. These regulations include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste before shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste. These regulations specify the requirements for transporting loads of hazardous waste, including manifesting, vehicle registration, and accidental emergency discharges during transportation.

State Hazardous Waste Management Programs

Uniform Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Program administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include Hazardous Materials Release Response Plans and Inventories (business plans), the California Accidental Release Prevention (CalARP) Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented at the local government level by Certified Unified Program Agencies (CUPA).

Hazardous Materials Release Notification

Many State statutes require emergency notification of a hazardous chemical release:

- Health and Safety Code, Sections 25270.8 and 25507
- Vehicle Code, Section 23112.5
- Public Utilities Code, Section 7673 (PUC General Orders #22-B, 161)
- Government Code, Sections 51018, 8670.25.5(a)
- Water Code, Sections 13271, 13272
- Labor Code, Section 6409.1 (b)10

Requirements for immediate notification of all significant spills or threatened releases cover owners, operators, persons in charge, and employers. Notification is required regarding significant releases from facilities, vehicles, vessels, pipelines, and railroads. In addition, all releases that result in injuries or harmful exposure to workers must be immediately reported to the California Occupational Safety and Health Administration (Cal/OSHA) pursuant to the California Labor Code Section 6409.1(b).

California Accidental Release Prevention Program

CalARP became effective on January 1, 1997, in response to Senate Bill 1889 (Chapter 715, Statutes of 1996). CalARP aims to be proactive and therefore requires businesses to prepare risk management plans, that is, detailed engineering analyses of the potential accident factors at a business and mitigation measures to reduce this accident potential. The requirement for a risk management plan is coupled with the requirement for a hazardous materials business plan under the Unified Program, implemented by the CUPA.

Hazardous Materials Disclosure Programs

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include Hazardous Materials Release Response Plans and Inventories (business plans), the California Accidental Release Prevention Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented at the local government level by CUPAs. For the City of Costa Mesa, the Orange County CUPA managed by the Orange County Health Care Agency (OCHCA) is responsible for overseeing hazardous materials management and environmental protection programs for local businesses and facilities, handling everything from storage tanks to emergency response plans in conjunction with state rules.

Underground Storage Tank Program

The purpose of the UST Program is to protect people and the environment from releases of petroleum and other hazardous substances from tanks. The statutes govern the UST Program in the Solid Waste Disposal Act (1965). Because of the localized nature of USTs, the EPA shifts enforcement and oversight authority to local governments. California laws and regulations authorize the State Water Board to implement the UST program. The State Water Board then delegates the field implementation to CUPAs.

Lead Regulations

Cal/OSHA's "Lead in Construction Standard" is contained in 8 CCR Section 1532.1. This section applies to all construction work where an employee may be exposed to lead. The regulations address these areas: permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

Airport-Related Hazards

State Aeronautics Act

Airport authorities and other agencies regulate aircraft activity. The State Aeronautics Act (Public Utilities Code Section 21001 et seq.) is implemented by Caltrans's Division of Aeronautics. Key purposes of the act include to 1) foster and promote safety in aeronautics; 2) ensure that state laws and regulations relating to aeronautics are consistent with federal aeronautics laws and regulations; and 3) ensure that persons residing within the vicinity of airports are protected against intrusions by unreasonable levels of aircraft noise.

The State Aeronautics Act also establishes statewide requirements for airport land use compatibility plans (ALUCP), usually prepared by airport land use commissions. These plans are intended to provide for the orderly growth of a public airport and the area surrounding the airport while safeguarding the general welfare of inhabitants near the airport and the public in general.

Air Safety Zones

The California ALUC Planning Handbook provides planning guidance to ALUCs and counties and cities with jurisdiction over airport area land uses. This handbook allows jurisdictions flexibility in determining air safety zones that represent areas of assumed accident potential.

California Fire Code

The California Fire Code is contained in 24 CCR Part 9. The Code is updated every three years and includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, fire hydrant locations and distribution, and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

REGIONAL

Orange County Fire Authority Combustible Soil Gas Hazard Mitigation

The County of Orange has a Combustible Soil Gas Hazard Mitigation Policy, Guideline C-03, that applies to construction and occupancy of buildings on sites within proximity of methane producing sites, including oil and gas wells. The policy is applicable to any location where a building is proposed within 100 feet of an administrative oil/gas field boundary, within 100 feet of any active or abandoned oil/gas well, 300 feet from any gas seepage zone, or within 1,000 feet of the refuse footprint of any existing or new landfill site (OCFA 2017). As noted in Section 3.8.2, Existing Conditions, there are three geophysical prospect borings on the project site, which showed no evidence of oil or gas production. However, abandoned wells and exploratory borings may leak methane gas.

Orange County Hazardous Materials Business Emergency Plan

California requires all Certified Unified Program Agencies (CUPA), Participating Agencies (PAs), and regulated businesses to submit electronic forms. Businesses have direct access to their Business Emergency Plans and Chemical Inventories through the California Environmental Reporting System (CERS), which grants local fire agencies immediate access to chemical inventories in case of spills, fires, or other incidents. These programs also satisfy federal community right-to-know laws. The Hazardous Materials Business Emergency Plan (HMBEP) program requires businesses handling hazardous materials or extremely hazardous substances to submit an HMBEP in CERS. The Orange County CUPA, OCHCA, verifies business information and provides it to agencies responsible for public health and safety and the environment (OCHCA 2025a).

South Coast Air Quality Management District (South Coast AQMD)

South Coast AQMD Rule 1403 governs the demolition of buildings containing asbestos materials, requiring specific work practices designed to prevent the release of these asbestos-containing materials (ACMs). These regulations mandate thorough asbestos surveys, notification procedures, controlled removal methods, defined work schedules, and proper handling, storage, and disposal of ACM to ensure that demolition and renovation activities do not emit hazardous fibers or dust in the environment.

LOCAL

City of Costa Mesa General Plan

The Safety Element of the City of Costa Mesa General Plan identifies policies about hazards and hazardous materials, and the following policies apply to the proposed project.

- **Policy S-2.4.** Provide a high level of police and fire service in the community. Secure adequate facilities, equipment, and personnel for police and fire.
- **Policy S-2.5.** Consult with neighboring jurisdictions and partner agencies to respond appropriately to emergencies and incidents in all parts of the City.
- **Policy S-2.6.** Require that water supply systems for development are adequate to combat structural fires in terms of location and minimum required fire-flow pressures.
- **Policy S-2.7.** Require development to contribute its fair share toward funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.
- **Policy S-2.9.** Emphasize prevention and awareness of fire safety guidelines to minimize risk and potential damage to life, property, and the environment. In areas designated by the Costa Mesa Fire Department as having a high fire hazard, ensure adequate fire equipment, personnel, firebreaks, facilities, water, and access for a quick and efficient response in any area.
- **Policy S-2.10.** Maintain staff and facilities that will continue to support a coordinated and effective response to emergencies and natural disasters throughout the City.
- **Policy S-2.13.** Continue to consult with the County of Orange in the implementation of the Orange County Hazardous Waste Management Plan.
- **Policy S-2.14.** Ensure that appropriate in-depth environmental analysis is conducted for any proposed hazardous waste materials treatment, transfer, and/or disposal facility.
- **Policy S-2.15.** Continue to consult with the County of Orange to identify and inventory all users of hazardous materials and all hazardous waste generators, and prepare clean-up action plans for identified disposal sites.
- **Policy S-2.16.** Require the safe production, transportation, handling, use, and disposal of hazardous materials that may cause air, water, or soil contamination.
- **Policy S-2.17.** Encourage best practices in hazardous waste management, and ensure consistency with City, County, and federal guidelines, standards, and requirements.

- **Policy S-2.18.** Consult with federal, State, and local agencies and law enforcement to prevent the illegal transportation and disposal of hazardous waste.

City of Costa Mesa Emergency Management

The Office of Emergency Management (OEM) in the City of Costa Mesa is dedicated to safeguarding life, property, and the environment through the development and management of programs aimed at preventing, preparing for, responding to, recovering from, and mitigating both natural and man-made disasters. Recognizing that emergencies can occur at any time, the OEM works in conjunction with First Responders such as fire and police, to provide immediate assistance. The types of emergencies that may arise include earthquakes, fires, and floods, which can lead to significant loss of life and property without warning. Citizens are encouraged to be prepared for such events, as they may need to evacuate or stay confined to their homes. The City of Costa Mesa emphasizes collaboration with regional emergency management partners and the community to enhance resiliency and improve overall preparedness for emergencies (Costa Mesa 2025a).

City of Costa Mesa Emergency Operations Plan

The Emergency Operations Plan (EOP) outlines the City's strategies for emergency planning, organization, and response policies, having been last adopted in 2013. The EOP includes inter-agency coordination with governmental agencies, special districts, and non-governmental organizations involved in emergency management. The EOP serves as a preparatory guide that must be understood and exercised prior to emergencies, ensuring flexibility for various situations to aid in response and recovery. The EOP aligns with the California Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS), fulfilling legal requirements for managing multi-agency emergencies. Key components include strategies for disaster response, a hazard analysis, and a probability matrix, alongside departmental responsibilities and the development of Standard Operating Procedures (SOPs) for effective emergency operations.

City of Costa Mesa Local Hazard Mitigation Plan

The Costa Mesa Local Hazard Mitigation Plan (LHMP) provides a comprehensive assessment of the threats that the City faces from natural and human-caused hazard events and then coordinates strategy to reduce these threats. The LHMP identifies resources and information to help community members, City staff, and local officials understand local threats and make informed decisions. The LHMP can also support increased coordination and collaboration between the City, other public agencies, local employers, service providers, community members, and other key stakeholders (Costa Mesa 2022).

3.8.2 Existing Conditions

HISTORICAL LAND USE

Construction of the FDC began in the mid-1950s, and what was then Fairview State Hospital officially opened in 1959 as a state-operated residential facility providing general care, skilled nursing care, intermediate care, and acute crises services to individuals with intellectual and developmental disabilities. Original facility infrastructure in the Main Campus included dormitory, education, recreation, and administration buildings. These buildings were encircled by Shelley Circle and surrounded the main kitchen/warehouse building and the Central Power Plant. There were also remote operation and maintenance buildings and other support facilities located to the north of Shelley Circle that are now surrounded by the Harbor Village Apartments (Appendix F.1).

HAZARDOUS MATERIALS

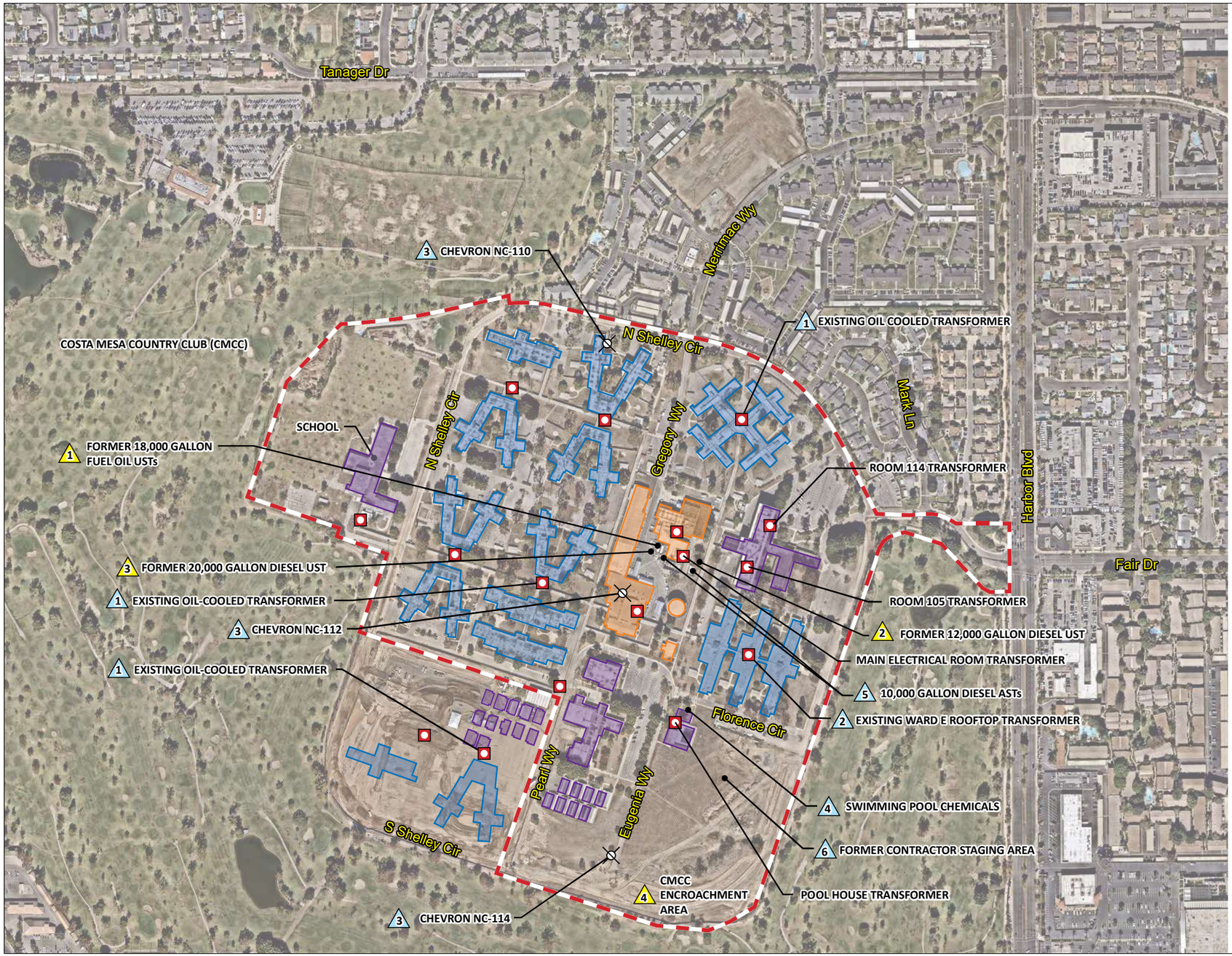
Phase I Environmental Site Assessment

The primary purpose of the Phase I Environmental Site Assessment (ESA) is to document and evaluate the history and current condition of a site in the context of the use, storage, handling, and disposal of potentially hazardous substances that could impact the subsurface environment or that may pose other human health risks. A Phase I ESA for the project site is in Appendix F.1.

The Phase I ESA identified one REC, four HRECs, and seven OEFs on the project site. The Phase I ESA presents the findings and conclusions for the project site in terms of identified and consecutively numbered RECs, HRECs, and OEFs. Figure 3.8-1, *REC, HREC, and OEF Locations*, shows the locations of the identified RECs, HRECs, and OEFs.

Recognized Environmental Conditions

- **REC: Polychlorinated Biphenyls (PCB) Releases in Electrical Vaults.** Transformers and other electrical equipment known to have contained PCBs were installed aboveground and subsurface vaults located throughout the project site. Based on the potential for PCB-containing oil to have leaked from the original electrical equipment and potentially impacted the concrete vaults and the underlying soil, all of the electrical vaults are considered RECs until confirmation sampling is demonstrated.



Source: Nearmap 2025; AVOCET Environmental 2020.

Figure 3.8-1
REC, HREC, and OEF Locations

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Historic Recognized Environmental Conditions

- **HREC 1: Former 18,0000-Gallon Fuel Oil USTs.** Two 18,000-gallon USTs were installed in 1955 to store backup fuel for natural gas-fired boilers in the Central Power Plant. The steel USTs were removed in 1992 and replaced with a 20,000-gallon diesel UST. Upon removal, the USTs appeared in good condition, but impacted soil was encountered beneath the utility trench. Orange County Health Care Agency (OCHCA) approved cleanup was conducted, and the soil impacts were removed through two cycles of excavation and soil sampling. On May 25, 1993, OCHCA issued a No Further Action (NFA) letter confirming the completion of corrective action, making the former 18,000-gallon fuel oil USTs an HREC.
- **HREC 2: Former 12,000-Gallon Diesel UST.** In 1975, the project site installed a 12,000-gallon UST for diesel fuel in the Central Power Plant's emergency electrical generator system. In June 1999, the UST was permanently closed, with OCHCA oversight. Diesel-impacted soil was observed around a riser and remote fill port. Approximately 50 tons of stained soil were segregated and transported off-site for disposal. OCHCA requested additional assessment due to elevated concentrations of TPH in the confirmation soil samples. In July 2000, three borings to 50 feet were taken to analyze soil matrix samples for TPH and fuel-related VOCs. A 15-foot sample from one of the borings contained 10,000 milligrams per kilogram (mg/kg) of TPH as diesel (TPH-d), but other concentrations were below reporting limits. OCHCA issued an NFA letter for the 12,000-gallon diesel UST and associated piping systems on December 11, 2000, due to the highly localized residual TPH-d impact and the unlikely impact on groundwater. Based on OCHCA's letter, the former 12,000-gallon diesel UST is considered an HREC for Phase I ESA purposes. However, the FDC’s previous investigations did not cover the potential of VOCs in soil vapor, which remains an area of concern.

- **HREC 3: Former 20,000-Gallon Diesel UST.** The double-walled 20,000-gallon diesel UST that was installed in 1992 to replace the original 18,000-gallon fuel oil USTs (HREC 8) for Central Power Plant boilers was removed in January 2005 and was reportedly in good condition. Three of the four confirmation soil samples from the tank excavation showed no detectable concentrations of TPH, BTEX, MTBE, or other fuel oxygenates. One sample contained 108mg/kg of total petroleum hydrocarbons as oil (TPH-o) but this was not considered indicative of a release. OCHCA issued an NFA letter for the 20,000-gallon diesel UST on July 11, 2005, deeming it an HREC for Phase I ESA purposes. However, FDC's previous investigations did not address the possible presence of VOCs in soil vapor.

- **HREC 4: Soil Impacts in Costa Mesa Country Club (CMCC) Encroachment Area.** CMCC's equipment and vehicle maintenance activities led to near-surface soil impacts involving petroleum hydrocarbons at the southern boundary of the project site. After multiple investigations and remedial excavation, OCHCA issued a letter stating that the residual contaminants do not pose a significant threat to groundwater. Based on the rationale in the letter, an NFA was issued on December 31, 2018. The remediated soil impacts in the CMCC

encroachment area are considered an HREC for Phase I ESA purposes; however, CMCC's investigations did not address the presence of VOCs in soil vapor.

Other Environmental Features

- **OEF: Asbestos-Containing Material (ACM), Lead-Based Paint and Coatings (LBP), and Universal Wastes**. Consistent with being built in the late 1950s, ACMs have been documented in certain buildings at the project site, including thermal system insulation in the Central Power Plant, and ACMs are likely present in materials such as vinyl floor tile and mastic and roofing materials. LBPs are likely present throughout the buildings. Universal wastes, such as refrigerants in chillers and air conditioning units, batteries, fluorescent light ballasts, sodium lamps, and mercury switches, may be present throughout the project-site buildings. Radioactive materials may also be present in self-luminous signs and smoke detectors. Surveys and abatement/removal are recommended before building demolition and/or remodeling. [1]

- **OEF 1: Existing Electrical Equipment in Vaults.** Antiquated oil-cooled transformers, potentially containing PCBs, are still present in three vaults. Oil was found on the concrete floor in one of the vaults, but it is not clear if it was from the transformer or other electrical equipment. Light staining in a second vault suggests spilled oil has been cleaned up in the past. In both of these vaults, it is unclear if the oil contains PCBs. Ponded water in a third vault prevented inspection, but a decal on the door warns of PCB presence. The release of PCB-containing oil from all subsurface and subfloor vaults is considered an REC, and the presence of PCB-containing equipment in the three vaults is considered an OEF. Inspection and/or sampling of the equipment is recommended to determine if it contains PCBs.

- **OEF 2: Rooftop Transformer Vault.** Construction documents reveal that a transformer vault on the roof of Ward E once housed an oil-cooled transformer and other PCB-containing electrical equipment, including oil fused cutout (OFCs). Although these were removed in the early 1990s, it is unclear if the original oil-cooled transformers still exist. The impact of leaked oil on the vault and nearby building materials is also unknown. It is recommended that the rooftop vaults be inspected and appropriate mitigation action be taken if needed.

- **OEF 3: Abandoned Exploratory Borings.** In 1947, Chevron U.S.A., Inc. drilled three "geophysical prospect" borings within the project site boundary. After reaching total depth, the borings were plugged by creating a bridge 10 feet below the ground surface (bgs), installing a 5-foot cement seal, and filling the remaining 5 feet with soil. There is no evidence of oil or gas production, and the potential for subsurface contamination is low.

[1] OEF locations are not specifically labeled on the figure because these materials are associated with existing building components and equipment that may occur throughout multiple structures across the project site, rather than as discrete, mappable point sources.

However, abandoned oil/gas wells and exploratory borings can leak methane gas, and the California Geologic Energy Management Division may require testing.

- **OEF 4: Swimming Pool Chemical Storage.** Previously, swimming pool water was conditioned using hydrochloric acid and sodium hypochlorite stored in aboveground storage tanks (ASTs) in two separate sheds. Sodium bicarbonate was also stored in bags and pails. Most chemicals have been removed, but the AST storage sheds remain. It is recommended that the underlying soil be visually inspected for indications of a release once the sheds are removed.

- **OEF 5: Fuel ASTs.** The Central Power Plant area, which is located in the project site, has two pairs of 20,000-gallon ASTs for emergency generators. The ASTs are installed on concrete pads with secondary containment curbing, and spill kits are maintained in each area. There are no visible signs of release.

- **OEF 6: Former Contractor Staging Area.** The Banning Tract is a mostly unimproved part of the project site in the southeast corner of the Main Campus that features several large material stockpiles that appear to be mostly yard waste and debris (see Figure 3.8-1). In 2016, a fenced area in the Banning Tract was used for construction equipment for a nearby traffic project. Fuel ASTs or hazardous substances within the enclosure were not observed, although the equipment likely contained fuel and automotive fluids. After removing the equipment, no staining was found, but overgrowth made inspection difficult.

Vapor Intrusion/Vapor Encroachment

As part of the Phase I ESA, the potential presence of vapor intrusion conditions (VIC) and/or vapor encroachment conditions (VEC) at the project site were evaluated.[2] VICs occur when volatile organic compounds (VOC) are present in the vadose zone or groundwater, potentially causing vapor to intrude and accumulate in structures at concentrations potentially hazardous to human health.[3] Based on the storage and dispensing of gasoline, which contains benzene and other VOCs; the likely use of solvents in and around the paint shop; and absent soil vapor sampling data, localized VECs are possible in the MPO yard. VECs elsewhere at the project site are unlikely due to the absence of significant solvent use. It is unlikely that fuel releases from nearby gas stations or auto dealerships have impacted soil vapor beneath the project site.

[2] Vapor intrusion/vapor encroachment is evaluated as part of the Phase I ESA to assess whether existing environmental conditions at the site could affect future occupants of the project. This evaluation addresses the impact of the environment on future residents and does not constitute an environmental impact of the project under CEQA, consistent with Building Industry Association v. Bay Area Air Quality Management District (2015).

[3] The vadose zone is the Earth's terrestrial subsurface that extends from the surface to the regional groundwater table (Holden and Fierer 2005).

Phase II Environmental Site Assessment

A Phase II ESA subsurface environmental investigation was conducted for the Main Campus within the project site. The Main Campus area includes all the administrative, educational, recreational, and dormitory buildings, most of which are within Shelley Circle. In the middle of the Main Campus area is the Central Power Plant (CPP), attached laundry facility, and a large institutional kitchen with an attached warehouse. The CPP features boilers for heating, chillers for cooling, and backup electrical generators.

As shown in Figure 3.8-1, there is one REC, four HRECs, and nine OEFs associated with the Main Campus. Figure 3.8-1 notes that the former existing PCB Transformer are considered REC 1 but are not individually annotated as such. The Phase II ESA involved collecting and analyzing soil matrix and vapor samples at 17 biased and 6 unbiased locations. The biased locations were related to identified RECs, HRECs, and OEFs, and the unbiased locations were in areas with no hazardous substance use history.

The findings of the Phase II ESA investigation in the Main Campus area are summarized below which includes the presence or absence of the various contaminants analyzed in soil and soil vapor. Figure 3.8-2, *Main Campus Investigation Locations*, shows the environmental conditions and soil borings conducted.

- The project site is underlain by a mixture of poorly graded fine-grained sands, silts, and to a lesser extent, clays, and groundwater was not encountered within 15 feet of the ground surface.
- Soil beneath the project site contains naturally occurring metals at background concentrations and locally contains traces of TPH, VOCs, and semi-VOCs at concentrations well below residential screening levels.

PCB 1260 (a commercial mixture of PCB) was found in soil samples from the kitchen basement and laundry facility. PCB-containing soil beneath the kitchen basement does not appear to extend vertically to two feet bgs, and the concentration is below the residential Department of Toxic Substances Control–modified Screening Level (DTSC-SL). However, concentrations in the soil beneath a vault in the laundry facility exceed commercial/industrial DTSC-SL at 0.5 and 5.0 feet bgs, and the impact's lateral and vertical extent is not defined.



- Project Site Boundary
- Shallow soil boring advanced to 5 feet below ground surface (bgs).
- Former Existing PCB Transformer Location. PCB Transformers are Considered REC 1 but are not individually annotated as such.
- Abandoned Geophysical Prospect Hole
- Administration, Education or Recreation
- Facilities, Operation, and Maintenance
- Dormitory/Residential
- Historical Recognized Environmental Condition (HREC)
- Other Environmental Feature (OEF)

NOTE:
1. PCB - Polychlorinated Biphenyl
2. PCB - Transformer are considered REC 1 but are not individually annotated as such.
3. ACMs, LBP, and universal wastes throughout the onsite structures, but are not individually annotated.

0 300
Scale (Feet)

Source: Nearmap 2025; AVOCET Environmental 2021.

Figure 3.8-2
Main Campus Investigation Locations

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Soil vapor beneath the project site contains numerous VOCs, including tetrachloroethylene (PCE) and Trichlorofluoromethane (Freon-11), which are reported in most samples. Freon-11 concentrations are below residential DTSC-SL for indoor air; however, several of the reported PCE concentrations exceed the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) residential environmental screening level (ESL) and commercial/industrial ESL. A preliminary and conservative vapor intrusion assessment suggests that hypothetical concentrations of PCE, TCE, and chloroform in indoor air could exceed screening levels, indicating potential contamination.

Based on the findings of the Phase II ESA, the following environmental conditions from the Main Campus area are recategorized:

- **REC: PCB Releases in Electrical Vaults.** Transformers and other electrical equipment known to have contained PCBs were installed aboveground and in subsurface vaults throughout the project site. To investigate possible PCB impacts, soil matrix samples from a single five-foot boring in each of 11 vaults were collected and analyzed. No PCBs were detected in the soil samples collected from 9 of the 11 vaults, and the reported concentration of PCB 1260 in the 10th was not significant. As such, possible PCB releases in Vaults 2, 5, 8, 9, and 10 and the vaults in basement of the kitchen (Vault 11) and in the Receiving and Treatment building (Rooms 105 and 114) are now considered OEFs instead of an REC. However, soil samples collected from Vault 12 in the laundry facility contained PCB 1260 at concentrations above commercial/industrial screening levels at 0.5 and five feet bgs, and the lateral and vertical extent of the impacted soil is not defined. Therefore, PCB releases from Vault 12 remain an REC for the project site, but direct exposure is unlikely, and additional delineation and/or remediation may not be practical until the laundry facility is demolished.
- **HREC 1: Former 18,000-Gallon Fuel Oil USTs.** Two 18,000-gallon USTs were installed at the project site in 1955 to store backup fuel for the natural-gas-fired boilers in the CPP. The 18,000-gallon USTs were permanently closed by removal, with oversight from OCHCA in May 1992 and were replaced with a single 20,000-gallon diesel UST at the same location. The analysis of soil and soil vapor samples indicates that the impact, if any, on the subsurface environment has been negligible, and therefore the former 18,000-gallon fuel oil USTs remain an HREC.
- **HREC 2: Former 12,000-Gallon Diesel UST.** In 1975 a 12,000-gallon UST was installed to hold diesel fuel for an emergency electrical generator system at CPP. In June 1999, the 12,000-gallon diesel UST was permanently closed by removal, with OCHCA oversight, although much of the associated subsurface piping was left in place that was too difficult to remove because of utility line conflicts. The analysis of soil and vapor samples indicates that the impact, if any, on the subsurface environment has been negligible, and therefore the former 12,000-gallon diesel UST remains an HREC.

- **HREC 3: Former 20,000-Gallon Diesel UST.** The double-walled 20,000-gallon diesel UST installed in 1992 to replace the original 18,000-gallon fuel oil USTs (HREC 8) for the CPP boilers was permanently closed by removal in January 2005. The analysis of soil and soil vapor samples - indicate that the impact, if any, on the subsurface environment has been negligible, and therefore the former 20,000-gallon diesel UST remains an HREC.

- **HREC 4: Soil Impacts in CMCC Encroachment Area.** CMCC equipment and vehicle maintenance activities, such as oil changes, resulted in near-surface soil impacts involving petroleum hydrocarbons inside the southern boundary of the project site. The scope of work for the subject investigation did not include soil or soil vapor sampling in the CMCC encroachment area; therefore, soil impacts in the CMCC encroachment area remain an HREC.

- **OEF: ACMs, LBP, and Universal Wastes.** Consistent with being built in the late 1950s, ACMs have been documented in certain portions of the buildings at the FDC, notably in such things as thermal system insulation in the CPP, and ACMs are likely present in such things as vinyl floor tile and mastic, roofing materials, and the like. Because the ACMs, LBPs, and universal wastes were not within the scope of the Phase II investigation, they remained an OEF for the project site.[4]
- **OEF 1: Existing Electrical Equipment in Vaults 6 and 13.** Antiquated oil-cooled transformers potentially containing PCBs are still present in Vaults 6 and 13. The subject investigation did not include soil or soil vapor sampling in Vaults 6 and 13; therefore, possible soil impacts beneath Vaults 6 and 13 remain an OEF.
- **OEF 2: Rooftop Transformer Vault.** Construction documents provided by the Department of General Services indicate that a transformer vault on the roof of the Ward E building originally housed an oil-cooled, possibly PCB-containing, transformer as well as other PCB-containing electrical equipment, including OFCs. The construction documents indicate that the PCB-containing OFCs were removed in the early 1990s, but it is not known if the original oil-cooled transformer remains in place. The subject investigation did not include investigation of the transformer vault; therefore, the rooftop transformer vault remains an OEF.

- **OEF 3: Abandoned Exploratory Borings.** According to records available online, Chevron U.S.A., Inc. drilled three "geophysical prospect" borings within the project site in 1947. Identified as Chevron NC-110, NC-112, and NC-114, the three borings were advanced to total depths of 785, 680, and 1,175 feet bgs, respectively. The exact locations of the three abandoned exploration borings are unknown, and any surface indications of the borehole

[4] OEF locations are not specifically labeled on the figure because these materials are associated with existing building components and equipment that may occur throughout multiple structures across the project site, rather than as discrete, mappable point sources.

locations have long since been obliterated, so investigation of the abandoned borings is not currently feasible and was not within the scope of the Phase II investigation. Therefore, the abandoned exploration borings remain an OEF for the project site.

- **OEF 4: Swimming Pool Chemical Storage.** In the past, swimming pool water was conditioned using hydrochloric acid and sodium hypochlorite stored in ASTs in two separate sheds. Sodium bicarbonate was also previously stored in bags and 5-gallon pails in the pool equipment room. Most, if not all, of these pool chemicals have been removed; however, the AST storage sheds are still in place. Because the storage sheds have not yet been removed from the site, the subject investigation did not include inspection of the underlying soil; therefore, the swimming pool chemical storage remains an OEF.

- **OEF 5: Fuel ASTs.** The Central Power Plant area, which is located in the project site, has two pairs of 20,000-gallon ASTs for emergency generators. The ASTs are installed on concrete pads with secondary containment curbing, and spill kits are maintained in each area. There are no visible signs of release.

- **OEF 6: Former Contractor Staging Area.** The Banning Tract is a mostly unimproved part of the project site in the southeast corner of the Main Campus that features several large material stockpiles that appear to be mostly yard waste and debris (see Figure 3.8-1). In 2016, a fenced area in the Banning Tract was used for construction equipment for a nearby traffic project. Fuel ASTs or hazardous substances within the enclosure were not observed, although the equipment likely contained fuel and automotive fluids. After removing the equipment, no staining was found, but overgrowth made inspection difficult.

Environmental Database Listings

An environmental database search of GeoTracker and EnviroStor was conducted for the project site in December 2025. Table 3.8-1, *Hazardous Materials Listings*, summarizes all identified database listings associated with the project site.

AIRPORT-RELATED HAZARDS

John Wayne Airport, an international airport owned and operated by the County of Orange, borders Costa Mesa on the east, between State Route 73 and Interstate 405. The project site is approximately 3.4 miles northeast of John Wayne Airport. According to Figure S-8, *John Wayne Airport Safety*, in the City's Safety Element, the project site is not located within the airport safety zones (Costa Mesa 2015).

WILDFIRE HAZARDS

Wildfires are deadly and can cause catastrophic damage to property, infrastructure, and ecosystems. Under the right conditions, a small fire can quickly grow into an enormous, rapidly

moving blaze. The smoke from wildfires can travel hundreds of miles and cause health problems. The project site is within a Local Responsibility Area per California Government Code Section 51178, meaning the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of a Local agency, or the Costa Mesa Fire and Rescue Department. However, the project site is not within a High or Very-High Fire Hazard Severity Zone.

3.8.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to hazards and hazardous materials if it would:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.

d) Be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

METHODOLOGY

Phase I Environmental Site Assessment

The Phase I ESA was prepared by Avocet on behalf of the California Department of General Services (DGS) to document environmental conditions for decision-making related to potential divestment, redevelopment, or repurposing of the FDC property (see Appendix F.1). The Phase I ESA was conducted in general accordance with the scope, limitations, and intent of ASTM Standard E1527-13 (ASTM, 2013) and the standard of care customary in the environmental consulting industry at the time the assessment was performed.

Phase II Environmental Site Assessment

Based on the findings of the Phase I ESA, the completion of a Phase II ESA was recommended to evaluate whether and to what extent subsurface conditions may have been affected by identified RECs, HRECs, and OEFs (see Appendix F.2).

The Phase II ESA scope of work included the collection and laboratory analysis of soil matrix and soil vapor samples from a total of 23 locations, consisting of 17 biased and six unbiased sampling locations. Biased sampling locations were selected based on the locations of identified RECs, HRECs, and OEFs, while unbiased locations were distributed across the Main Campus area of the FDC to provide representative spatial coverage and were not associated with specific environmental features.[5]

3.8.4 Project Impact Analysis

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

CONSTRUCTION

Construction of the proposed project would disturb areas containing known hazardous materials associated with the former FDC, including PCBs in electrical equipment and vaults, residual petroleum from historic fuel storage, building materials with asbestos and lead-based paint, and localized areas with solvent- or PCB-impacted soil, as identified in the Phase I and II ESAs. These hazardous materials are distributed throughout the project site, as shown in Figure

[5] Biased sampling locations are intentionally selected to target known or suspected areas of contamination, including identified RECs, HRECs, or OEFs. Unbiased sampling locations are selected independently of known or suspected contamination sources and are distributed across the site to provide representative spatial coverage and general site characterization rather than to evaluate specific environmental features.

3.8-1 and Figure 3.8-2. Demolition, grading, and other ground-disturbing activities could encounter these contaminants and mobilize them if not properly managed.

In addition, the Department of Toxic Substances Control (DTSC) submitted comments on the NOP highlighting the potential for historic and future activities at the site to result in the release of hazardous materials. In response, the construction phase of the project warrants careful review to ensure appropriate evaluation and management of hazardous substances pursuant to regulatory compliance with federal and state laws.

Because hazardous materials are present across portions of the project site and construction activities could expose workers or the environment to these substances, the proposed project would result in a **potentially significant impact.**

Significance without Mitigation: Potentially Significant.

Impact HAZ-1: The construction phase of the proposed project would create a potentially significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Mitigation Measure HAZ-1a: Soil Screening and Impacted Soil Management.

Prior to and during any demolition, grading, or other ground-disturbing activities, the project applicant shall retain a qualified environmental professional (QEP) to oversee earthwork in areas associated with Recognized Environmental Conditions (RECs), Historic Recognized Environmental Conditions (HRECs), or identified/potential other environmental conditions (OECs). The QEP shall screen disturbed soils for evidence of contamination, including staining, odors, debris, or elevated instrument readings. If suspected contamination is encountered. Impacted soils shall be handled, characterized, and disposed of in compliance with all applicable federal, state, and local regulations.

If contamination is confirmed, the project applicant shall notify and obtain oversight from the appropriate regulatory agency, which may include a self-certified local agency, Department of Toxic Substances Control (DTSC), or the Regional Water Quality Control Board based on the nature and extent of the contamination. All required investigation, remediation, and verification activities shall be completed under regulatory oversight before construction activities resume in the affected area.

Mitigation Measure HAZ-1b: Hazardous Building Materials Survey and Abatement.

Prior to demolition of any on-site buildings or structures, the project applicant shall ensure a comprehensive hazardous materials survey is conducted in accordance with

DTSC's Preliminary Endangerment Assessment (PEA) Manual. The survey shall identify the presence of asbestos-containing materials, lead-based paint, polychlorinated biphenyls (PCBs), and other hazardous building materials. Identified materials shall be removed and disposed of by licensed abatement contractors in compliance with applicable federal, state, and local regulations.

Mitigation Measure-HAZ-1c: Imported Fill Testing and Approval

If imported fill is required, the project applicant shall ensure that all filling materials are sampled and tested for contaminants consistent with the DTSC PEA Manual. Documentation demonstrating the fill's origin, testing results, and suitability for the intended use shall be submitted to the City for review in coordination with the Orange County Public Works, Development Services (Building & Safety) department and approval prior to importation and placement on the project site.

Significance with Mitigation: Less than significant. With implementation of Mitigation Measures HAZ-1a through HAZ-1c, which require soil screening, hazardous materials surveys of buildings, proper handling and disposal of impacted soil and building materials, testing of imported fill, and oversight by a qualified environmental professional under an appropriate regulatory agency, the potential for exposure to hazardous materials during construction would be substantially reduced. These measures ensure that contaminated soil, building materials, and other hazardous substances are identified, managed, and disposed of in compliance with all applicable regulations, and that any previously unknown contamination is properly addressed before it poses a risk to workers or the environment. Therefore, with mitigation in place, the impact of construction-related disturbance of hazardous materials would be less than significant.

OPERATION

The proposed project would not include industrial uses or other activities involving the storage, use, transport, or disposal of large amounts of hazardous materials. Land uses accommodated by the project are limited to residential and commercial/mixed uses, which generally involve only small quantities of hazardous materials.

During operation, limited amounts of hazardous materials may be used for cleaning and maintenance, such as paints, household cleaners, fertilizers, and pesticides. The handling, storage, transport, and disposal of these materials would be regulated under existing federal and state laws, including the RCRA, CERCLA, Hazardous Materials Transportation Act, the International Fire Code (IFC), California Code of Regulations (CCR) Titles 22 and 27, and Health and Safety Code requirements for final occupancy (Gov. Code sec. 65850.2; HSC, Div. 20, Ch. 6.95, Art. 2, secs. 25500–25520).

The OCHCA, as the CUPA, oversees hazardous materials management and environmental protection for local businesses and facilities. Businesses and developments must prepare a Hazardous Materials Business Plan, which details the location, type, quantity, and health risks of hazardous materials, and includes an emergency response plan for rapid mitigation of accidental releases and immediate notification to the OCHCA (OCHCA 2025a, 2025b).

Compliance with these regulations and the implementation of emergency response procedures would ensure that all hazardous materials associated with future development are handled appropriately, minimizing the potential for public or environmental harm. Therefore, the risk of hazards from accidental release of hazardous materials during project operation is not anticipated. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

CONSTRUCTION

Construction activities, including demolition, grading, and other ground-disturbing work, could encounter hazardous materials at the project site. These include PCBs in electrical equipment and vaults, residual petroleum from historic fuel storage, asbestos-containing materials, lead-based paint, and localized areas of solvent- or PCB-impacted soil, as identified in the Phase I and Phase II ESAs (see Figure 3.8-1 and Figure 3.8-2). Uncontrolled release or accidental disturbance of these substances could result in exposure to workers or the environment, creating the potential for spills, leaks, or other upset conditions. Therefore, this impact is **potentially significant**.

Significance without Mitigation: Potentially Significant.

Impact HAZ-2: The construction phase of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset or accidental release of hazardous materials.

Mitigation Measure: Implement Mitigation Measures HAZ-1a through HAZ-1c.

Significance with Mitigation: Less than significant. Mitigation Measure HAZ-1a through HAZ-1c requires retention of a QEP to oversee soil screening and management, predemolition hazardous materials surveys and abatement, and testing and approval of imported fill. Oversight by a regulatory agency ensures that any identified contamination is properly managed and that accidental releases or upset conditions are mitigated before construction activities resume in

affected areas. Implementation of Mitigation Measures HAZ-1a through HAZ-1c reduces the potential for accidental release or upset involving hazardous materials during construction. Therefore, this impact is considered less than significant after mitigation measure implementation.

OPERATION

The project is limited to residential and commercial/mixed uses that involve only small quantities of hazardous materials for cleaning, maintenance, landscaping, and pest control (e.g., paints, household cleaners, fertilizers, and pesticides). The handling, storage, and disposal of these materials would be governed by existing federal and state regulations, including RCRA, CERCLA, the Hazardous Materials Transportation Act, IFC, CCR Titles 22 and 27, and Health and Safety Code requirements. The OCHCA, as the CUPA, requires preparation of a Hazardous Materials Business Plan and emergency response procedures to ensure rapid mitigation of accidental releases (OCHCA 2025a, 2025b). Therefore, operational impacts are considered **less than significant.**

Significance without Mitigation: Less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school?

There are no existing or proposed schools within a quarter mile of the project site. The nearest school, Estancia High School, is 0.57 mile southwest of the project site. Construction activities would occur primarily on-site, with limited off-site improvements on Harbor Boulevard/Proposed Secondary Access-Harbor Center intersection, which is farther from the high school than 0.57 miles. Any hazardous materials present on-site would be managed and remediated within confined areas by trained professionals in accordance with applicable regulations, minimizing the potential for exposure. Operation of the project would not involve the use, storage, or release of hazardous materials in quantities that could affect nearby schools. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

California Government Code Section 65962.5 requires the State to compile lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Resources Control Board has issued certain types of orders; public

drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated (Cal EPA 2025).

The Phase I and Phase II ESAs for the project site identified the presence of current or former hazardous materials, including historic USTs and areas with potential contamination. These conditions indicate that hazardous materials are or were present on the property and may require proper management during development. However, a review of the EnviroStor and GeoTracker databases confirmed that the project site is not included on the Cortese List or any other hazardous materials site list compiled pursuant to Government Code Section 65962.5 (DTSC 2025; SWRCB 2025).

Because the project site is not listed pursuant to Government Code Section 65962.5, the project would not create a hazard to the public or the environment as a result of being on a listed hazardous materials site, even though hazardous materials are present and addressed under other impact topics. Therefore, the impact related specifically to Government Code Section 65962.5 would be **less than significant.**

Significance without Mitigation: Less than significant.

e) For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The nearest public airport to the project site is the John Wayne Aiport, located approximately three miles northeast of the project site. The project site is not located within an airport land use plan area, is not located within the Airport Safety Zone, and is not within two miles of a public or public use airport. Therefore, the proposed project would not result in an airport-related land use conflict, and **no impact** would occur.

Significance without Mitigation: No Impact.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

CONSTRUCTION

Construction activities would be generally confined to the project site and not interfere with traffic flows during an emergency evacuation. However, the proposed project includes off-site roadway improvements along Harbor Boulevard, including Harbor Boulevard/Proposed Secondary Access-Harbor Center intersection in the southeast portion of the project site. These

improvements could require temporary lane closures or partial roadway obstruction during construction.

Harbor Boulevard is designated as a primary evacuation route in the City's Safety Element (Figure S-9, Public Safety Facilities and Emergency Evacuation Routes). As a result, even short-term disruptions could interfere with emergency response activities or evacuation access if not properly managed. Therefore, construction-related impacts associated with temporary off-site roadway improvements would be **potentially significant.**

Significance without Mitigation: Potentially Significant.

Impact HAZ-3: Temporary off-site construction activities along Harbor Boulevard, an established evacuation route, could impair emergency response or evacuation access.

> **Mitigation Measure HAZ-2:** Prior to issuance of grading permits, the project applicant and/or their construction contractor shall prepare a Construction Traffic Management Plan to ensure that alternate routes are provided and maintained during temporary road closures or construction activities along Harbor Boulevard. The Construction Traffic Management Plan shall detail construction hours, truck routes, travel patterns for haul routes, traffic detour routes, staging and parking areas, emergency vehicle access provisions, and coordination protocols with local emergency service providers. The plan shall be submitted to the Costa Mesa Public Works Department and the Costa Mesa Fire & Rescue Department for review and approval prior to the start of construction activities. The plan shall also require the construction contractor to implement the following measures during construction activities, which shall be discussed at a pre-grading conference/meeting.
>
> - Minimize obstruction of roadways, bikeways, and sidewalks and provide temporary traffic controls, including use of a flag person as appropriate.
> - Develop a traffic plan to minimize interference of emergency vehicles and personnel from demolition and construction activities (e.g., advance public notice of demolition and construction activities).
>   - When emergency responders approach the construction zone with lights and sirens (Code 3) the contractor shall temporarily suspend all construction activity and remove barriers or other obstructions where possible to allow emergency vehicles to pass through the construction zone.

Significance with Mitigation: Less than significant. The development and implementation of a Construction Traffic Management Plan with detour routing and coordination with emergency service providers would allow continuous emergency access along Harbor Boulevard. Additionally, Construction activities would be subject to standard traffic control measures to

ensure roadway access is maintained. With implementation of Mitigation Measure HAZ-2, the proposed project would not impair or physically interfere with implementation of an adopted emergency response or evacuation plan, and impacts would be less than significant.

OPERATION

The proposed project includes on-site and off-site roadway and access improvements that would be designed to maintain adequate emergency access and response times during project operations. Specifically, the Harbor Boulevard/Proposed Secondary Access-Harbor Center intersection would provide an additional point of ingress and egress, ensuring continued emergency vehicle access to and from the project site.

Roadway and project site access designs would be subject to the City's development review and permitting process, including review by the Costa Mesa Public Works Department and the Costa Mesa Fire Department. This review process ensures that roadway and access improvements are adequate to support emergency response and evacuation consistent with the City's adopted emergency response framework. All roadway and site access designs would be prepared in accordance with the City's adopted design standards and the California Fire Code requirements related to emergency vehicle access, roadway widths, and fire apparatus access.

Emergency response and evacuation in Costa Mesa are coordinated through the City's OEM, who works in coordination with first responders, including the Costa Mesa Fire Department and Police Department to implement the City's adopted emergency response and evacuation plans (Costa Mesa 2025b). By ensuring that project roadways and access points meet City and California Fire Code standards, the proposed project would support emergency operations by maintaining reliable emergency vehicle access and evacuation routes during an emergency.

In addition, the General Plan Safety Element Policy S-2.9 emphasizes adequate emergency access to support efficient emergency response, particularly in areas identified by the Costa Mesa Fire Department as having elevated fire hazard potential. Although the project site is not within a fire hazard area, the proposed project would support efficient emergency response with the Harbor Boulevard/Proposed Secondary Access-Harbor Center intersection.

Compliance with the City's design standards and California Fire Code requirements would ensure the operation of the proposed project would not interfere with emergency response or evacuation procedures. Therefore, operation of the proposed project would not impair implementation of an adopted emergency response or emergency evacuation plan, and operational impacts related to emergency response and evacuation would be **less than significant.**

Significance without Mitigation: Less than significant

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

According to the California Department of Forestry and Fire Protection (CAL FIRE) and Costa Mesa's adopted Fire Hazard Severity Zone mapping, the project site is not in a High or Very High Fire Hazard Severity Zone (CAL FIRE 2025). As a result, implementation of the proposed project would not expose people or structures to a substantial risk associated with wildland fires.

The proposed project would be required to comply with applicable State, regional, and local regulations including the California Fire Code, California Building Code, and the Costa Mesa Safety Element, which have requirements for new development to minimize fire risk to people, property, and the environment. Specifically, General Plan Safety Element Policy S-2.6 requires new development to have adequate water supply to combat structural fires that meets minimum fire-flow pressures. Additionally, Policy S-2.7 requires new development to contribute its fair share toward funding fire and emergency medical services necessary to adequately serve the project.

Proposed development under this proposed project would be required to undergo development review to ensure compliance with State and local requirements for minimizing structural and wildland fires. The proposed project's location outside a designated High or Very High Fire Hazard Severity Zone and State, and local requirements for fire-safe design and construction, the proposed project would not substantially increase wildfire-related hazards. Therefore, this impact would be **less than significant.**

Significance without Mitigation: Less than significant.

3.8.5 Cumulative Impact Analysis

The cumulative setting for hazards and hazardous materials considers the proposed project together with other existing, approved, and reasonably foreseeable development within the city of Costa Mesa, including the Harbor Village Apartments to the north of the project site and the Regional Emergency Operations Center southwest of the project site. Cumulative development may involve demolition or earthwork in areas with hazardous building materials or residual contamination similar to those identified on the project site.

Would the project have a cumulative effect related to hazards and hazardous materials?

The project site is in a fully urbanized area surrounded by residential, commercial, and recreational uses, where heavy industrial activities and associated hazardous materials are not common. Cumulative construction activities in the area could encounter or generate hazardous materials from historical land uses; however, all projects including the proposed project must comply with federal and state hazardous materials regulations enforced by DTSC, the RWQCB,

and the CUPA. Cumulative operational activities would involve typical residential and commercial uses that store and use only small quantities of common household or consumer-grade hazardous materials under CUPA oversight. As a result, cumulative operational impacts related to hazardous materials use or accidental release would be **less than significant.**

Significance without Mitigation: Less than significant.

The proposed project includes mitigation requiring soil screening and management, hazardous building materials abatement, and imported fill testing (Mitigation Measures HAZ-1a through HAZ-1c). Other cumulative projects with similar site histories would implement comparable measures, ensuring that the proposed project's contribution would not be cumulatively considerable. Impacts would be **less than significant.**

Significance with Mitigation: Less than significant.

No cumulative projects introduce substantial hazardous emissions within 0.25 miles of a school. The project site and surrounding urbanized area are not listed on the Cortese List. The proposed project is also outside airport land use influence zones and High or Very High Fire Hazard Severity Zones; therefore, no cumulative aviation or wildland fire hazards would occur. Impacts would be **less than significant.**

Significance without Mitigation: Less than significant.

Some cumulative projects may involve off-site roadway improvements that temporarily affect evacuation routes. The Harbor Boulevard/Proposed Secondary Access-Harbor Center intersection could contribute to short-term disruptions; however, Mitigation Measure HAZ-2 requires a Construction Traffic Management Plan with detours and emergency access provisions, similar to requirements for other roadway projects in the area. With these measures, the project would not make a cumulatively considerable contribution to impacts on emergency response or evacuation routes. Impacts would be **less than significant.**

Significance with Mitigation: Less than significant.

3.8.6 References

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3.9 HYDROLOGY AND WATER QUALITY

This section of the DEIR evaluates the potential impacts of the Fairview Developmental Center Specific Plan (proposed project) to hydrology and water quality conditions in the City of Costa Mesa. Hydrology deals with the distribution and circulation of water on land and underground. Water quality deals with the quality of surface and groundwater. Surface water includes lakes, rivers, streams, and creeks; groundwater is under the earth's surface. The analysis in this section is based in part on the following technical reports.

- *Water Supply Assessment for the Fairview Developmental Center Specific Plan*, West & Associates Engineering, Inc., March 2026 (DEIR Appendix G.1)
- *Proposed Conditions Infrastructure Report for Sewer and Drainage*, Fuscoe Engineering, Inc., February 2026 (DEIR Appendix K.1)
- *Phase II Investigation Report for Main Campus Area, Fairview Development Center*, Avocet Environmental, Inc., July 2021 (DEIR Appendix F.2)

Terminology

- **BMPs:** best management practices
- **LID:** low impact development
- **MS4:** municipal separate storm sewer system
- **NPDES:** National Pollution Discharge Elimination System
- **SWPPP:** Stormwater Pollution Prevention Plan
- **WQMP:** Water Quality Management Plan
- **TMDL:** Total maximum daily load. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body can receive without exceeding applicable water quality standards, with a factor of safety included. Required by the Clean Water Act for impaired water bodies.
- **100-year storm:** Rainfall total that has a 1 percent probability in a year.

Notice of Preparation Comments

The City received three letters regarding hydrology and water quality issues, from the Santa Ana Regional Water Quality Control Board on November 20, 2025; Costa Mesa First on December 5, 2025; and Wendy Leece on December 5, 2025, for the Notice of Preparation (NOP). The comment letters raise these concerns.

- The DEIR should demonstrate the proposed project's compliance with applicable regional and state stormwater regulations, including municipal separate storm sewer system (MS4)

permit requirements, the Construction General Permit, and related water quality management and low-impact development standards.

- The City primarily depends on groundwater for its water supply and increased demand could result in impacts to existing water users.
- Has the City has communicated with Costa Mesa Water District and will the project increase water bills for other residents? Also, how will the proposed project affect water quality?

The relevant hydrology and water quality issues raised by these comment letters are addressed in this section. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, Introduction, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the complete comment letters

3.9.1 Regulatory Framework

FEDERAL

Section 401 of the Clean Water Act

The federal Water Pollution Control Act (or Clean Water Act [CWA]) is the principal statute governing water quality. It establishes the basic structure for regulating discharges of pollutants into the waters of the United States and gives the US Environmental Protection Agency (EPA)—or in the case of California, the State Water Resources Control Board (or State Water Board [SWRCB]) and Regional Water Quality Control Boards (or Regional Water Board [RWQCB])—authority to implement pollution control programs. The statute's goal is to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates direct and indirect discharge of pollutants; sets water quality standards for all contaminants in surface waters; and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges; requires states to establish site-specific water quality standards; and regulates other activities that affect water quality, such as dredging and the filling of wetlands.

National Pollutant Discharge Elimination System

Under the National Pollutant Discharge Elimination System (NPDES) program (CWA Section 402), all facilities that discharge pollutants from any point source into a water of the United States must have a NPDES permit. The term "pollutant" broadly applies to any type of industrial, municipal, and agricultural waste discharged into water. Point sources can be publicly owned treatment works (POTW), industrial facilities, and urban runoff (the NPDES program addresses certain agricultural activities, but the majority are considered nonpoint sources and are exempt from NPDES regulation). Direct sources discharge directly to receiving waters, and indirect sources discharge to POTWs, which in turn discharge to receiving waters. Under the national program, NPDES permits are issued only for direct, point-source discharges. The National

Pretreatment Program addresses industrial and commercial indirect discharges. Municipal sources are POTWs that primarily receive domestic sewage from residential and commercial customers. Specific NPDES program areas applicable to municipal sources are the National Pretreatment Program, the Municipal Sewage Sludge Program, Combined Sewer Overflows, and the Municipal Storm Water Program. Nonmunicipal sources include industrial and commercial facilities. Specific NPDES program areas applicable to these industrial/commercial sources are: Process Wastewater Discharges, Non-process Wastewater Discharges, and the Industrial Storm Water Program. NPDES issues two basic permit types: individual and general. Also, the EPA has recently focused on integrating the NPDES program further into watershed planning and permitting.

The NPDES has a variety of measures designed to minimize and reduce pollutant discharges. All municipalities with storm drain systems that serve a population of 50,000 or more, construction sites one acre or more in size, and any other source discharges of pollutants to jurisdictional waters must file for and obtain an NPDES permit. New development projects are required to implement erosion and sediment control plans, including appropriate erosion and sediment control best management practices (BMPs), a stormwater pollution prevention plan (SWPPP), and water quality management plans (WQMP), as applicable. Further, projects must ensure, to the maximum extent practicable, that runoff from development projects does not cause a nuisance to adjoining or downstream properties and stream channels, and that appropriate control measures are taken to reduce erosion and maintain stream geomorphology. Projects are also required to emphasize implementation of low-impact development (LID) principles, where feasible, and appropriately maintain urban runoff conveyance systems from development projects.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program, which provides subsidized flood insurance to communities that comply with FEMA regulations limiting development in flood plains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection established by FEMA is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

STATE

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code sections 13000 et seq.) is the basic water quality control law for California. Under this Act, the SWRCB has ultimate control over state water rights and water quality policy. In California, the EPA has delegated authority to issue NPDES permits to the SWRCB. The SWRCB, through its nine RWQCBs carries out the regulation,

protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan (or Basin Plan [WQCP]) that designates beneficial uses and water quality objectives for the region's surface water and groundwater basins.

Safe Water Drinking Act

The Safe Water Drinking Act of 1974 regulates public drinking supplies to protect public health and safety. The law is designed to protect drinking water and water sources such as rivers, lakes, reservoirs, springs, and groundwater wells.

SWRCB Construction General Permit

Construction activities that disturb one or more acres of land must comply with the requirements of the SWRCB Construction General Permit (CGP). Due to the proposed project exceeding one acre of land, it would be required to conform to the requirements of the SWRCB. Under the terms of the permit, applicants must file Permit Registration Documents (PRDs) with the SWRCB prior to the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, SWPPP, annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website. The most recent SWRCB Construction General Permit is Order WQ 2022-0057-DWQ, adopted on September 8, 2022, and effective as of September 1, 2023. This permit (2022 CGP) replaces the previous 2009 permit, introducing new requirements for monitoring, TMDL implementation, passive treatment, and dewatering, with full compliance mandated for projects (SWRCB 2026a).

Applicants must also demonstrate conformance with applicable BMPs and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. A BMP is defined by the Stormwater Quality Task Force as any program, technology, process, siting criteria, operating method, measure, or device that controls, prevents, removes, or reduces storm water pollution. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program for all risk levels and a stormwater sampling and analysis program for Risk Levels 2 and 3.

SWRCB Trash Amendments

On April 7, 2015, the SWRCB adopted an amendment to the Water Quality Control Plan for Ocean Waters of California to control trash and Part 1, Trash Provisions, of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (SWRCB 2026b). They are collectively referred to as "the Trash Amendments." The Trash Amendments apply to all surface waters of California and include a land use-based compliance approach to focus trash controls on areas with high trash-generation rates. Areas such as high-density

residential, industrial, commercial, mixed urban, and public transportation stations are considered priority land uses.

The Trash Amendments provide a framework for permittees to implement their provisions. Full compliance must occur within 10 years of the permit, and permittees must also meet interim milestones such as average load reductions of 10 percent per year. The amendment mandates that the City needs to install catch basin filters on all City catch basins by December 2, 2030.

Water Conservation in Landscaping Act of 2006

The Water Conservation in Landscaping Act includes the State of California's Model Water Efficient Landscape Ordinance (MWELO), which requires cities and counties to adopt landscape water conservation ordinances. The MWELO was revised in July 2015 via Executive Order B-29-15 to address the ongoing drought and build resiliency for future droughts. State law requires all land use agencies, which includes cities and counties, to adopt a Water Efficient Landscape Ordinance that is at least as efficient as the MWELO prepared by the California Department of Water Resources. The 2015 revisions to the MWELO improve water conservation in the landscaping sector by promoting efficient landscapes in new developments and retrofitted landscapes. The revisions increase water efficiency by requiring more efficient irrigation systems, incentives for greywater usage, improvements in on-site stormwater capture, and limiting the portion of landscapes that can be covered in high-water-use plants and turf. New development projects that include landscape areas of 500 square feet or more are subject to the MWELO. This applies to residential, commercial, industrial, and institutional projects that require a permit, plan check, or design review. The previous landscape-size threshold for new development projects ranged from 2,500 square feet to 5,000 square feet. The size threshold for rehabilitated landscapes has not changed and remains at 2,500 square feet. The City of Costa Mesa has enacted these provisions in the Costa Mesa Municipal Code, Chapter 7, Landscaping Standards, under Section 13-101.1, Applicability.

The Sustainable Groundwater Management Act

The California Sustainable Groundwater Management Act (SGMA), a three-bill package signed into law in 2014 that creates a framework for the management of groundwater sources throughout the state. Under SGMA, local agencies form Groundwater Sustainability Agencies (GSAs) and create Groundwater Sustainability Plans (GSPs). If a GSA is not formed, special act districts, such as Orange County Water District (OCWD), can submit "alternative plans" to GSPs. Timelines and requirements are based upon basin priority. Under SGMA, the Orange County Groundwater Basin (OC Basin) is considered a medium-priority basin.

Under the Alternative Plan, four management areas have been created for the OC Basin. Each of these management areas has slightly different management goals and strategies based on the government bodies that serve them. The management areas follow (DWR 2022).

- **La Habra-Brea Management Area.** Includes the northern portion of the Basin outside of the OCWD service area.
- **OCWD Management Area.** Includes OCWD's service area, covering approximately 89 percent of the Basin.
- **South East Management Area. I**ncludes the southern and southeastern portions of the Basin that are outside of OCWD's service area.
- **Santa Ana Canyon Management Area. I**ncludes the eastern portion of the Basin outside of OCWD's service area.

REGIONAL

Water Quality Control Plan for the Santa Ana River Basin

In addition to its permitting programs, the SWRCB, through its nine Regional Water Quality Control Boards (RWQCBs), developed Regional Water Quality Control Plans (or Basin Plans) that designate beneficial uses and water quality objectives for California's surface waters and groundwater basins, as mandated by both the CWA and the state's Porter-Cologne Water Quality Control Act. Water quality standards are thus established in these Basin Plans and provide the foundation for the regulatory programs implemented by the state. The Santa Ana RWQCB's Basin Plan, which covers the FDCSP, specifically (1) designates beneficial uses for surface waters and ground waters, (2) sets narrative and numerical objectives that must be met in order to protect the beneficial uses and conform to the state's antidegradation policy, and (3) describes implementation programs to protect all waters in the Region. The ultimate goal is to protect and preserve this water resources as stated in the SWQRCBs Resolution No.68-16, Antidegradation Policy, which requires that existing high quality waters be maintained unless degradation is consistent with allowing the maximum benefit to the people of the State and does not unreasonably affect present and anticipated beneficial uses. Therefore, the proposed FDCSP will be subject to the Santa Ana RWQCB's Basin Plan objectives.

Total Maximum Daily Loads

Once a water body has been listed as impaired on the 303(d) list, the State's inventory of surface waters that do not meet water quality standards, a total maximum daily load (TMDL) for the constituent of concern (pollutants) must be developed for that water body. A TMDL is an estimate of the daily load of pollutants that a water body can receive from point sources, nonpoint sources, and natural background conditions (including an appropriate margin of safety) without exceeding its water quality standard. Those facilities and activities that are discharging into the water body, collectively, must not exceed the TMDL. In general terms, MS4 permittees and other dischargers within each watershed are collectively responsible for meeting the required reductions and other TMDL requirements by the assigned deadline.

Regional Beneficial Uses And Water Quality Objectives

Following the Santa Ana RWQCB Basin Plan, groundwater in the OC Basin is designated for these beneficial uses:

- **Municipal and Domestic Supply (MUN).** Waters are used for community, military, municipal or individual water supply systems. These uses may include, but are not limited to, drinking water supply.
- **Agricultural Supply (AGR).** Waters are used for farming, horticulture or ranching. These uses may include, but are not limited to, irrigation, stock watering, and support of vegetation for range grazing.
- **Industrial Service Supply (IND).** Waters are used for industrial activities that do not depend primarily on water quality. These uses may include, but are not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection and oil well repressurization.
- **Industrial Process Supply (PROC).** Waters are used for industrial activities that depend primarily on water quality. These uses may include, but are not limited to, process water supply and all uses of water related to product manufacture or food preparation.

Since the OC Basin groundwater is used for potable and non-potable supply, protection of water quality is a primary regulatory objective. Numeric objectives with the Basin Plan incorporate the SWRCB Maximum Contaminant Levels (MCL) for drinking water constituents, including nitrate, total dissolved solids (TDS), volatile organic compounds (VOC), and other regulated contaminants. While other regulatory language prohibits discharges that cause or threaten to cause degradation, contamination, or nuisance conditions in groundwater.

County of Orange MS4 Permit, Drainage Area Management Plan, and Local Implementation Plans

In May 2009, the Santa Ana RWQCB re-issued the North Orange County MS4 Storm Water Permit as WDR Order R8-2009-0030 (NPDES Permit No. CAS618030), as amended by Order R8-2010-0062, to the County of Orange, the incorporated cities of Orange County, and the Orange County Flood Control District in the Santa Ana Region. Pursuant to this “fourth term” MS4 permit, the co-permittees were required to update and implement a drainage area management plan (DAMP) for its jurisdiction as well as local implementation plans (LIP), which describe the co-permittees’ urban runoff management programs for their local jurisdictions.

Under the City’s LIP, land development policies pertaining to hydromodification and low impact development (LID) are regulated for new developments and significant redevelopment projects. The term “hydromodification” refers to the changes in runoff characteristics from a watershed caused by changes in land use condition. More specifically, hydromodification refers to “the change in the natural watershed hydrologic processes and runoff characteristics (i.e., interception, infiltration, overland flow, interflow and groundwater flow) caused by urbanization

or other land use changes that result in increased stream flows and sediment transport." The use of LID BMPs in project planning and design is to preserve a site's predevelopment hydrology by minimizing the loss of natural hydrologic processes such as infiltration, evapotranspiration, and runoff detention. LID BMPs try to offset these losses by introducing structural and non-structural design components that restore these water quality functions into the project's land plan. These land development requirements are detailed in the County-wide Model Water Quality Management Plan (WQMP) and Technical Guidance Document (TGD), last updated in 2013, which cities have incorporated into their discretionary approval processes for new development and redevelopment projects.

The LID hierarchy requires new developments and re-developments to implement BMPs as described in the TGD. The LID hierarchy requires new projects to first attempt to infiltrate if feasible, then harvest and reuse, then biofilter stormwater runoff from their project site, depending on site constraints. New projects and redevelopments in the City will follow the set hierarchy of BMP selection, and more runoff throughout the City will be effectively treated as development occurs.

A project WQMP shall be submitted for new development and significant redevelopment projects in the City of Costa Mesa. Project WQMPs describe how property owners/managers will comply with the post construction water quality requirements described in the City's NPDES permit (issued by the Santa Ana RWQCB). Project plans submitted for plan check must be consistent with the approved project WQMP, and the project WQMP must be approved prior to the issuance of building or grading permits.

Mesa Water District Standard Specifications and Standard Drawings for the Construction of Water Facilities

The purpose of these design specifications and requirements is to provide developers (applicant) and their agents with the general steps for procuring a water service from Mesa Water District as well as providing the general design requirements for the preparation and processing of water improvement plans for a new water service from Mesa Water. Section 01570, Storm Water Pollution Prevention Plan, explains the process of preparing a site-specific SWPPP for projects that disturb more than one acre of land (Mesa Water 2018).

LOCAL

City Of Costa Mesa Storm Drain Master Plan Update (2022 – 2026)

In 2021, the City updated their storm drain master plan and storm drain connection fees. The Existing Conditions Assessment Report (ECAR) was completed in 2022 and ultimately approved by the City in October 2024. The ECAR consisted of a city-wide hydraulic model to analyze existing conditions for 10-year, 25-year and 100-year storm events. The modeling results were compared against known flooding events to ensure an accurate model. The ECAR did not

identify any high priority storm drain improvements associated with the area of the FDCSP including those city-owned storm drains north and south of the project site.

Phase II of the storm drain master plan update included the development of the Proposed Drainage and Water Quality Improvements report to identify additional details on the highest priority improvements, locations, design details, cost estimates and opportunities for regional stormwater BMP projects for stormwater and water quality benefits. This report was also approved by the City in October 2024. Similar to the ECAR, the Phase II report concluded there are no high priority storm drain improvements or regional BMPs associated with the FDCSP area.

Phase III of the storm drain master plan update included the Storm Drainage Impact Fee Nexus Study prepared in February 2026. The City Council introduced an ordinance and recommended fee adoption on April 7, 2026 as the final component of the 2024 Storm Drain System Master Plan update (Costa Mesa 2026). The updated fee study identifies different drainage fees for the Santa Ana Watershed compared to the Newport Bay Watershed. The FDCSP falls within the Santa Ana Watershed and would be subject to the updated fees associated with this watershed. The proposed fees would be based on a fee per impervious acre in relation to different land use types (Appendix K.1).

City of Costa Mesa Local Hazard Mitigation Plan

The Costa Mesa Local Hazard Mitigation Plan (LHMP) provides a comprehensive assessment of the threats that the City faces from natural and human-caused hazard events (such as dam failure, flooding, and seiches) and then coordinates strategy to reduce these threats. The LHMP identifies resources and information to help community members, City staff, and local officials understand local threats and make informed decisions. The LHMP can also support increased coordination and collaboration between the City, other public agencies, local employers, service providers, community members, and other key stakeholders (Costa Mesa 2022).

City of Costa Mesa General Plan

The Conservation Element and Safety Element of the City of Costa Mesa General Plan identify policies regarding water quality, urban runoff, and tsunami and dam hazards. The following policies apply to the proposed project.

Conservation Element

- **Policy CON-3.A.5.** Work with public and private property owners to reduce stormwater runoff in urban areas to protect water quality in storm drainage channels, the Santa Ana River, and other local water courses that lead to the Pacific Ocean.
- **Policy CON-3.A.6.** Continue to develop strategies to promote stormwater management techniques and storm drain diversion programs that collectively and naturally filter urban runoff.

- **Policy CON-3.A.7.** Continue to comply with the National Pollutant Discharge Elimination System Program (NPDES) by participating in the Countywide Drainage Area Management Plan (DAMP), which stipulates water quality requirements for minimizing urban runoff and discharge from new development and requires the provisions of applicable Best Management Practices (BMP).
- **Policy CON-3.A.8.**Require that all applicable development projects be reviewed with regards to requirements of both the on-site Water Quality Management Plan and State requirements for runoff and obtaining a Storm Water Pollution Prevention Plan (SWPPP) permit.

Safety Element

- **Policy S-1.14.** Minimize flood hazard risks to people, property, and the environment by addressing potential damage tsunamis and sea level rise.
- **Policy S-1.16.**Develop emergency response, early warning notification, and evacuation plans for areas that are within dam inundation areas, where feasible.

City of Costa Mesa Municipal Code

Title 8, Chapter 3, Water Quality

The City's Municipal Code addresses hydrology and water quality issues through Title 8, Chapter 3, in particular, Section 8-32, Control of Urban Runoff, Part(a): New development and significant redevelopment, which states:

1. All new development and significant redevelopment within the City of Costa Mesa shall be undertaken in accordance with:
    i. The Drainage Area Management Plan, including but not limited to the Development Project Guidance; and
    ii. Any conditions and requirements established by the development services department and the public services department which are reasonably related to the reduction or elimination of pollutants in storm water runoff from the project site.

The City has adopted the 2025 California Building Code and other applicable codes pursuant to this Chapter.

Title 13, Chapter 5, Development Standards, Article 10

The floodway and floodplain districts and regulations are intended to be applied to those areas of the City which, under present conditions, are subject to periodic flooding and accompanying hazards. The objectives of the floodway and floodplain districts include:

a. Prevention of loss of life and property and minimization of economic loss caused by flood flows,

b. Establishment of criteria for land management and land use in flood-prone areas that are consistent with the criteria promulgated by the Federal Emergency Management Agency for the purpose of providing flood insurance eligibility for property owners,

Prohibition of encroachments, new construction or other improvements or development that would obstruct or divert the flow of floodwaters within a regulatory floodway, and

c. Regulation and control of use of land below the elevation of the design flood flow within the remainder of the floodplain.

Title 13, Chapter 7, Landscaping Standards

This chapter aims to establish standards for landscape and irrigation design, installation, water conservation, and maintenance, with several key objectives. The chapter outlines the necessity for landscape designs that protect public health and safety by reducing physical and visual pollution, minimizing erosion, and improving overall urban conditions. Specific recommendations include the integration of canopy trees in parking lots and a reduction in palm tree usage. The guidelines advocate for the adoption of drought-tolerant materials and low-flow irrigation systems, aligning with the State Assembly Bill 1881 and the State Model Water Efficient Landscape Ordinance. The chapter also promotes landscaping practices that conserve regional water resources and details procedural guidance for project applicants via the "Water Efficient Landscape Guidelines," which apply to all projects except in the R-1 (single-family residential) district.

3.9.2 Existing Conditions

REGIONAL AND LOCAL DRAINAGE

As shown in Figure 3.9-1, *Watersheds*, the project site is in the Lower Santa Ana River Watershed. The Lower Santa Ana River is an engineered channel that discharges directly to the Pacific Ocean at about 0.5 miles southeast of Brookhurst Street, at the boundary of Newport Beach and Huntington Beach.

The City of Costa Mesa has four watershed designations in the City: West, North, and East Watersheds, and the East Watershed has northern and southern subareas. The project site is located in the West Watershed. Runoff from the project site drains primarily to the existing City-owned Costa Mesa Golf Course, which surrounds the southern, eastern, and western boundaries of the property. The existing FDCSP storm drain system discharges to a 36-inch pipe at the northwest corner of the property, which conveys runoff to the west and through the Costa Mesa County Club golf course. The runoff from the project site is ultimately conveyed to

the Orange County Flood Control District's (OCFCD) Fairview Channel (OCFCD Facility No. D04). The Fairview Channel continues to convey the runoff westerly through Fairview Park, crosses under Placentia Avenue, and discharges into the OCFCD Greenville-Banning Channel at about 0.5 miles west of Placentia Avenue. The runoff is conveyed in the Greenville-Banning Channel before merging with the Santa Ana River and ultimately discharging into the Pacific Ocean.

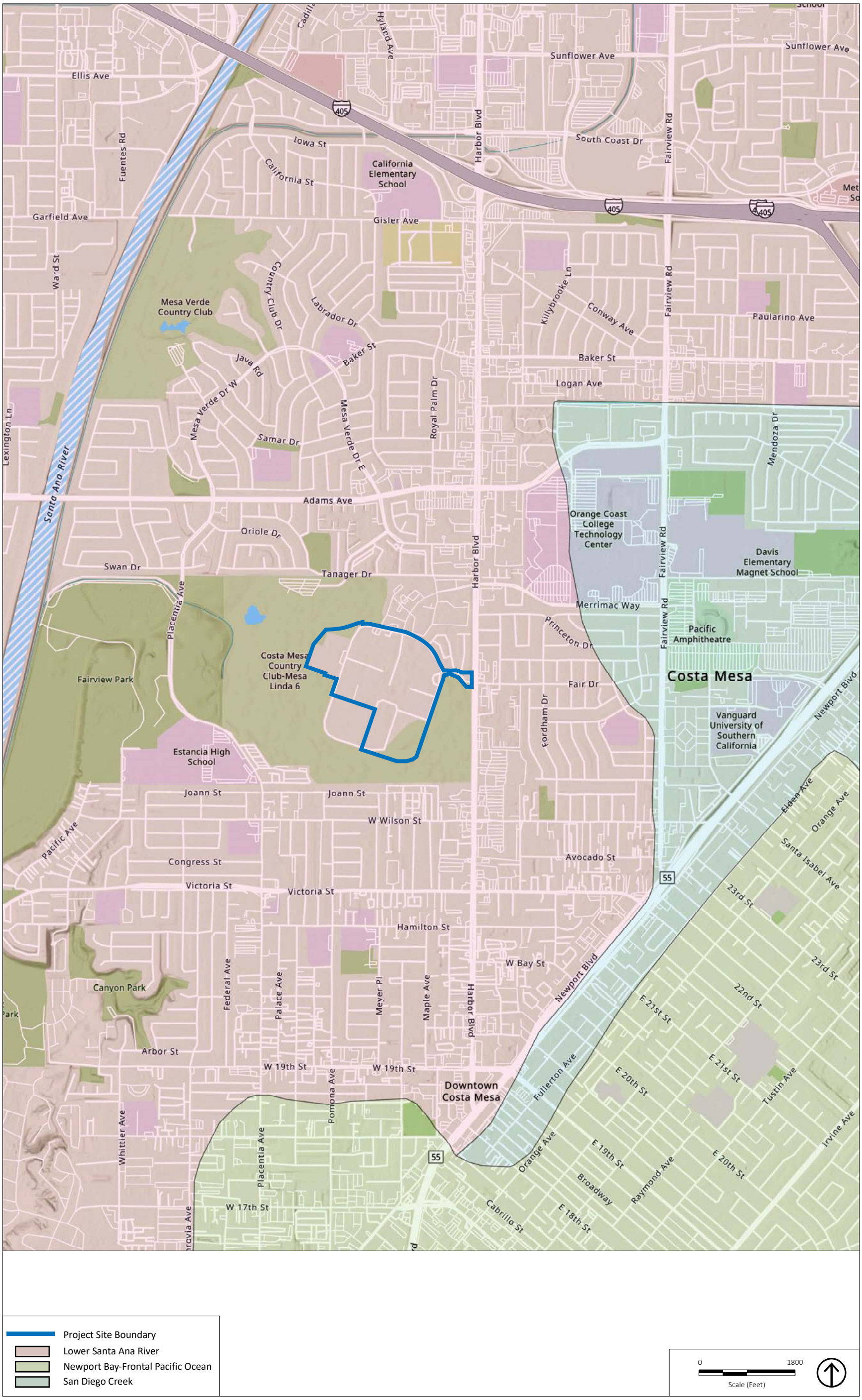
The Infrastructure Report for the proposed project (see Appendix K.1) identified several off-site drainage issues, including a damaged portion of the 36-inch storm drain west of the project site and localized flooding during large storm events in a concrete swale before the construction of the Fairview Channel in 2023. The City of Costa Mesa confirmed that the existing storm drain systems to the south and west of the project site do not have sufficient capacity for a direct piped connection from the project site, and that proposed drainage patterns should remain consistent with existing conditions. To address the off-site drainage issues, the City of Costa Mesa has required the project to meet the following conditions before project implementation:

- Condition analysis (CCTV) of the existing 36-inch storm drain that accepts drainage from the FDSCP and Southern Regional Emergency Operations Center (SREOC) site;
- Replacement of the corrugated metal pipe portion of the storm drain with reinforced concrete pipe;
- Realign the 36-inch storm drain to avoid the lake (on golf course);
- Determine capacity of the existing 36-inch storm drain;
- Proposed condition 25-year peek flow to match existing 25-year peak flow, including on-site detention if necessary; and
- Prepare detailed hydrology and hydraulics report for City review and approval, based on the approved site plan.

SURFACE WATER QUALITY

The project site drains to the existing City and County storm drain system, which conveys flows to the Fairview Channel (OCFCD Facility D04), then to the Greenville-Banning Channel (D03), and ultimately to Santa Ana River Reach 1, which discharges directly to the Pacific Ocean. The project site is in the Santa Ana River Watershed, and all stormwater discharges are regulated under the regional Orange County MS4 Permit, issued and administered by the Santa Ana RWQCB. Compliance with applicable regional water quality objectives and Basin Plan requirements is required under the MS4 Permit.

Santa Ana River Reach 1 is not listed as impaired and has no associated TMDLs. Therefore, no pollutant-specific load allocations or TMDL compliance requirements apply to the project with respect to Santa Ana River Reach 1. Although no TMDLs currently apply to the project's receiving water bodies, the proposed project discharges would remain subject to regional MS4 Permit requirements, Basin Plan objectives, and local stormwater quality standards.



Source: FUSCOE 2026.

Figure 3.9-1
Watersheds

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GROUNDWATER

The project site is in the OC Basin, which is adjudicated and managed by the OCWD. OCWD conducts basinwide monitoring, recharge, and groundwater quality protection programs in coordination with local retail water agencies, including Mesa Water. A network of nearly 700 wells provides OCWD with samples, which are tested for a variety of purposes. OCWD collects 600 to 1,700 samples each month to monitor basin water quality. These samples are collected and tested according to approved federal and State procedures as well as industry-recognized quality assurance and control protocols.

Water Quality Objectives

Mesa Water operates groundwater production wells within its service area, and extracted groundwater is treated prior to distribution to ensure compliance with State drinking water standards.

According to recent OCWD monitoring data, groundwater associated with the Mesa Water service area has average TDS concentrations of approximately 301 milligrams per liter (mg/L), which is below the State secondary MCL of 500 mg/L. Reported nitrate concentrations are approximately 0.4 mg/L, which is well below the primary MCL of 10 mg/L. These values demonstrate the region's compliance with applicable drinking water standards for regulated pollutants. Additionally, OCWD conducts ongoing basin wide monitoring for additional regulated and emerging constituents, including VOCs and per- and polyfluoroalkyl substances (PFAS). Where necessary, treatment or operational measures are implemented to maintain compliance with State and federal regulatory requirements and Basin Plan water quality objectives.

FLOOD HAZARDS

Designated Flood Zones

According to FEMA's Flood Zones map (Map #06059C0266J), the entire project site is within Zone X (FEMA 2023). Zone X is defined as the area determined to be outside the 100-year or 500-year flood, and flood insurance is not required. Although the project site is not subject to flooding from FEMA floodways, localized ponding can still occur during large rain events due to on-site low areas, or sumps, along with the inadequacy of existing off-site drainage facilities. Figure 3.9-2, *FEMA Flood Zones*, shows the localized ponding west of the project site.

Seismically Induced Dam Inundation

Inundation occurs when there is a break in a dam and water is released, washing downstream and causing flooding. While such events are extremely rare, they have occurred in California, and climate change may increase the risk by causing more intense storms that could cause reservoirs to exceed their design capacity. According to the Department of Water Resources'

Dam Breach/Inundation map and the City's LHMP, the project site is not within or near a dam with a risk of failure or an inundation zone (DWR 2023; Costa Mesa 2016).

Seiches

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. The absence of any large bodies of water in Costa Mesa and the location of high bluffs adjacent to Newport Bay reduce the possibility of damage from seiche effects (Costa Mesa 2016). No surface water bodies pose a flood hazard to the project site due to a seiche. The closest water body to the project site is the Santa Ana River, which is approximately one-mile to the west.

Tsunamis

A tsunami is an ocean wave caused by a sudden displacement of the ocean floor, most often due to earthquakes. The project site is not at risk of flooding from tsunami because it is approximately three miles northeast of the ocean. As shown in the Safety Element for the City, the project site is not within a tsunami hazard zone (Costa Mesa 2016).

3.9.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to hydrology if it would:

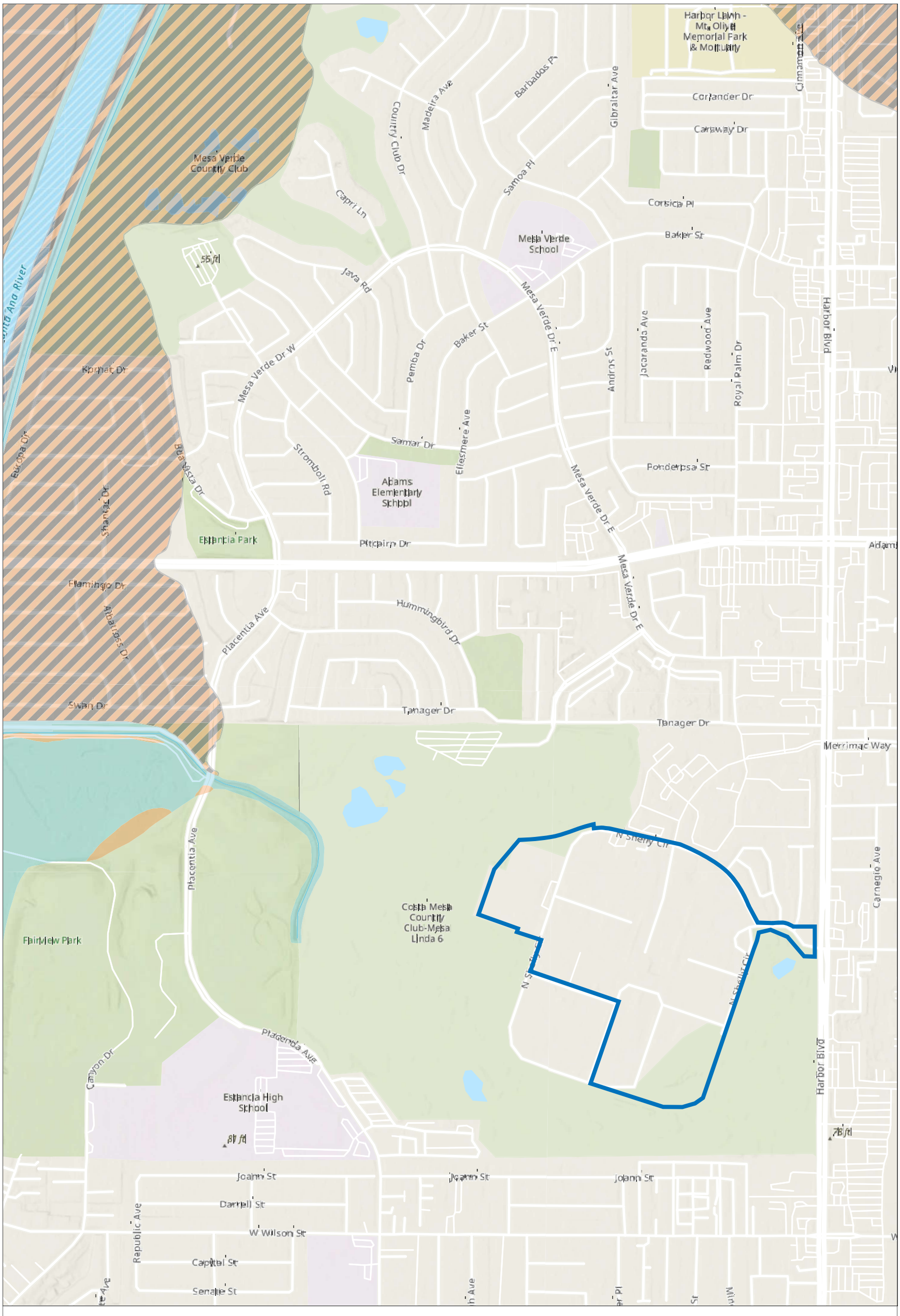
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

    i) Result in a substantial erosion or siltation on- or off-site.

    ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.



Source: FUSCOE 2026.

Figure 3.9-2
FEMA Flood Zones

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iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

iv) Impede or redirect flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.9.4 Project Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

CONSTRUCTION

Construction activities within the project site could potentially result in soil erosion and temporary adverse impacts to surface water quality from construction materials and wastes.

Implementation of State and local regulations would effectively mitigate stormwater runoff impacts from the proposed land use changes that take place during construction. Standard erosion control practices are implemented for all construction in the City. Additionally, construction sites over one acre would be required to prepare and implement a SWPPP in accordance with the requirements of the Statewide CGP (Order WQ 2022-0057-DWQ) and are subject to the oversight of the Santa Ana RWQCB. The CGP also requires that prior to the start of construction activities, the project developer must file PRDs with the SWRCB, which include a Notice of Intent risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is always required to maintain a copy of the SWPPP at the construction site and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the issuance of a grading permit, the project developer is required to provide proof of filing the PRDs with the SWRCB. In addition, due to the size of the proposed land use, phases of development are anticipated. Each phase of development would result in phasing of construction. Each phase of construction would require permit coverage from demolition to final completion as identified in the Notice of Termination conditions of the CGP.

Categories of potential BMPs that would be implemented for the proposed project are described in Table 3.9-1, *Construction Best Management Practices*. The final BMPs to be implemented for the proposed project would be determined through the City's review of the

SWPPP, which would occur during the City's development review and building plan check process.

Table 3.9-1 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls	Protects the soil surface and prevents soil particles from being detached by rainfall, flowing water, or wind.	Scheduling, preserving existing conditions, mulch, soil binders, geotextiles, mats, hydroseeding, earth dikes, swales, velocity dissipating devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non vegetative stabilization.
Sediment Controls	Traps soil particles after they have been detached and moved by rain, flowing water, or wind.	Barriers such as silt fences, straw bales, sandbags, fiber rolls, and gravel bag berms; sediment basins; sediment traps; check dams; storm drain inlet protection; compost socks and berms; biofilter bags; manufactured linear sediment controls; and cleaning measures such as street sweeping and vacuuming
Wind Erosion Controls	Minimizes dust nuisances.	Applying water or other dust palliatives to prevent or minimize dust nuisance, reducing soil-moving activities during high winds, and installing erosion control BMPs for temporary wind control.
Tracking Controls	Prevents or reduces the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits and entrance/outlet tire wash.
Non-Storm Water Management Controls	Prevents pollution by limiting or reducing potential pollutants at their source or eliminating off-site discharge. Prohibits illicit connections or discharges	Water conservation practices, BMPs specifying methods for: dewatering operations; temporary stream crossings; clear water diversions; pile driving operations; temporary batch plants; demolition adjacent to water; materials over water; potable water and irrigation; paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Proper material delivery and storage and material use, spill prevention and control, stockpile management, contaminated soil management, and management of solid, concrete, sanitary/septic, liquid, and hazardous wastes.

In addition, Section 8-32, Control of Urban Runoff, of the Costa Mesa Municipal Code mandates that all new development Costa Mesa adhere to the Drainage Area Management Plan, which includes the Development Project Guidance and other regulations.

Implementation of these State and local requirements would effectively prohibit projects from violating any water quality standards or waste discharge requirements resulting from construction activities. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

OPERATION

Once the proposed project has been constructed, urban runoff could include a variety of contaminants, typical of a mixed-use development, that could impact water quality. Runoff from buildings and parking areas typically contain oils, grease, and fuel; antifreeze; by-products of combustion (such as lead, cadmium, nickel, and other metals); fertilizers, herbicides, and pesticides; and other pollutants. Precipitation at the beginning of the rainy season may result in an initial stormwater runoff (first flush) with high pollutant concentrations.

The incorporation of site design, LID features and BMPs as required under the County of Orange MS4 Permit implemented by the City of Costa Mesa, are designed to protect surface waters and groundwater. The redevelopment of the existing project site into the proposed higher density residential land uses would result in improvement to water quality runoff based on the implementation of water quality BMPs that likely do not exist under current conditions. The project WQMP would incorporate all the post-construction LID BMPs and is subject to City review and approval.

As part of the site design, the landscaping shall be provided throughout the proposed project to enhance stormwater. Furthermore, the project proposes that existing trees removed during development be replaced on-site at a ratio of two new trees for every one tree that is removed.

Based on preliminary investigations, infiltration is feasible, although full infiltration versus partial infiltration would be determined based on site-specific testing locations. Infiltration BMPs are anticipated and would likely be incorporated into the on-site detention requirements. Development on the project site would effectively retain or treat the 85th-percentile 24-hour stormwater runoff for pollutants, such as bacteria, metals, nutrients, oil and grease, organics, pesticides, sediment, trash, and oxygen demanding substances prior to discharge off the property. Opportunities exist to include one large regional stormwater and water quality BMP at the northwest corner of the project site to handle all detention and water quality requirements for the proposed development, or each phase of development can be designed to handle their respective detention and water quality components. This would be evaluated by the master developer.

Through compliance with applicable stormwater regulations and incorporation of required LID features and BMPs, the proposed project would not violate water quality standards or waste discharge requirements and would not substantially degrade surface or groundwater quality. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

CONSTRUCTION

The proposed project would allow for the development of up to 4,000 dwelling units, 35,000 square feet of commercial uses, and approximately 14 acres of open space. Although the project site is currently fully developed with the FDC, construction activities would involve grading and excavation in these areas. As discussed in Section 3.6, *Geology and Soils*, the Phase II site investigation soil borings did not encounter groundwater within 15 feet of the ground surface. As a result, groundwater is not expected to be encountered during excavation, and dewatering would not be required. Therefore, construction of the proposed project would not substantially decrease groundwater supplies or substantially interfere with groundwater recharge such that it would impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction would be **less than significant.**

OPERATION

The project site is in the Mesa Water District water service area. Mesa Water's water supply is obtained entirely from local groundwater from the OC Basin. Recycled water is from the OCWD. Imported potable water supply is obtained from its regional wholesaler, Municipal Water District of Orange County (MWDOC) as an emergency backup. Mesa Water's groundwater supply is obtained entirely from the OC Basin through seven clear wells with the ability to pump from the principal aquifer system and two amber-tinted-water wells that pump from the deep aquifer system. The combined pumping capacity of all groundwater wells is 37,420 acre-feet per year (AFY).

Mesa Water District's 2020 Urban Water Management Plan did not consider the proposed project. The 2020 UWMP determined "Mesa Water District is projected to meet full-service demands through 2045 for the same scenarios." However, because the proposed project's water demand was not included in the 2020 UWMP, a Water Supply Assessment (WSA) was required to determine if Mesa Water District would have adequate water supply for the next 20 years to accommodate the proposed project.

The WSA determined that the proposed project would result in an average daily water demand of 862 AFY (see Appendix G.1). The WSA determined that either with or without the proposed project, Mesa Water District's projected water demand does not expect to have a water supply shortage during normal water years, single dry year, or multiple dry years over the next 20 years. Therefore, proposed project water demands would not be expected to substantially deplete groundwater supplies.

The Basin Plan's numeric and legislative water quality standards apply to surface and groundwater in the OC Basin, and as discussed above, existing surface and groundwater quality is in compliance with standards. Overall, the proposed project does not propose activities that would introduce pollutants directly to groundwater or surface waters. The proposed project would comply with stormwater management, MS4 permit requirements, and LID BMP standards intended to prevent surface and groundwater contamination. Therefore, implementation of the proposed project would not degrade groundwater quality or interfere with ongoing surface and groundwater management within the OC Basin. Furthermore, the project site is not on an active recharge site and therefore would not substantially interfere with groundwater recharge. Operation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, impacts on groundwater supply and recharge would be **less than significant.**

Significance without Mitigation: Less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:

i) Result in a substantial erosion or siltation on- or off-site?

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

iv) Impede or redirect flood flows?

EROSION OR SILTATION ON- OR OFF-SITE

The project site is in an urbanized and built-out portion of the City where soils have already been disturbed by existing development. No streams or rivers traverse or are in the vicinity of the project site, which is already developed and largely flat. Soils could experience erosion

during construction of future redevelopment allowed under the proposed project. However, as mentioned above, a SWPPP specifying BMPs for minimizing pollution of stormwater with soil and sediment during development would be prepared and implemented. In addition, Section 8-32(a)(1), Control of Urban Runoff, of the Costa Mesa Municipal Code mandates that all new development in the City adhere to the Drainage Area Management Plan, which encompasses the Development Project Guidance and other regulations. Adherence to the BMPs in the SWPPP and local regulations would reduce, prevent, or minimize soil erosion from grading and construction activities. Therefore, impacts related to substantial soil erosion or siltation during construction would be **less than significant.**

FLOODING ON- OR OFF-SITE

As shown in Figure 3.9-2, localized ponding occurs west of the project site. According to FEMA's Flood Insurance Rate Map, the entire project site is in Zone X, outside the 100-year and 500-year floodplains, and flood insurance is not required. Although the project site is not subject to flooding from FEMA-designated floodways, localized ponding may occur during large rain events due to on-site low areas and the limited capacity of existing off-site drainage facilities. However, development of the proposed project would include construction of a new on-site stormwater drainage system designed to accommodate project-related runoff and convey flows to the existing off-site storm drain system. Although the existing off-site storm drain system to the south and west of the project site do not have sufficient capacity for a direct piped connection from the project site, the proposed project would be required to implement the conditions listed above. Under the proposed conditions, the existing drainage patterns would be maintained, and runoff would be directed to a newly designed storm drain system at the northwest corner of the site. And to address off-site drainage capacity concerns, the City is requiring measures to improve the condition of the 36-inch storm drain west of the site, including a detailed hydrology and hydraulics study to be reviewed by the City.

With implementation of the proposed on-site and off-site drainage improvements, the project would not create or exacerbate flooding conditions on- or off-site. Therefore, impacts related to flooding would be **less than significant.**

Stormwater Drainage Systems or Polluted Runoff

Under the existing conditions, the project site is fully developed with established drainage patterns, stable surface and soil conditions, and an on-site storm drain system. Under the proposed conditions, drainage patterns would largely be maintained and would direct flows via a newly designed storm drain system to the northwest corner of the project site as occurs under existing conditions. The proposed storm drain system would connect to an existing 36-inch storm drain that would deliver flows under the golf course and to the OCFCD flood control concrete channel before discharging into the Santa Ana River. The proposed project would match the existing 25-year peak flow rate through on-site detention and increase flow erosion

on or off-site. As previously mentioned, measures are also in place to verify the condition of the 36-inch storm drain, including hydraulic capacity, structural integrity, modified alignment, and replacement of the corrugated metal pipe with reinforced concrete pipe.

Additionally, development in accordance with the proposed project must be operated in accordance with the County of Orange MS4 Permit and Section 8-32, Control of Urban Runoff, of the Costa Mesa Municipal Code as mentioned in Impact a, above. Therefore, impacts would be **less than significant.**

Impede or Redirect Flood Flows

Implementation of the proposed project would not alter the course of any stream or river or introduce structures within a floodway that could impede or redirect flood flows. As described above, the proposed project would include construction of a new on-site storm drain system to convey stormwater runoff to the existing off-site storm drain system. The proposed drainage improvements would be designed to maintain existing drainage patterns and manage runoff flows consistent with existing conditions. Because the project site is not in a flood hazard area and the proposed drainage system would be designed to safely convey stormwater runoff without obstructing regional drainage infrastructure, the proposed project would not impede or redirect flood flows. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project site is not in a dam inundation zone and therefore would not be subject to flooding from seismically induced dam failure. As shown in Figure 3.9-2, the project site is not in a 100-year or 500-year flood zone. Additionally, no nearby inland water bodies pose a seiche hazard, and the closest water body, the Santa Ana River, is approximately one mile west of the project site. The project site is also not at risk from tsunamis because it is three miles inland from the ocean and outside mapped flood hazard areas. Therefore, the project site is not subject to flooding hazards associated with flood zones, dam failure, seiches, or tsunamis. Impacts are **less than significant.**

Significance without Mitigation: Less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The proposed project would comply with the State CGP, including preparation and implementation of a SWPPP, and would adhere to applicable provisions of the City's Municipal Code. These requirements would ensure that construction-related activities do not adversely

affect surface water or groundwater quality. During project operation, implementation of LID and BMPs in the project WQMP would reduce pollutants in stormwater runoff and promote infiltration, consistent with regulatory requirements. As a result, the project would not obstruct or conflict with the implementation of the Basin Plan.

As mentioned, the project site is in the OC Basin, an adjudicated basin managed by the OCWD. OCWD oversees groundwater recharge, extraction, and water quality through basinwide monitoring and management programs conducted in coordination with local water agencies, including Mesa Water District. The proposed project would not interfere with OCWD's groundwater management activities. Project design would incorporate LID and BMPs to promote infiltration and protect water quality, and any infiltration features would be subject to applicable review and regulatory requirements. All development within the City is subject to the Santa Ana RWQCB's MS4 permit, which regulates stormwater discharges and requires implementation of water quality protection measures. In addition, projects incorporating infiltration would be reviewed for consistency with groundwater management objectives.

Because the proposed project would comply with applicable regulatory requirements and would not interfere with ongoing groundwater management or water quality protection programs, it would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be **less than significant.**

Significance without Mitigation: Less than significant.

3.9.5 Cumulative Impact Analysis

The cumulative geographic context for hydrology and water quality includes the City of Costa Mesa and surrounding areas in the Lower Santa Ana River Watershed (see Figure 3.9-1), which is part of the larger Santa Ana River Watershed. In addition, the project site and surrounding area overlie the OC Basin.

Cumulative projects consist primarily of infill development and redevelopment identified in the City's cumulative project list, including projects within and adjacent to the project site and the SREOC. These projects would contribute runoff to the same watershed and rely on the same groundwater basin and are therefore relevant to the cumulative analysis. All such projects are subject to applicable federal, State, and local regulations governing stormwater quality and groundwater management.

Would the project have a cumulative effect related to hydrology or water quality?

HYDROLOGY AND DRAINAGE

Cumulative projects within the Lower Santa Ana River Watershed could increase impervious surface areas and, consequently, increase local runoff rates at individual project sites. However, projects within the watershed, both within and outside the City, would be required to manage stormwater runoff in accordance with applicable NPDES permits, including the regional MS4 permit, or equivalent permits issued by the Santa Ana RWQCB or other applicable regulatory agencies. These requirements include implementation of site design, source control, and treatment control BMPs, including LID measures, to maintain or reduce post-development runoff rates and volumes to the extent feasible.

In addition, projects in the City would be required to comply with applicable municipal code provisions and drainage design standards (Title 13, Chapter 5), and projects outside the City would be subject to similar local agency requirements governing drainage and flood control. As a result, cumulative development would not be expected to substantially alter regional drainage patterns or result in significant flooding or drainage impacts. Accordingly, cumulative drainage impacts would be **less than significant**, and the proposed project's contribution would not be cumulatively considerable.

Significance without Mitigation: Less than significant.

WATER QUALITY

Cumulative projects have the potential to generate pollutants during both construction and operation. Construction activities that disturb one acre or more would be required to prepare and implement SWPPPs to obtain coverage under the State CGP. These plans include erosion and sediment control measures to minimize pollutant discharges during construction.

During operation, projects within the watershed would be required to implement LID BMPs and other stormwater treatment measures in compliance with the MS4 permit. In addition, projects within the City would be required to comply with applicable municipal code provisions (Title 8, Chapter 3), and projects outside the city would be subject to similar local agency requirements governing water quality. These measures are designed to reduce pollutants in stormwater runoff and protect receiving water quality.

Because all cumulative projects would be subject to these regulatory requirements, cumulative water quality impacts would not be significant. The proposed project would comply with the same standards and would not contribute to a cumulatively considerable impact. Therefore, cumulative impacts to water quality would be **less than significant.**

Significance without Mitigation: Less than significant.

3.9.6 References

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SWRCB (State Water Resources Control Board). 2026a. Welcome to the Construction Stormwater Program. https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html.

SWRCB. 2026b. Storm Water Program: Trash Implementation Program. https://www.waterboards.ca.gov/water_issues/programs/stormwater/trash_implementation.html.

3.10 LAND USE AND PLANNING

This section of the DEIR evaluates the potential impacts of the Fairview Developmental Center Specific Plan (proposed project) on land use and planning conditions of the project site and vicinity. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary.

Notice of Preparation Comments

The City received two comment letters for the Notice of Preparation (NOP) regarding land use and planning. A letter from the Southern California Association of Governments (SCAG) on November 20, 2025, recommends a consistency analysis with SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), known as Connect SoCal, and inclusion of project-level mitigation measures. A letter from Costa Mesa First on December 5, 2025, requested that the DEIR illustrate consistency with the City's General Plan.

For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the comment letters.

3.10.1 Regulatory Framework

FEDERAL

No federal land use regulations are applicable to the proposed project.

STATE

California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, Sections 65000 through 66499.58. Under State of California planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how they create a general plan, but some fundamental requirements must be met. These requirements include seven mandatory elements described in the Government Code, including an element on land use. Each of the elements must contain text and descriptions with objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures (CA Legislative Info. 2025).

REGIONAL

Southern California Association of Governments

Under federal law, the Southern California Association of Governments (SCAG) is designated as a metropolitan planning organization (MPO); under State law it is a regional transportation planning agency and council of governments (COG) for the County of Los Angeles, including the project site. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles (SCAG 2025b). The agency develops long-range RTPs, including Sustainable Communities Strategies (SCS) and growth forecast components; regional transportation improvement programs; RHNA allocations; and a portion of the South Coast Air Quality Management District's air quality management plans.

The Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) is a long-range regional plan that identifies strategies that provide efficient movement of people, goods, and information; enhance economic growth and international trade; and improve the environment and quality of life (SCAG 2024). The RTP/SCS must lay out a plan to meet the region's transportation, housing, economic, and environmental needs in a way that enables the region to lower greenhouse gas (GHG) emissions. As part of the RTP/SCS, the Southern California Association of Governments (SCAG) develops population and housing forecasts for the SCAG region and for the jurisdictions that make up the SCAG region.

SCAG adopted its current RTP/SCS, "Connect SoCal 2024," in April 2024. The document provides the long-range vision for the SCAG region (SCAG 2024). Connect SoCal 2024 expands land use and transportation strategies established in previous cycles of the RTP/SCS to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal 2024 contains plans and projections for the region's future. Like other RTPs/SCSs, Connect SoCal 2024 provides a policy framework for preparing local plans and handling issues of regional significance, such as land use and housing, open space and biological habitats, water, energy, air quality, solid waste, transportation, security and emergency preparedness, economy, and education. Connect SoCal 2024 also strives to achieve broader regional objectives, such as encouraging diverse housing construction in areas supported by multiple transportation options; promoting development of complete streets that prioritize safe opportunities to walk, bike, and pursue other forms of active transportation; leveraging new transportation technologies and data-driven solutions to efficient travel; and promoting conservation of natural lands. Connect SoCal 2024 advances regional planning by incorporating an integrated approach between SCAG, state and local governments, transportation commissions, resources agencies and conservation groups, the private sector, and the general public (SCAG 2024).

LOCAL

City of Costa Mesa General Plan

The Costa Mesa General Plan provides the basis for the City's policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide development and conservation through 2035. Key policies of the General Plan relevant to this chapter's analysis of the proposed project's potential land use and planning impacts are included below. The set of policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection of policies relevant to the impact discussion in this chapter.

Land Use Element

Land Use Goal LU-1: A Balanced Community with a Mix of Land Uses to Meet Resident and Business Needs

- **Policy LU-1.1**. Provide for the development of a mix and balance of housing opportunities, commercial goods and services, and employment opportunities in consideration of the needs of the business and residential segments of the community.
- **Policy LU-1.2**. Balance economic gains from new development while preserving the character and densities of residential neighborhoods.
- **Policy LU-1.3**. Strongly encourage the development of residential uses and owner-occupied housing (single-family detached residences, condominiums, townhouses) where feasible to improve the balance between rental and ownership housing opportunities.
- **Policy LU-1.4**. Promote housing and employment opportunities within planned development areas to the extent feasible.
- **Policy LU-1.5**. Maintain a land use structure that strives to balance jobs and housing with available infrastructure and public and human services.

Land Use Goal LU-2. Preserve and Protect Residential Neighborhoods

- **Policy LU-2.7.** Permit the construction of buildings over two stories or 30 feet only when it can be shown that the construction of such structures will not adversely impact surrounding developments and deprive existing land uses of adequate light, air, privacy, and solar access.
- **Policy LU-2.8.** Limit building height to four stories above grade south of the I-405 Freeway, except for special purpose housing such as elderly, affordable, or student housing, unless otherwise approved by a General Plan amendment. (A four-story/five-level parking structure with roof deck parking on the fifth level is considered a four-story structure.) The height limitation may be increased further to realize the residential site capacity, or density, of housing opportunity sites identified within the sites inventory of the Housing Element.

- **Policy LU-2.9**. Require appropriate building setbacks, structure orientation, and placement\ windows to consider the privacy of adjacent residential structures within the same project and on adjacent properties.

Land Use Goal LU-3: Development that Maintains Neighborhood Integrity and Character

- **Policy LU-3.5**. Provide opportunities for the development of well-planned and designed projects which, through vertical or horizontal integration, provide for the development of compatible residential, commercial, industrial, institutional, or public uses/ within a single project or neighborhood.
- **Policy LU-3.8**. Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development and surrounding residential neighborhoods.
- **Policy LU-3.9**. Locate high-intensity developments or high-traffic-generating uses away from low-density residential in order to buffer the more sensitive land uses from the potentially adverse impacts of the more intense development or uses.
- **Policy LU-3.12**. Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development.

Land Use Goal LU-5: Adequate Community Services, Transportation System, and Infrastructure to Meet Growth.

- **Policy LU-5.6:** Promote development of revenue-generating land uses to help defray the costs of high quality public services.
- **Policy LU-5.7**: Encourage new development that is organized around compact, walkable, mixed-use neighborhoods and districts to conserve open space resources, minimize infrastructure costs, and reduce reliance on the automobile.

Land Use Goal LU-6: Economically Viable and Productive Land Uses that Increase the City's Tax Base.

- **Policy LU-6.1**. Encourage a mix of land uses that maintain and improve the City's long-term fiscal health.
- **Policy LU-6.2**. Continue to promote and support the vitality of commercial uses to meet the needs of local residents and that support regional-serving commercial centers.
- **Policy LU-6.7**. Encourage new and retain existing businesses that provide local shopping and services.
- **Policy LU-6.13.** Encourage new development along major corridors that are pedestrian oriented and includes a mixture of retail/service, residential, and office uses.

Land Use Goal LU-8: Promote a range of multiple uses at the Fairview Developmental Center site.

- **Policy LU-8.1**: In anticipation of the potential closure or repurposing of the Fairview Development Center site, the City will work with appropriate State agencies or private entity (if the property is sold) to plan for a complementary mix of residential, institutional, public facilities, open spaces, and recreational uses within a campus setting.

Growth Management Element

Goal GM-2: Integration of Land Use and Transportation Planning

- **Policy GM-2.1.** Ensure that land use designations are reflected in the sub-regional county model and SCAG's model through consistent assumptions and methodologies.

Housing Element

Housing Goal HOU-3: Identify adequate, suitable sites for residential use and development to meet the City's Regional Housing Needs Assessment (RHNA) at all income levels and promote a range of housing types to meet the needs of all segments of the Costa Mesa community.

- **Policy HOU-3.1.** Encourage the conversion of existing marginal, underutilized, or vacant motels, commercial, and/or industrial land to residential, where feasible and consistent with environmental conditions that are suitable for new residential development.
- **Policy HOU-3.2**:.Encourage the development of well-planned and designed residential or mixed-use projects which, through vertical or horizontal integration, provide for the development of compatible residential, commercial, industrial, institutional, or public uses within a single project, neighborhood, or geographic area within the City.

Noise Element

Goal N-1: Noise Hazards and Conditions

- **Policy N-1.6**. Discourage sensitive land uses from locating within the 65 CNEL noise contour of John Wayne Airport. Should it be deemed by the City as appropriate and/or necessary for a sensitive land use to locate in the 65 CNEL noise contour, ensure that appropriate interior noise levels are met and that minimal outdoor activities are allowed.

Goal N-2. Noise and Land Use Compatibility

- **Policy N-2.7**. Encourage effective site planning in mixed-use areas that provides the optimal distance between source of excessive sound and residents.

- **Policy N-2.8**. Require new mixed-use developments to site loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noise sources away from the residential portion of the development and adjacent established residential development.

Community Design Element

- **Policy CD-9.1**. Require that mixed-use development projects be designed to mitigate potential conflicts between uses. Consider noise, lighting, and security.
- **Policy CD-9.2**. Provide adequate parking, open space and recreational facilities to serve residents in mixed-use development projects. Design parking and other areas to acknowledge different users (residents versus shoppers) and to be compatible with the architectural character of the building(s).

Open Space and Recreation Element

- **Policy OSR-1.5.** Maximize public space by requiring plazas and public gathering spaces in private developments that can serve multiple uses, including recreation and social needs
- **Policy OSR-1.18.** Provide a minimum of 4.26 acres of parkland per 1,000 residents.

City of Costa Mesa Municipal Code

The City of Costa Mesa's Title 13, Planning, Zoning, and Development (the Zoning Code), of the Costa Mesa Municipal Code provides the legal framework for land-use planning and zoning regulations. Chapter IV, Citywide Land Use Matrix, provides a comprehensive list of uses which are permitted, conditionally permitted, or prohibited in the various zoning districts. The project site is currently zoned Institutional & Recreational–Multi-Use (I&R-MLT), and Planned Development Residential–High Density (PDR-HD),see Section 2.4.3, *Existing General Plan Designation and Zoning,* of this DEIR.

Costa Mesa Municipal Code, Chapter V, Article 7, Section 13-64 et seq., Institutional and Recreational, Institutional and Recreational School Districts, and Institutional and Recreational Multi-Use, indicates that the purpose of the I&R-MLT is to provide development standards for both publicly and privately owned land which provide recreation, open space, health, public service, educational, and housing opportunities.

3.10.2 Existing Conditions

The FDCSP covers approximately 93 acres at the 109-acre FDC facility at 2501 Harbor Boulevard and 2 acres of primarily right-of-way on Fair Drive. The project site is surrounded by residential uses jointly owned and operated by California Department of Developmental Services (DDS) to the north, the developing Southern Regional Emergency Operations Center (SREOC) to the southwest, and the Costa Mesa Country Club the east, west, and south.

The project site is disturbed with the former Fairview Developmental Center (FDC), a portion of the County Club' golf course operations, and the right-of-way on Fair Drive. As shown in Figure 2-3, *Aerial View*, in Chapter 2, *Project Description*, the site is interspersed with open space areas among the low-rise FDC buildings. The former FDC buildings were used for residence and included amenities for residents. The state closed the facility in December 2025, and all buildings on-site are vacant.

Existing General Plan and Zoning Designations

The 93-acre FDC-portion of the project site has a General Plan land use designation of Multi-Use Center (MUC) under the Costa Mesa General Plan. The Multi-Use Center (MUC) allows low- to moderate-intensity urban uses with residential densities ranging from 6 to 40 units per acre and a maximum 0.25 floor-area ratio (FAR) for nonresidential uses. The 2-acre Fair Drive portion of the project site is designated Medium Density Residential, allowing up to 12 units per acre.

The zoning of the FDC-portion of the project site is Institutional & Recreational–Multi-Use (I&R-MLT), which permits institutional and recreational uses with a 0.25 FAR, requires a minimum of 25 percent open space, and allows up to 582 dwelling units. The Fair Drive portion of the project site is zoned Planned Development Residential–High Density (PDR-HD), which allows residential development at 20 or more units per acre.

3.10.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to land use if it would:

a) Physically divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

METHODOLOGY

The evaluation of impacts related to land use and planning is based on a review of existing policies, plans, and regulations that guide development and growth in the City of Costa Mesa. Information obtained from these sources was reviewed and summarized to describe existing conditions and identify environmental effects based on the proposed project's consistency with the regulatory background presented in this section. The level of significance was based on the consistency analysis of the regulatory land use document, and the analysis assumes that the

proposed project would comply with relevant federal, state, and local laws, ordinances, and regulations.

3.10.4 Project Impact Analysis

a) Would the project physically divide an established community?

The project site encompasses the vacant FDC, a portion of the County Club, and the right-of-way on Fair Drive. There is no established community within the project site, the FDC residential uses are vacant. The proposed project would occur within the project site boundaries. The proposed project would construct a new roadway, bike paths, and trails to enhance pedestrian and vehicle connectivity within the project site and with the surrounding area. Implementation of the proposed project would not obstruct access to any existing areas or buildings surrounding the project site.

The proposed project would not physically divide an established community, and **no impact** would occur.

Significance without Mitigation: No Impact.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

This section discusses the proposed project's consistency with applicable regional and local plans that are adopted for the purpose of avoiding or mitigating a physical impact on the environment.

General Plan and Zoning

The General Plan land use designation for the site is MUC, which allows low- to moderate-intensity urban uses. In 2022, the site was identified as a housing opportunity site under the 2021-2029 Housing Element, which allows up to 2,300 residential units. As a part of the Project, the existing zoning of the site will be amended to reflect the FDCSP. The City's Zoning Code and Zoning map will designate the project site as the "Fairview Developmental Center Specific Plan" and the General Plan land use designation will be updated to refer to the Specific Plan as well.

Development under the proposed project would be subject to the development standards, permitted uses, and administrative processes designated in the FDCSP. The proposed specific plan identifies a conceptual site plan with three major categories of land uses distributed throughout the project site: residential, commercial, and open space. Buildout of the project site pursuant to the FDCSP would result in an estimated maximum of 9,926 residents and 74

employees based on a maximum of 4,000 housing units and 35,000 square feet allowed in the FDCSP, see Table 2-3, *FDCSP Buildout*, in Chapter 2, *Project Description*. The proposed project would include 14 acres of public open space, new pedestrian trails on-site, private open space within housing spaces (balconies, and enclosed patios), private open space amenities including plazas, and other indoor gathering areas. The on-site publicly accessible and privately owned open spaces would contribute to the open space on-site.

General Plan Consistency

Table 3.10-1, *Consistency with General Plan Goals and Policies*, evaluates the proposed project's consistency with the City's existing General Plan. The analysis in this table substantiates that the proposed project would be consistent with the applicable goals and policies of the Costa Mesa General Plan.

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
Land Use Goal LU-1: A Balanced Community with a Mix of Land Uses to Meet Resident and Business Needs	
Policy LU-1.1: Provide for the development of a mix and balance of housing opportunities, commercial goods and services, and employment opportunities in consideration of the needs of the business and residential segments of the community.	**Consistent**: The proposed project would provide a balance of housing opportunities and economic development with up to 4,000 residential units, and 35,000 square feet of commercial space. The commercial uses would be supported by the proposed residential development and the existing surrounding development. As discussed in Section 3.12, *Population and Housing*, the housing opportunities provided by the proposed project have a beneficial impact with the declared housing crisis in California following the passage of the Housing Crisis Act of 2019 (SB 330). In addition, the 35,000 square feet of commercial space would allow for new businesses to develop and employment opportunities within the City.
Policy LU-1.3: Strongly encourage the development of residential uses and owner-occupied housing (single-family detached residences, condominiums, townhouses) where feasible to improve the balance between rental and ownership housing opportunities.	**Consistent**. The proposed project would allow for the development of up to 4,000 residential units. As outlined in Appendix C of the FDCSP, *FDCSP Market Study (2024)*, redevelopment of the FDC is expected to create new market demand above and beyond that expected based on current trends for rental housing and ownership housing. In addition, the FDCSP emphasizes the importance of incorporating smaller homes, while still accommodating larger households, for both ownership and rental housing opportunities. Although the exact ratio of owner-occupied housing and rental housing is unknown at this time, the project is intended to provide a diverse housing mix of household ownerships and sizing.

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
Policy LU-1.4: Promote housing and employment opportunities within planned development areas to the extent feasible.	**Consistent**. The proposed project would develop an underutilized project site for the development of up to 4,000 residential units, 35,000 square feet of commercial space, and a minimum of14-acres of public open space areas.
Policy LU-1.5: Maintain a land use structure that strives to balance jobs and housing with available infrastructure and public and human services.	**Consistent**. The proposed project would allow for the development of up to 4,000 residential units, 35,000 square feet of commercial space, and a minimum of 14-acres of public open space areas. As discussed in Section 3.17, *Utilities and Service Systems*, although the site is serviced by existing utilities, new infrastructure would be needed to accommodate the proposed project. The Specific Plan includes phasing for the new access road, water, sewer, drainage, natural gas, and electrical service within the plan area.
Land Use Goal LU-2: Preserve and Protect Residential Neighborhoods	
Policy LU-2.7: Permit the construction of buildings over two stories or 30 feet only when it can be shown that the construction of such structures will not adversely impact surrounding developments and deprive existing land uses of adequate light, air, privacy, and solar access.	**Consistent**. Section 4.6, *Development and Design Standards*, of the FDCSP establishes site specific standards including maximum building heights ranging from 35 to 135 feet. Residential and mixed-use land uses would have the highest maximum allowable height of 100 feet and 135 feet, respectively. The FDCSP also includes standards for building scale, massing, orientation, and setbacks, including a standard of 10-foot separation between all primary buildings. These standards would ensure that the existing residential development north of the FDCSP would continue to receive light access, air flow, and privacy in accordance with the City's standards. Additionally, the DDS housing would serve as a transitional buffer between the higher-intensity uses and the existing residential uses. The DDS housing would have a maximum height of 50 feet, a comparable height to the high-density residential uses (Harbor Village Apartments) and the medium-density residential uses to the north. As discussed in Section 3.1, *Aesthetics*, the proposed project would not obstruct scenic vistas or conflict with City regulations regarding scenic quality. The SREOC Tower and antenna clearance requirements also place restrictions for allowable heights of buildings within the antenna clearance zones. As shown in Figure 4-4 of the FDCSP, the communication tower requires a width of approximately 30 to 50 feet of clearance at certain height levels to maintain direct line-of-sight radio communications with La Habra Peak and Santiago Peak regional communication towers.

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
	In addition, existing building setbacks and project development standards would ensure adequate separation between land uses. As a result, impacts related to light, air, privacy, and solar access would not be significant.
Policy LU-2.8: Limit building height to four stories above grade south of the I-405 Freeway, except for special purpose housing such as elderly, affordable, or student housing, unless otherwise approved by a General Plan amendment. (A four-story/five-level parking structure with roof deck parking on the fifth level is considered a four-story structure.) The height limitation may be increased further to realize the residential site capacity, or density, of housing opportunity sites identified within the sites inventory of the Housing Element.	**Consistent**. The FDCSP would allow residential uses at a height of up to 100 feet, (may be exceeded by 35 feet for two buildings) and mixed-use up to 135 feet [refer to table 3.1-2]. However, the site is identified within the sites inventory of the Housing Element, and the proposed project includes the adoption of a General Plan Amendment and Zoning Code Amendment. The proposed building heights shall comply with the height limitations associated with the SREOC communications tower. Under the Fairview Developmental Center Specific Plan land use and zoning designation the project would be allowed to exceed four stories above grade south of the I-405 freeway.
Policy LU-2.9: Require appropriate building setbacks, structure orientation, and placement windows to consider the privacy of adjacent residential structures within the same project and on adjacent properties.	**Consistent**. The proposed project would adhere to Section 4.6, Development and Design Standards, of the specific plan, which provides standards for development and design standards for building setbacks, and structure orientation for privacy of adjacent residential structures.
Land Use Goal LU-3: Development that Maintains Neighborhood Integrity and Character	
Policy LU-3.5: Provide opportunities for the development of well-planned and designed projects which, through vertical or horizontal integration, provide for the development of compatible residential, commercial, industrial, institutional, or	**Consistent**. The FDCSP would allow for the development of residential, commercial, and open space land uses. The proposed project would provide a balance of housing opportunities and economic development with up to 4,000 residential units, and 35,000 square feet of commercial space. Section 4.6, Development and Design Standards, of the specific plan includes standards for a seamless integration of vertical or horizontal development. For example, as described in Section 4.6.2, Building Orientation, of the FDCSP, the main building entries in the FDCSP area shall be oriented

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
public uses/ within a single project or neighborhood.	toward the Promenade, a street, plaza, paseo, or park. The proposed project emphasizes transitions between uses with the DDS housing and parks providing buffers and visual relief from existing and proposed uses. In addition, the mixed-use development would be limited, strategically located at key intersections, and designed with increased building height at the corner by up to 10 feet, if applicable.
Policy LU-3.8: Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development and surrounding residential neighborhoods. **Policy LU-3.12**: Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development.	**Consistent**. The proposed project would adhere to Section 4.6, Development and Design Standards, of the specific plan, which provides standards for development and design standards; these standards supersede Title 13, Chapter V, Development Standards, of the Costa Mesa Municipal Code, or any future citywide design standards, unless specified otherwise. If the FDCSP is silent on a topic, the City's zoning standards in the Municipal Code shall apply, or any future citywide design standards. All buildings shall comply with California Building Energy Efficiency Standards (or future equivalent building code). In addition, the proposed building heights shall comply with the height limitations associated with the SREOC communications tower.
Policy LU-3.9: Locate high-intensity developments or high-traffic-generating uses away from low-density residential in order to buffer the more sensitive land uses from the potentially adverse impacts of the more intense development or uses.	**Consistent**: The proposed project is surrounded by high density residential uses (Harbor Village Apartments) and the medium density residential uses to the north, and the municipal golf course to the west, east, and south. There are no low-density uses at or surrounding the project site. However, the project located the lower intensity DDS housing along North Shelly Circle to provide a transitional buffer between the higher-intensity uses and the existing residential uses.
Land Use Goal LU-5: Adequate Community Services, Transportation System, and Infrastructure to Meet Growth	
Policy LU-5.6: Promote development of revenue-generating land uses to help defray the costs of high quality public services.	**Consistent**. The proposed project would develop an underutilized site to develop up to 4,000 residential units and 35,000 square feet of commercial space. The 35,000 square feet of commercial space would allow for new revenue generating businesses.
Policy LU-5.7: Encourage new development that is organized around compact, walkable, mixed-use neighborhoods and districts to conserve open	**Consistent**: The FDCSP promotes development organized around compact, walkable, mixed-use neighborhoods and districts. The plan allows for an integrated mix of residential, commercial, and open space land uses. Due to the high-density development, the project incorporates a minimum of 14 acres of public open space

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
space resources, minimize infrastructure costs, and reduce reliance on the automobile.	and new pedestrian trails on-site. The new trails connect to surrounding development and would allow future residents to safely traverse throughout the project site, not including on-site sidewalks.
Land Use Goal LU-6: Economically Viable and Productive Land Uses that Increase the City's Tax Base	
Policy LU-6.1: Encourage a mix of land uses that maintain and improve the City's long-term fiscal health.	**Consistent**. The proposed project would develop up to 4,000 residential units and 35,000 square feet of commercial space. The 35,000 square feet of commercial space would allow for new revenue-generating businesses to maintain and improve the City's long-term fiscal health.
Policy LU-6.2: Continue to promote and support the vitality of commercial uses to meet the needs of local residents and that support regional-serving commercial centers.	**Consistent**. The proposed project would provide a balance of housing opportunities and economic development with up to 4,000 residential units and 35,000 square feet of commercial space. The commercial uses would be supported by the proposed residential development and the existing surrounding development. The commercial uses within the mixed-use land use would be at key intersections and provide accessible areas for local shopping and services.
Policy LU-6.7: Encourage new and retain existing businesses that provide local shopping and services.	**Consistent**. See response to Policy-LU 6.2.
Policy LU-6.11: Provide opportunities for mixed-use office, manufacturing, and retail development that responds to market and community needs in terms of size, location, and cost.	**Consistent**. See response to Policy-LU 6.2.
Policy LU-6.13: Encourage new development along major corridors that are pedestrian oriented and includes a mixture of retail/service, residential, and office uses	**Consistent**. See response to Policy-LU 6.2.
Land Use Goal LU-8: Promote a range of multiple uses at the Fairview Developmental Center site	
Policy LU-8.1: In anticipation of the potential closure or repurposing of the Fairview Development Center site, the	**Consistent**. The proposed project would repurpose the FDC to develop up to 4,000 residential units, 35,000 square feet of commercial space, and a minimum of 14 acres of public open space. The project is being developed in coordination with the City of

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
City will work with appropriate State agencies or private entity (if the property is sold) to plan for a complementary mix of residential, institutional, public facilities, open spaces, and recreational uses within a campus setting.	Costa Mesa, California Department of General Services, and the California Department of Developmental Services. Please refer to Chapter 2, *Project Description*, for an in-depth discussion of the proposed project and state agency involvement in the project.
Growth Management Goal GM-2: Integration of Land Use and Transportation Planning	
Policy GM-2.1: Ensure that land use designations are reflected in the sub-regional county model and SCAG's model through consistent assumptions and methodologies.	**Consistent**. SCAG had been previously notified of the project site and potential development, since the Costa Mesa's 6th Cycle Housing Element identified the FDC site as a candidate site. The modified project's land use framework and associated development standards are consistent with regional forecasting methodologies, including population, housing, and employment projections. Coordination with Orange County Council of Governments (OCCOG) and SCAG would ensure that the proposed land use designations and development intensities are accurately reflected in regional growth forecasts and travel demand models. See Table 3.10.2, *Proposed Project Consistency Analysis with Connect SoCal 2024 Goals*, for additional consistency analysis with SCAG.
Housing Goal HOU-2: Facilitate the creation and availability of housing for residents at all income levels and for those with special housing needs.	
Policy HOU-2.1: Facilitate the development of housing that meets the needs of all segments of the population including affordable housing and households with specialized needs.	**Consistent.** The proposed project would meet the Housing Element's RHNA requirements for the project site which include the provision of affordable housing. In addition, at least 200 of the housing units in the very low-income category shall be reserved as permanent supportive housing consistent with SB 188. Additionally, 15 acres of the project site would be reserved for development of affordable housing by DDS and a minimum of 20 percent of these housing units are required to be available and affordable to individuals with developmental disabilities served by a regional center pursuant to the Lanterman Developmental Disabilities Services Act consistent with SB 82. The 15-acre DDS site can include some if not all of the 200 permanent supportive housing. As outlined in Table 2-6, *Maximum FDCSP Housing Units by RHNA Category*, the proposed project can result in the maximum buildout of 575 very low income units and 345 low income units. While the development pursuant to the FDCSP would be required to provide the number of affordable housing units consistent with the FDC Housing Element Site's RHNA obligation the distribution of

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
	affordable units beyond those required by the adopted Housing Element is subject to change based on the Affordable Housing Implementation Plan submitted by the Master Developer.
Policy HOU-2.2: Promote the use of State density bonus provisions to encourage the development of affordable housing for lower and moderate-income households, as well as senior housing through the dissemination of informational materials and discussions with project applicants.	**Consistent.** The proposed project would require and facilitate the development of affordable housing at the project site. Development under the proposed project would also be eligible for density bonus increases under Title 13, Chapter IX, Article 4, Density Bonus and other incentives, of the City's Municipal Code. The proposed project would therefore support the City's efforts to promote density bonus provisions.
Housing Goal HOU-3: Provision of Adequate Sites	
Policy HOU-3.1: Encourage the conversion of existing marginal, underutilized, or vacant motels, commercial, and/or industrial land to residential, where feasible and consistent with environmental conditions that are suitable for new residential development.	**Consistent**. The project would redevelop the underutilized FDC site for the development of the FDCSP, which includes development of up to 4,000 residential units, 35,000 square feet of commercial space, and a minimum of 14 acres of public open space. As substantiated in Ch.3 of this DEIR, the environmental conditions of the project site are suitable for development of the proposed project.
Policy HOU-3.2: Encourage the development of well-planned and designed residential or mixed-use projects which, through vertical or horizontal integration, provide for the development of compatible residential, commercial, industrial, institutional, or public uses within a single project, neighborhood, or geographic area within the City.	**Consistent**. See response to Policy LU-3.5.
Housing Goal HOU-3: Provide housing opportunities to residents of all social and economic segments of the community without discrimination on the basis of race, color, religion, sex, sexual orientation, disability/medical conditions, national origin or ancestry, marital status, age, household composition or size, source of income, or any other arbitrary factors.	

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
Policy HOU-4.3: Encourage and support the construction, maintenance and preservation of residential developments which will meet the needs of families and individuals with specialized housing requirements, including those with developmental disabilities.	**Consistent.** Pursuant to SB 82 and SB 188, the proposed project is required to develop new housing for the developmentally disabled in addition to permanent supportive housing. The FDCSP facilitates this development through its goals, development standards, and land use plan. Under implementation of the proposed project, new residential units would be specifically restricted to families and individuals with specialized housing requirements.
Noise Goal N-1: Noise Hazards and Conditions	
Policy N-1.6: Discourage sensitive land uses from locating within the 65 CNEL noise contour of John Wayne Airport. Should it be deemed by the City as appropriate and/or necessary for a sensitive land use to locate in the 65 CNEL noise contour, ensure that appropriate interior noise levels are met and that minimal outdoor activities are allowed.	**Consistent**. As discussed in Section 3.11, *Noise*, the project site is outside of all airport noise contours for John Wayne Airport. Therefore, the project would not introduce any sensitive land uses within the 65 CNEL noise contour of John Wayne Airport. Consistent with General Plan Goals N-1 and N-2, the FDCSP incorporates site planning and development standards intended to minimize noise exposure to sensitive receptors.
Noise Goal N-2: Noise and Land Use Compatibility	
Policy N-2.7: Encourage effective site planning in mixed-use areas that provides the optimal distance between source of excessive sound and residents.	**Consistent**. Consistent with General Plan Goals N-1 and N-2, the FDCSP incorporates site planning and development standards intended to minimize noise exposure to sensitive receptors.
Policy N-2.8: Require new mixed-use developments to site loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noise sources away from the residential portion of the development and adjacent	**Consistent**. See response to Policy N-2.8.

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
established residential development.	
Community Design Goal CD-9: Mixed Use	
Policy CD-9.1: Require that mixed-use development projects be designed to mitigate potential conflicts between uses. Consider noise, lighting, and security.	**Consistent**. See response to Policy LU-2.7**.**
Policy CD-9.2: Provide adequate parking, open space and recreational facilities to serve residents in mixed-use development projects. Design parking and other areas to acknowledge different users (residents versus shoppers) and to be compatible with the architectural character of the building(s).	**Consistent**. Parking in the FDCSP area shall be designed to support development needs while minimizing visual impacts and reinforcing a pedestrian-oriented environment and shall be provided in accordance with Table 5-2 of the FDCSP. The proposed project would provide on-site public open space and private and common open space (amenities) for residents and the public. As discussed in Section 3.14, *Recreation*, the proposed project includes a minimum of 14 acres of public open space—a combination of on-site public open space, private and common open space (amenities); the payment of the Park and Recreation Impact Fees as well as property and sales tax revenue would contribute to improvements and maintenance of existing recreation facilities. Impacts were determined to be less than significant.
Open Space and Recreation Goal OSR-1: Balanced and Accessible System of Parks and Open Spaces	
Policy OSR-1.1: Maintain a system of Neighborhood and Community Parks that provide a variety of active and passive recreational opportunities throughout the City.	**Consistent.** The proposed project would contribute to the City's efforts to provide a system of parks and recreational opportunities by requiring the provision of a minimum of 14 acres of public open space onsite and requiring development to meet the City's 4.26 acres of parkland per 1,000 resident standard through land dedication, park improvements, and payment of impact or in-lieu fees. This space would complement the existing recreational space in the project vicinity including Fairview Park to the west.
Policy OSR-1.2: Provide parks and recreation facilities appropriate for the individual neighborhoods in which they are located and reflective of the needs and interests of the population they serve.	**Consistent.** The proposed project creates recreational opportunities local to the project site and surrounding community by providing a minimum of 14 acres of public open space onsite. The FDCSP also facilitates the development of private open space amenities including plazas, and other indoor gathering areas, which would be designed to suit the needs of residents of the FDCSP.
Policy OSR-1.5: Maximize public space by requiring plazas	**Consistent**. The FDCSP incorporates site planning and development standards which include urban design objectives for public space,

Table 3.10-1 Consistency with General Plan Goals and Policies

Goals	Consistency Analysis
and public gathering spaces in private developments that can serve multiple uses, including recreation and social needs	and private open space. The proposed project includes private open space within housing spaces (balconies, and enclosed patios), common open space amenities including plazas, and other indoor gathering areas.
Policy OSR-1.18: Provide a minimum of 4.26 acres of parkland per 1,000 residents.	**Consistent**. As discussed in Section 3.14, *Recreation*, in accordance with the City parkland standard, the project would require 42.28 acres of parkland, and the proposed project includes a minimum of 14 acres of public open space. Although the project would not provide a minimum of 4.26 acres of parkland per 1,000 residents, FDCSP Section 6.2.1, Open Space Standards, requires that new development achieve this standard through land dedication, park improvements, and payment of in-lieu fees. Ultimately, no less than 14 acres of publicly accessible open space shall be provided for the FDC site. The combination of on-site open space, and the payment of the Park and Recreation Impact Fees —as well as property and sales tax revenue— would ensure impacts to recreational facilities and parkland under the proposed project are less than significant.
Policy OSR-1.20: Enhance pedestrian, bicycle, and transit linkages to meet the needs of residents and to provide better access to parks, recreation, and public spaces.	**Consistent.** The proposed project would implement a network of pedestrian and bicycle facilities through the project site along a variety of roadway types including promenades, internal roads, paseos, and multi-use trails. This would provide both accessibility to recreational spaces internal to the site and to surrounding community. Additionally, Orange County Transportation Authority bus Route 43 runs in a north to south direction between Fullerton and Costa Mesa along Harbor Boulevard which is a major road adjacent to the project site and would provide pedestrians access to this nearby service.

Source: Costa Mesa 2015.

Connect SoCal 2024

Connect SoCal 2024 is the primary plan that guides transportation and land use decisions on a regional level. While the Connect SoCal 2024 goals are intended to direct decisions made by SCAG, local land use plans and projects are encouraged to analyze consistency with Connect SoCal 2024 to ensure that local and regional land use decisions are aligned. An analysis of the proposed project's consistency to the goals of the Connect SoCal 2024 is provided in Table 3.10-2, *Proposed Project Consistency Analysis with Connect SoCal 2024 Goals*.

Table 3.10-2 Proposed Project Consistency Analysis with Connect SoCal 2024 Goals

Goals	Consistency Analysis
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**Consistent**. The proposed project is a mixed-use project on an underutilized site that would introduce residential, commercial, and open space uses. Mixed-use projects are often characterized as having lower VMT, which could improve air quality and minimize greenhouse gas emissions. As noted under Threshold b), of Section 3.15, *Transportation*, the boundary method VMT analysis identified that the proposed project would have a beneficial impact on VMT/SP in the City.
Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**Consistent**. The Specific Plan accommodates multiple modes of travel within the project site, such as driving, biking, walking, and pedestrian access to existing bus stops in the surrounding area.
Support planning for people of all ages, abilities and backgrounds.	**Consistent**. The proposed project includes an affordable housing component. See Section 2.6.2, *Affordable Housing*, in Chapter 2, *Project Description*, for more details. The proposed project would comply with ADA requirements.
Communities: Develop, connect and sustain livable and thriving communities.	
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.	**Consistent.** The proposed project is a mixed-use project in an underutilized site that would introduce residential, commercial, and open space. As mentioned in Threshold b) of Section 3.15, *Transportation,* the proposed project would not exceed VMT thresholds.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households**.**	**Consistent**. The proposed project includes an affordable housing component. See Section 2.6.2, *Affordable Housing*, in Chapter 2, *Project Description*, for more details.
Environment: Create a healthy region for the people of today and tomorrow.	
Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change**.**	**Consistent**. See Threshold d) of Section 3.15, *Transportation*. The proposed project would not result in safety hazards. The project site is not subject to sea level rise. The project site is in an area that has a high heat index. New buildings would include energy systems capable of cooling the buildings during heat alerts.
Integrate the region's development pattern and transportation network to improve air quality, reduce	**Consistent**. The proposed project is a mixed-use project on an underutilized site that would introduce residential, commercial, and open space uses. Mixed-use projects are

Table 3.10-2 Proposed Project Consistency Analysis with Connect SoCal 2024 Goals

Goals	Consistency Analysis
greenhouse gas emission and enable more sustainable use of energy and water.	often characterized as having lower VMT, which could improve air quality and minimize greenhouse gas emissions. As noted under Threshold b) of Section 3.15, *Transportation*, the boundary method VMT analysis identified that the proposed project would have a beneficial impact on VMT/SP in the City.
Conserve the region's resources.	**Consistent**. The proposed project incorporates mitigation measures to protect biological resources. See Section 3.3, *Biological Resources*, for mitigation measures that would avoid impacting biological resources.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.	
Improve access to jobs and educational resources.	**Consistent.** The proposed project would result in 74 jobs. The Estancia High School is 0.4 mile southwest of the project site and is the high school for the Estancia Zone of the Newport-Mesa Unified School District. The proposed project includes a residential component that would introduce new students into the District boundaries.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Consistent**. The proposed project would encourage compatibility between land uses to promote healthy lifestyles, active transportation, access to transit, new open space and parkland opportunities, and bicycle and pedestrian connectivity to recreational amenities.

Source: SCAG 2024.

Conclusion

As discussed above, the proposed project would be consistent with goals and policies of the City's General Plan and SCAG's RTP/SCS. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.10.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to land use?

The area is considered for cumulative impacts in the City of Costa Mesa. The projects listed in the introduction to Chapter 3, *Environmental Analysis*, Table 3-1, *Cumulative Projects*, which includes the City Housing Element Rezone Project, the SREOC project, and the DDS site. Land

use and zoning regulations are derivatives of a City's general police power. As shown in *Sierra Club v. County of Napa*, 121 Cal. App.4th 1490 (2004), a given project need not be in perfect conformity with each and every general plan policy. To be consistent, a project must be "compatible with" the objectives, policies, general land uses, and programs specified in the general plan. The proposed project would require a General Plan Amendment and Zoning Code Amendment. Impacts to land uses were analyzed utilizing a consistency analysis with the City of Costa Mesa's General Plan and SCAG's 2040-2050 RTP/SCS. Table 3.10-1 provides an analysis as to why the proposed project is consistent with SCAG's adopted RTP/SCS, and Table 3.10-2 provides an analysis of why the proposed project is compatible with the City of Costa Mesa's General Plan. Other development projects in the City are also required to demonstrate consistency with the City's General Plan and other applicable policies and regulations governing land use prior to approval.

Implementation of the FDCSP would allow for residential, commercial, and open space land uses that would mesh and create a unique community within the City of Costa Mesa. The proposed project would allow for additional residential and employment opportunities and provide necessary housing units to meet the City's RHNA allocation, provide supportive housing, and infrastructure.

In addition, the proposed project would not physically divide an existing community. As with the proposed project, other projects would also be required to discuss if the project would physically divide an established community during the CEQA process. Implementation of cumulative development, when combined with the proposed project, would not result in cumulatively considerable land use impacts.

Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.10.6 References

Costa Mesa, City of. 2016. 2015-2035 General Plan. https://www.costamesaca.gov/government/departments-and-divisions/economic-and-development-services/planning/general-plan/2015-2035-general-plan.

SCAG (Southern California Association of Governments). 2024. Connect SoCal. https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf.

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3.11 NOISE

This section of the DEIR evaluates the potential of the proposed project to result in impacts on the noise environment in the local vicinity. Specifically, this section summarizes relevant State and local noise policies and standards; describes existing ambient noise conditions; and evaluates potential construction and operational noise impacts. The analysis in this section is based, in part, on the following report, which is incorporated as an appendix to this DEIR:

- *Noise and Vibration Assessment for the Fairview Developmental Center Specific Plan Project*, ECORP Consulting Inc., February 2026 (Appendix H.1)

Additional information, sources, and modeling can be found in Appendix H.1. All information in this section is from Appendix H.1 unless otherwise noted.

Notice of Preparation Comments

The City received one comment letter related to noise impacts from the organization Costa Mesa First on December 5, 2025, for the Notice of Preparation (NOP). The comment letter requests that the proposed project include “quiet asphalt” to reduce noise associated with project traffic. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the comment letters.

Noise and Vibration Fundamentals

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear.

Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be three dB higher than one source under the same conditions. For example, a 65-dB source of sound, such as a truck, when joined by another 65 dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by three dB). Under the decibel scale, three sources of equal loudness together would produce an increase of five dB.

NOISE DESCRIPTORS

The decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. The noise descriptors are most often encountered when dealing with traffic, community, and environmental noise include the Equivalent Noise Level (Leq) as well as the Day-Night Average Noise Level (Ldn) and Community Noise Equivalent Level (CNEL). The Leq is a measure of ambient noise, while the Ldn and CNEL are measures of community noise. Each is applicable to this analysis and defined as follows:

- **Leq** is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- **Ldn** is a 24-hour average Leq with a 10-dBA "weighting" added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour Leq would result in a measurement of 66.4 dBA Ldn.
- **CNEL** is a 24-hour average Leq with a 5-dBA weighting during the hours of 7:00 pm to 10:00 pm and a 10-dBA weighting added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

SOUND PROPAGATION AND ATTENUATION

Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dB (dBA) for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately 3 dBA for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dBA per doubling of distance is normally assumed. For line sources, an overall attenuation rate of three dB per doubling of distance is assumed.

Noise levels may also be reduced by intervening structures; generally, a single row of detached buildings between the receptor and the noise source reduces the noise level by about five dBA, while a solid wall or berm generally reduces noise levels by 5 to 10 dBA. According to the Federal Highway Administration (FHWA), noise barriers can reduce noise levels by 15 dBA in certain instances, yet this level of noise reduction is very difficult to achieve. To achieve the most potent noise-reducing effect, a noise enclosure/barrier must physically fit in the available space, must completely break the “line of sight” between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend lengthwise and vertically as far as feasibly possible to be most effective. The limiting factor for a noise barrier is not the component of noise transmitted through the material, but rather the amount of noise flanking around and over the barrier. In general, barriers contribute to decreasing noise levels only when the structure breaks the "line of sight" between the source and the receiver.

The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more. Generally, in exterior noise environments ranging from 60 dBA CNEL to 65 dBA CNEL, interior noise levels can typically be maintained below 45 dBA, a typical residential interior noise standard, with the incorporation of an adequate forced air mechanical ventilation system in each residential building, and standard thermal-pane residential windows/doors with a minimum rating of Sound Transmission Class (STC) 28.[1] In exterior noise environments of 65 dBA CNEL or greater, a combination of forced-air mechanical ventilation and sound-rated construction methods is often required to meet the interior noise level limit. Attaining the necessary noise reduction from exterior to interior spaces is readily achievable in noise environments experiencing less than 75 dBA CNEL with proper wall construction techniques following California Building Code (CBC) methods, the selections of proper windows and doors, and the incorporation of forced-air mechanical ventilation systems.

HUMAN RESPONSE TO NOISE

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

[1] STC is an integer rating of how well a building partition attenuates airborne sound. In the U.S., it is widely used to rate interior partitions, ceilings, floors, doors, windows, and exterior wall configurations.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL or Ldn is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in A-weighted noise levels (dBA), the following relationships should be noted in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A change in level of at least 5 dBA is required before any noticeable change in community response would be expected. An increase of 5 dBA is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

VIBRATION SOURCES AND CHARACTERISTICS

Sources of earth-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or manmade causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions).

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the Peak Particle Velocity (PPV); another is the Root Mean Square (RMS) velocity. The Peak Particle Velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage. For human response, however, an average vibration amplitude is more appropriate because it takes time for the human body to respond to the excitation (the human body responds to an average vibration amplitude, not a peak amplitude). Because the average particle velocity over time is zero, the RMS amplitude is typically used to assess human

response. The RMS value is the average of the amplitude squared over time, typically a 1-second period.

To sensitive individuals, vibrations approaching the threshold of perception (0.08 PPV) can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high-noise environments, which are more prevalent where groundborne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. For instance, heavy-duty trucks generally generate groundborne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances, which is considered very unlikely to cause damage to buildings of any type. Common sources for groundborne vibration are planes, trains, and construction activities such as earthmoving which requires the use of heavy-duty earth moving equipment.

3.11.1 Regulatory Framework

FEDERAL

Federal Transit Administration

The Federal Transit Administration (FTA) provides a guidance manual that contains procedures for predicting and assessing noise and vibration impacts of proposed transit projects. This manual acknowledges that noise and vibration are among the primary concerns of the surrounding communities. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the surrounding land use. The FTA provides guidelines that are typically considered applicable criteria for construction noise assessments in a CEQA analysis.

Federal Interagency Committee on Noise

The Federal Interagency Committee on Noise (FICON) thresholds of significance assist in the evaluation of increased traffic noise. The 2000 FICON findings provide guidance as to the significance of changes in ambient noise levels due to transportation noise sources. FICON recommendations are based on studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. FICON's measure of substantial increase for transportation noise exposure is as follows:

- If the existing ambient noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.) are less than 60 dBA CNEL and the project creates a readily perceptible 5 dBA CNEL or greater noise level increase, or
- If the existing noise levels range from 60 to 65 dBA CNEL and the project creates a barely perceptible 3 dBA CNEL or greater noise level increase, or
- If the existing noise levels already exceed 65 dBA CNEL and the project creates a community noise level increase of greater than 1.5 dBA CNEL.

STATE

California Building Code

The State of California provides a minimum standard for building design through Title 24, Part 2, of the California Code of Regulations, commonly referred to as the CBC. The CBC is updated every three years. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions.

The State of California's noise insulation standards for non-residential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Future individual projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA Leq.

California Department of Transportation

In 2020, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Manual. The manual provides general guidance on vibration issues associated with the construction and operation of projects concerning human perception and structural damage.

State of California General Plan Guidelines

The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State of California General Plan Guidelines, published by the Office of Planning and Research, also provides guidance for the acceptability of projects within specific CNEL/Ldn contours. The guidelines discuss how ambient noise should influence land use and development decisions and includes a table of normally

acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable uses at different noise levels. A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements. The General Plan Guidelines provide cities with recommended community noise and land use compatibility standards that can be adopted or modified at the local level based on conditions and types of land uses specific to that jurisdiction.

LOCAL

City of Costa Mesa General Plan Noise Element

The Noise Element of the City of Costa Mesa General Plan provides goals and policies focused on creating a local noise environment that contributes to positive community health and minimizes exposure of residents to adverse noise conditions. By identifying noise-sensitive land uses and establishing compatibility guidelines for land use and noises, noise considerations will influence the general distribution, location, and intensity of future land uses. The result is that effective land use planning and mitigation can alleviate the majority of noise problems. The City aims to monitor and regulate noise and noise sources that will help maintain the conditions that contribute to the local quality of life.

Table N-2 of the City's General Plan Nosie Element provides interior and exterior noise standards for residential land uses. Exterior residential noise standards establish allowable noise levels of 55 dBA during daytime hours (7:00 a.m. to 11:00 p.m.) and 50 dBA during nighttime hours (11:00 p.m. to 7:00 a.m.). Interior residential noise standards allow 55 dBA during daytime and evening hours and 45 dBA during nighttime hours. Additionally, Table N-3 establishes land use compatibility standards for residential land uses. The Noise Element identifies normally acceptable community noise levels for residential land uses as ranging from 50 dBA CNEL to 60 dBA CNEL.

The Noise Element sets various goals and policies that would apply to projects within the City of Costa Mesa. The following goal, objectives, and policies are applicable to the proposed project:

Goal N-1: *Noise Hazards and Conditions*: The City of Costa Mesa aims to protect residents, local workers, and property from injury, damage, or destruction from noise hazards and to work toward improved noise abatement.

Objective N-1A: Control noise levels within the City for the protection of residential areas, park areas, and other sensitive land uses from excessive and unhealthful noise.

Goal N-2: *Noise and Land Use Compatibility*: Integrate the known impacts of excessive noise on aspects of land use planning and siting of residential and non-residential projects.

Objective N-2A: Plan for the reduction in noise impacts on sensitive receptors and land uses.

- **Policy N-2.1.** Require the use of sound walls, berms, interior noise insulation, double-paned windows, and other noise mitigation measures, as appropriate, in the design of new residential or other new noise sensitive land uses that are adjacent to arterials, freeways, or adjacent to industrial or commercial uses.
- **Policy N-2.2.** Require, as a part of the environmental review process, that full consideration be given to the existing and projected noise environment.
- **Policy N-2.4.** Require that all proposed projects are compatible with adopted noise/land use compatibility criteria.
- **Policy N-2.5.** Enforce applicable interior and exterior noise standards.
- **Policy N-2.6.** Allow a higher exterior noise level standard for infill projects in existing residential areas adjacent to major arterials if it can be shown that there are no feasible mechanisms to meet the exterior noise levels. The interior standard of 45 dBA CNEL shall be enforced for any new residential project.
- **Policy N-2.7**. Encourage effective site planning in mixed-use areas that provides the optimal distance between source of excessive sound and residents.
- **Policy N-2.8**. Require new mixed-use developments to site loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noise sources away from the residential portion of the development and adjacent established residential development.
- **Policy N-2.9**. Limit hours and/or require attenuation of commercial/entertainment operations adjacent to residential and other noise sensitive uses in order to minimize excessive noise to these receptors.

City of Costa Mesa Municipal Code

The City's Municipal Code regulations with respect to noise are included in Title 13, Chapter XIII of the Municipal Code. The Noise Regulations provide noise standards and restrictions within the City. Section 13-279 exempts construction-related noise, provided that construction activities occur between 7:00 a.m. and 7:00 p.m., Monday through Friday, and 9:00 a.m. and 6:00 p.m. on Saturdays. Construction activities are prohibited on Sundays and on the following federal holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Additionally, Section 13-280 and Section 13-281 present exterior and interior noise standards for residential land uses. These standards are presented in Table 3.11-1, *Residential Noise Standards*.

Table 3.11-1 Residential Exterior Noise Standards

Exterior/Interior	Time Period	L50	L25	L8	L2	Lmax
Exterior	7:00 a.m. to 11:00 pm	55	60	65	70	75
	11:00 p.m. to 7:00 am	50	55	60	65	70
Interior	7:00 a.m. to 11:00 pm	--	--	55	60	65
	11:00 p.m. to 7:00 am	--	--	45	50	55

Source: City of Costa Mesa Municipal Code, Section 13-280, and Section 13-281.

Note: dBA = A-weighted decibels, L50=noise level exceeded 50 percent of the time, L25= noise level exceeded 25 percent of the time. L8= noise level exceeded 8 percent of the time, L2= noise level exceeded 2 percent of the time, Lmax = maximum sound level

3.11.2 Existing Conditions

EXISTING AMBIENT NOISE ENVIRONMENT

The existing ambient noise environment in the vicinity of the project site is dominated by roadway traffic, with secondary contributions from surrounding residential land uses. Consistent with the City of Costa Mesa General Plan Noise Element, roadway traffic on arterial and collector roadways represents the primary source of ambient noise within the City. In the project vicinity, traffic along Harbor Boulevard, Fair Drive, Placentia Avenue, Joann Street, and Shelley Circle largely define existing ambient noise conditions. Additional stationary noise sources in the area include routine residential activities, such as dogs barking, landscaping equipment, and other neighborhood-related noise. Institutional land uses, including Estancia High School southwest of the project site across Placentia Avenue, and nearby commercial land uses also contribute periodic noise associated with daily operations and outdoor activities.

The project site is in an area of Costa Mesa predominantly consisting of residential land uses, which are considered noise-sensitive receptors. As a result, the existing ambient noise environment reflects typical conditions for an urban residential area, where baseline sound levels are influenced primarily by roadway traffic with intermittent contributions from nearby land uses.

Existing Ambient Noise Measurements

The project site is in the City of Costa Mesa and generally bounded by the Costa Mesa Country Club to the west, south, and east, with Harbor Boulevard and Tanager Drive beyond. Residential uses are to the north across Shelley Circle. To quantify existing ambient noise levels in the project vicinity, ECORP conducted a series of short-term (15-minute) noise measurements during daytime hours in 2023 and 2025 to characterize typical ambient noise conditions at locations influenced by nearby roadways and surrounding land uses. These short-term

measurements represent existing noise exposure adjacent to the project site during the daytime (see Appendix H.1). Additionally, ECORP conducted long-term noise measurements (24-hour) on the project site in 2023 to determine the noise experienced on the site from the existing noise environment. The average noise levels at each location are listed in Table 3.11-2, *Existing Ambient Noise Measurements*. The locations of these measurements are shown on Figure 3.11-1, *Noise Measurement Locations*.

Conducting noise measurements in multiple years allows for a more accurate characterization of the existing noise environment by accounting for potential variations in traffic volumes, activity patterns, and short-term fluctuations. Multiyear monitoring helps confirm the consistency of dominant noise sources in the project vicinity.

Table 3.11-2 Existing Ambient Noise Measurements

Location Label	Location	CNEL dBA	Leq dBA	Lmin dBA	Lmax dBA	Time
2023 Short-Term Noise Measurements						
ST 1	On a parkway northeast of the intersection of Shelley Circle and Fair Drive.	N/A	57.5	45.2	68.3	10:22 a.m. – 10:37 a.m.
ST 2	On a parkway northeast of the intersection of Florence Circle, Eugenia Way, and Pearl Way.	N/A	50.6	46.4	61.6	10:41 a.m. – 10:56 a.m.
ST 3	North of Shelley Circle and west of a parking lot.	N/A	64.3	44.7	66.3	10:59 a.m. – 11:14 a.m.
ST 4	North of an unnamed road and approximately 40 feet west of Shelley Circle.	N/A	48.0	43.2	63.6	11:17 a.m. – 11:32 a.m.
ST 5	Southwest of the intersection between Shelly Circle and Gregory Way.	N/A	56.1	43.2	76.8	11:36 a.m. – 11:54 a.m.
2023 Long-Term Noise Measurements						
LT 1	On the southeast corner of the Project Site.	52.7	48.7	35.2	80.4	9:25 a.m. – 9:25 a.m.
LT 2	On the northwest corner of the Project Site	54.7	51.9	38.5	86.9	9:47 a.m. – 9:47 a.m.
2025 Short-Term Noise Measurements						
ST 1	Located at the northwest corner of the intersection of North Shelly Circle and Merrimac Way/Gregory Way.	N/A	57.1	40.4	76.8	1:37 p.m. – 1:52 p.m.
ST 2	Near driveway of the residence at 2501 Christopher Lane.	N/A	53.4	40.3	67.1	2:09 p.m. – 2:24 p.m.

Table 3.11-2 Existing Ambient Noise Measurements

Location Label	Location	CNEL dBA	Leq dBA	Lmin dBA	Lmax dBA	Time
ST 3	Located on the north side of Harbor Boulevard, in front of Pacific Auto Center at 2524 Harbor Boulevard.	N/A	75.8	58.4	86.7	3:15 p.m. – 3:30 p.m.
ST 4	Located south of Fair Drive, approximately 70-feet west of Carnegie Avenue.	N/A	70.3	48.3	83.4	2:43 p.m. – 2:58 p.m.
ST 5	Approximately 130-feet north of the intersection of Joann Street and Fountain Way, at the bike path entrance near 610 Joann Street.	N/A	50.4	42.1	68.4	3:45 p.m. – 4:00 p.m.

Source: City of Costa Mesa Municipal Code, Sections 13-280 and 13-281.

Note: dBA = A-weighted decibels, L50=noise level exceeded 50 percent of the time, L25= noise level exceeded 25 percent of the time. L8= noise level exceeded 8 percent of the time, L2= noise level exceeded 2 percent of the time, Lmax = maximum sound level

As shown in Table 3.11-2, ambient noise levels measured at and near the project site range from approximately 48.0 dBA Leq to 75.8 dBA Leq during short-term daytime noise measurements, with the higher levels observed at measurement locations adjacent to Harbor Boulevard. Long-term noise measurements recorded CNEL values ranging from approximately 52.7 dBA to 54.7 dBA. The predominant noise sources in the project vicinity include vehicular traffic on nearby arterial and local roadways, including Harbor Boulevard, Fair Drive, and Shelley Circle, with intermittent contributions from local residential activities occurring in the project vicinity.

Existing Roadway Noise Levels

Existing roadway noise levels were calculated for the roadway segments in the project vicinity. This task was accomplished using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and traffic volumes provided by Fehr and Peers (Appendix J.2). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium- and heavy-duty truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are presented in Table 3.11-3, *Existing Roadway Noise Levels*.

Table 3.11-3 Existing Roadway Noise Levels

Roadway Segment	CNEL at 100 Feet	Distance to CNEL Contour (feet)[1, 2]			
		70 dBA	65 dBA	60 dBA	55 dBA
Adams Avenue					
Between Mesa Verde Drive East and Harbor Boulevard	64.7	-	93	296	+500
Victoria Street					
Between Mesa Verde Drive East and Harbor Boulevard	65.6	-	114	360	+500
West 19th Street					
Between Meyer Place and Park Avenue	62.3	-	54	171	+500
Harbor Boulevard					
Between Gisler Avenue and Nutmeg Place	68.3	-	213	+500	+500
Between Adams Avenue and Merrimac Way	64.5	-	90	284	+500
Between Fair Drive and Wilson Street	66.3	-	133	420	+500
Between West Bay Street and Ford Road	67.0	-	158	500	+500
Newport Boulevard					
Between West 18th Street and Harbor Boulevard	71.3	134	422	+500	+500
Fair Drive					
Between Fordham Drive and Loyola Road	62.5	-	57	180	+500
Between Vanguard Way and Newport Boulevard	64.2	-	84	264	+500

Source: Appendix H.1.

1. Distances to CNEL contours do not account for the noise attenuation attributable to intervening structures.
2. All contour distances from fully developed areas are capped at 500 feet from roadway centerlines.

As shown, the existing traffic generated noise level on project vicinity roadways currently ranges from 62.3 dBA CNEL to 71.3 dBA CNEL at a distance of 100 feet from the centerline. As previously described, CNEL is a 24-hour average noise metric that incorporates a 10 dBA weighting applied to noise occurring during the nighttime hours of 10:00 p.m. to 7:00 a.m. and a 5 dBA weighting applied to noise occurring during the evening hours from 7:00 p.m. to 10:00 p.m., to account for increased noise sensitivity during these periods. It should be noted that the modeled noise levels in Table 3.11-3 differ from the short-term measurement levels in Table 3.11-2 because the short-term measurements represent noise levels at various locations around the project area as well as noise generated by non-transportation sources. The short-term measurements are also reported in a different noise metric (e.g., short-term noise measurements are the Leq values and traffic noise levels are reported in CNEL).



Source: Nearmap 2025; ECORP 2026.

Figure 3.11-1
Noise Monitoring Locations

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3.11.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to noise if it would:

a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b) Generate excessive groundborne vibration or groundborne noise levels.

c) For a project within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

THRESHOLD GUIDANCE

Construction Noise and Vibration

For the purposes of this analysis, potential project construction noise is compared to the allowable hours of construction mandated by Title 13, Chapter XIII, Section 13-279 of the City's Municipal Code. The City does not regulate vibrations associated with construction. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, the Caltrans-recommended standard of 0.3 inch per second PPV with respect to the prevention of structural damage for older residential buildings is used as a threshold. This is also the level at which vibrations may begin to annoy people in buildings.

Transportation Noise

The City has not established a transportation noise threshold; however, Policy N-1.1 seeks to limit noise exposure in residential neighborhoods to 65 dBA CNEL. As shown in Table 3.11-3, existing transportation noise levels along roadways in the project vicinity already equal or exceed 65 dBA CNEL without the proposed project. Therefore, potential increases in transportation-related noise are evaluated using the FICON recommendations for assessing traffic noise increases. Under this analysis, traffic noise levels are considered significant if the project's contribution to traffic noise at buildout exceeds the applicable dBA CNEL increase for the studied roadway segment.

- If the existing ambient noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.) are less than 60 dBA CNEL and the project creates a readily perceptible 5 dBA CNEL or greater noise level increase, or
- If the existing noise levels range from 60 to 65 dBA CNEL and the project creates a barely perceptible 3 dBA CNEL or greater noise level increase, or
- If the existing noise levels already exceed 65 dBA CNEL and the project creates a community noise level increase of greater than 1.5 dBA CNEL.

On-Site Operational Noise and Vibration

On-site operational noise generated as a result of future development instigated by the project is compared to the City's maximum allowable exterior and interior noise standards identified in Table 3.11-1. The City does not regulate vibrations associated with operations. However, a discussion of vibration is included for full disclosure purposes.

Land Use Compatibility

Developing new sensitive land uses near sources of noise emissions could expose persons that inhabit these sensitive land uses to potential noise levels that exceed the City's sound level standards. However, the purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project. As a result of the California Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (No. S 213478) issued December 17, 2015), it is generally no longer the purview of the CEQA process to evaluate the impact of existing environmental conditions on any given project. Therefore, CEQA does not require an analysis of the potential environmental effects from siting sensitive receptors near existing sources. However, for informational and disclosure purposes, and to demonstrate consistency with the City's General Policy N-2.4, which requires that all proposed projects be compatible with adopted noise/land use compatibility criteria, this analysis evaluates land use compatibility for the proposed project with land uses in the project area. Consistent with General Plan Policy N-2.4, land use compatibility is evaluated using the long-term ambient noise measurements in Table 3.11-2, which represent existing 24-hour CNEL noise conditions and provide the basis for assessing the compatibility of proposed land uses with the surrounding noise environment.

METHODOLOGY

This is a program-level analysis that considers the potential impacts from the proposed project by assessing the potential development and activities under it. The proposed project does not propose specific development projects but, for the purposes of environmental review, establishes the potential buildout of the FDCSP, which is the maximum feasible development

throughout the project site. This analysis of the existing and future noise environments is based on noise prediction modeling and empirical observations. To capture the potential impact of future development under the proposed project, this analysis utilizes the baseline existing conditions described above and analyzes the impacts of urban development.

Predicted construction noise levels associated with the potential development allowed under the project are calculated utilizing the FHWA's Roadway Construction Noise Model. Groundborne vibration levels associated with construction-related activities for the project have been evaluated utilizing typical groundborne vibration levels associated with construction equipment. Potential groundborne vibration impacts related to structural damage and human annoyance were evaluated, taking into account the distance from construction activities to nearby structures and typically applied criteria for structural damage and human annoyance.

Roadside noise levels were calculated for the same roadways analyzed under existing conditions. Transportation-source noise levels in the project vicinity were calculated using the FHWA Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes provided by Fehr and Peers (see Appendix J.2). The scenarios modeled for the traffic analysis include the following:

- **Existing Year (2025) Without Project**: represents the traffic trips under existing conditions. Traffic noise under this scenario is shown in Table 3.11-3.
- **Cumulative Year (2045) Without Project**: represents the traffic trips anticipated in 2045, which accounts for growth in the region under the Orange County Transportation Analysis Model and trips from cumulative development projects.
- **Cumulative Year (2045) With Project**: represents the traffic trips anticipated in 2045 added to traffic trips from the proposed project at its full buildout.

The proposed project would be fully built out by 2045. Therefore, traffic noise levels are evaluated based on whether the project's noise increase from the "Cumulative Year (2045) With Project" scenario exceeds the noise levels under the "Cumulative Year (2045) Without Project" scenario by the applicable increase threshold for each roadway segment, since this increase represents the project's contribution to traffic noise. Traffic noise levels under this analysis are based on the CNEL at 100 feet from the roadway segment (i.e., the centerline of the road).

On-site stationary source noise levels associated with the proposed project have been modeled with typical noise sources found at nonresidential land uses, which are expected to be the primary contributors to operational stationary noise. Modeled noise levels are based on reference noise levels. Reference noise levels are collected from field noise measurements and other published sources from similar types of activities and are used to estimate noise levels expected with the project's non-transportation noise sources. The reference noise levels are used to represent a worst-case noise environment because noise levels from potential area and

point sources on the project site (e.g., drive-thru queue, drive-thru speaker, parking lot activity) can vary throughout the day.

3.11.4 Project Impact Analysis

a) Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

TEMPORARY CONSTRUCTION NOISE

Under the proposed project, the primary source of temporary noise within the project site would be construction activities associated with development projects and activities. Construction activities would involve both off-road construction equipment (e.g., excavators, dozers, cranes) and transport of workers and equipment to and from construction sites. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., site preparation, excavation, paving).

Noise generated by construction equipment, including earth movers, pile drivers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site.

Construction noise is currently an intermittent source of temporary noise in Costa Mesa. Since the construction details of development under the proposed project are unknown at this time, it is conservatively assumed that the construction areas associated with these future projects could be within 50 feet of sensitive land uses. As depicted in Table 3.11-4, *Reference Noise Levels for Construction Equipment*, noise levels generated by individual pieces of construction equipment typically range from approximately 74.0 dBA to 101.3 dBA Lmax at 50 feet and 67.7 dBA to 94.3 dBA Leq at 50 feet.

Average hourly noise levels associated with construction projects can vary depending on the activities performed. Short-term increases in vehicle traffic, including worker commute trips and haul truck trips, may also result in temporary increases in ambient noise levels at nearby receptors. During each stage of construction, a different mix of equipment would operate, and noise levels would vary based on the amount of equipment on-site and the location of the activity. Construction noise levels drop off at a rate of about 6 dBA per doubling of distance

between the noise source and the receptor. Intervening structures or terrain would result in lower noise levels at distant receivers.

Table 3.11-4 Reference Noise Levels for Construction Equipment

Equipment	Typical Noise Level (dBA) at 50 Feet from Source	
	Lmax	Leq
Aerial Lift	74.7	67.7
Air Compressor	77.7	73.7
Backhoe	77.6	73.6
Blasting	94.0	73.0
Boring Jack (Power Unit)	83.0	80.0
Boring Jack (Horizontal)	82.0	76.0
Chain Saw	83.7	76.7
Compactor (Ground)	83.2	76.2
Concrete Mixer Truck	78.8	74.8
Concrete Mixer (Vibratory)	80.0	73.0
Concrete Pump Truck	81.4	79.4
Concrete Saw	89.9	82.6
Crane	80.6	72.6
Dozer	81.7	77.7
Drill Rig	84.4	77.4
Drill Rig Truck	79.1	72.2
Drum Mixer	80.0	77.0
Dump Truck	76.5	72.5
Excavator	80.7	76.7
Front End Loader	79.1	75.1
Generator	80.6	77.6
Gradall	83.4	79.4
Grader	85.0	81.0
Hydraulic Break Ram	90.0	80.0
Impact Hammer/Hoe Ram (Mounted)	90.3	83.3
Jackhammer	88.9	81.9
Other Equipment	85.0	82.0

Table 3.11-4 Reference Noise Levels for Construction Equipment

Equipment	Typical Noise Level (dBA) at 50 Feet from Source	
	Lmax	Leq
Pavement Scarifier	89.5	82.5
Paver	77.2	74.2
Pile Driver (Impact)	101.3	94.3
Pile Driver (Vibratory)	100.8	93.8
Pneumatic Tools	85.2	82.2
Pumps	80.9	77.9
Rock Drill	81.0	74.0
Roller	80.0	73.0
Scraper	83.6	79.6
Tractor	84.0	80.0
Truck (Flat Bed)	74.3	70.3
Truck (Pick Up)	75.0	71.0
Vacuum Street Sweeper	81.6	71.6
Welder	74.0	70.0

Source: Appendix H.1.

The nearest noise-sensitive receptors to the project site include existing residential land uses immediately north of the project boundary across Shelley Circle. Additional noise-sensitive receptors in the vicinity include residential neighborhoods east of the site along Harbor Boulevard, residential land uses south of the site along Joann Street, and Estancia High School to the southwest of the project site across Placentia Avenue.

The City's Municipal Code provides exemptions for construction activities as long as they comply with time and day limits, however, in order to remain compliant with the City's regulations, future construction under the project would be required to comply with additional measures to minimize potential temporary construction noise impacts to nearby noise-sensitive receptors. Therefore, construction noise impacts under the proposed project would be **potentially significant**.

Significance without Mitigation: Potentially Significant.

Impact NOI-1: The proposed project could result in significant temporary increases in noise associated with construction activities.

Mitigation Measure NOI-1: All future development allowed under the Fairview Developmental Center Specific Plan shall be required to implement the following construction noise control measures:

- Unless permitted by the City's Building Safety Division and/or Public Works Department for activities that necessitate nighttime construction, all future development allowed under the Specific Plan shall restrict construction activities to the noise exempt hours established in the City of Costa Mesa Municipal Code, Title 13, Chapter XIII, Section 13-279, which exempts construction noise generated between 7:00 a.m. and 7:00 p.m., Monday through Friday, and 9:00 a.m. to 6:00 p.m. on Saturdays from noise standards. Construction activities associated with all future development shall be prohibited on Sundays and the following federal holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.
- All future development allowed under the Specific Plan shall require that all construction equipment, fixed or mobile, be equipped with properly operating and maintained mufflers and other manufacturer recommended noise attenuation devices.
- All future development allowed under the Specific Plan shall require that construction equipment be shut off when not in use, to the greatest extent feasible.
- All future development allowed under the Specific Plan shall locate construction staging areas, material stockpiles, and stationary construction equipment as far as feasible from existing noise-sensitive receptors.
- All future development allowed under the Specific Plan shall, where feasible, position stationary construction equipment so that noise emissions are directed away from nearby noise-sensitive receptors.
- All future development allowed under the Specific Plan shall, prior to construction activities that warrant nighttime construction (e.g., infrastructure work, concrete pours, etc.), noise pathway controls shall be installed, including noise barriers and enclosures free from gaps and holes, and placed as close as possible to construction areas by the construction contractor. Temporary noise barriers shall be of sufficient height, a minimum of eight feet tall, to block the direct line-of-sight between the on-site construction areas and off-site noise sensitive receptors and shall be

constructed out of wood or other materials with a minimum surface weight of approximately 2.5 pounds per square foot.

Significance with Mitigation: Less than significant. Mitigation Measure NOI-1 would ensure compliance with City Municipal Code requirements and City construction guidelines to decrease noise levels from future projects under the FDCSP to the extent possible. Therefore, temporary construction noise impacts associated with future development under the proposed project would be reduced to a less than significant level.

PERMANENT OPERATION NOISE

Traffic Noise

Future traffic noise levels throughout the project vicinity (i.e., vicinity roadway segments that traverse noise sensitive land uses) were modeled based on traffic volumes provided by Fehr and Peers (Appendix J.2) to determine the noise levels along project vicinity roadways. Table 3.11-5, *Project Traffic Noise Impacts*, shows the calculated off-site roadway noise levels under the Cumulative Year (2045) With Project scenario compared to both Existing Year (2025) Without Project noise levels and Cumulative Year (2045) Without Project noise levels. The proposed project's contribution to traffic noise is represented by the difference between the Cumulative Year (2045) With Project scenario and the Cumulative Year (2045) Without Project scenario.

The Existing Year (2025) Without Project scenario is also compared to the Cumulative Year (2045) With Project scenario to show overall growth in traffic noise at the buildout year of the proposed project. Because the Cumulative Year (2045) With Project scenario includes traffic from both the proposed project and other future projects, including anticipated growth in the region and specific cumulative projects in the city, its comparison to the Existing Year (2025) Without Project scenario includes traffic from future projects that are not a part of the proposed project.

As shown in Table 3.11-5, traffic noise levels at one roadway segment, Fair Drive between Fordham Drive and Loyola Road, would increase by over 3 dBA CNEL between existing conditions and future buildout conditions with the proposed project. However, the proposed project's contribution to noise levels at this segment would not exceed 3dBA CNEL but only contribute a 1 dBA CNEL increase; the remaining increase can be attributed to growth in traffic from other future projects. Table 3.11-5 also shows that the project's contribution to traffic noise levels would be up to 2 dBA CNEL and would not exceed applicable thresholds for all roadway segments studied. The difference in noise levels between the Cumulative Year (2045) With Project and Cumulative Year (2045) Without Project scenarios does not exceed the applicable threshold at any roadway segments studied. Therefore, traffic noise impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

Table 3.11-5 Project Traffic Noise Impacts

Roadway Segment	CNEL at 100 Feet		Increase Between 2045 With Project and 2045 No Project	Standard	Project Contribution Exceed Standard?[1]
	2045 No Project	2045 With Project			
Adams Avenue					
Between Mesa Verde Drive East and Harbor Boulevard	64.5	64.8	+0.3	3	No
Victoria Street					
Between Mesa Verde Drive East and Harbor Boulevard	65.6	65.8	+0.2	1.5	No
West 19th Street					
Between Meyer Place and Park Avenue	63.8	63.8	+0.0	3	No
Harbor Boulevard					
Between Gisler Avenue and Nutmeg Place	68.7	69.4	+0.7	1.5	No
Between Adams Avenue and Merrimac Way	65.6	67.1	+1.5	3	No
Between Fair Drive and Wilson Street	66.6	67.4	+0.9	1.5	No
Between West Bay Street and Ford Road	68.0	68.2	+0.2	1.5	No
Newport Boulevard					
Between West 18th Street and Harbor Boulevard	71.6	71.6	+0.0	1.5	No
Fair Drive					
Between Fordham Drive and Loyola Road	64.7	65.9	+1.2	3	No
Between Vanguard Way and Newport Boulevard	65.3	66.3	+1.0	3	No

Source: Appendix H.1.

1. The project's contribution to traffic noise in the buildout year is represented by the increase between 2045 With Project and 2045 With Project noise levels.

Project Operational Stationary Noise

Implementation of the proposed project would result in a predominantly residential development, with neighborhood-serving commercial uses incorporated to support the community. While residential uses are not typically associated with substantial stationary noise sources, the commercial components of the project have the potential to generate the highest levels of operational stationary noise. Potential stationary noise sources associated with commercial uses include heating, ventilation, and air conditioning (HVAC) equipment, refrigeration and mechanical equipment, parking lot activity, loading and service operations, and, where applicable, emergency backup generators. Accordingly, the analysis of on-site stationary noise sources focuses on representative noise sources associated with the proposed commercial uses. Table 3.11-6, *Reference Noise Levels for Stationary Sources*, identifies noise levels generally associated with common commercial stationary noise sources.

Table 3.11-6 Reference Noise Levels for Stationary Sources

Stationary Noise Source	Leq at the Noise Source
Commercial Car Wash[1]	79.1 dBA
Drive Thru Activity (speaker)[2]	89.1 dBA
Gasoline Dispensing Station[3]	64.7 dBA
Generators[4]	75.0 dBA
HVAC Mechanical Equipment[5]	56.8 dBA
Parking Garage[6]	52.6 dBA
Regional Shopping Center Parking Lot[7]	61.1 dBA
Small Parking Lot[8]	53.2 dBA
Tire and Lube Service Station[9]	62.3 dBA
Truck Backup Beeper[10]	79.0 dBA
Truck Yard/Warehouse[11]	62.4 dBA

Source: Appendix H.1.

1. The average of two noise measurements conducted at commercial carwashes in 2019 and 2022.
2. The average of six noise measurements conducted within fast food restaurant drive-thru while drive-thru speaker in use.
3. The average of five noise measurements conducted within the fuel canopy of gasoline dispensing stations in 2019 and 2021.
4. Generac Mobile Diesel Generator Set Specification Sheet 2020.
5. One noise measurement conducted at an operating HVAC unit in 2017.
6. One noise measurement conducted within a parking garage in 2019.
7. One noise measurement conducted within a Safeway parking lot in 2019.
8. The average of three noise measurements conducted within a strip mall parking lot in 2022, hotel parking lot in 2021, and medical facility parking lot in 2020.
9. The average of two noise measurements conducted at a Big O Tires in 2019 and a Jiffy Lube in 2022.
10. City of San Jose 2014 Midpoint at 237 Loading Dock Noise Study.
11. The average of five noise measurements conducted at four truck yards and one distribution center in 2021.

The City of Costa Mesa General Plan Noise Element contains policy provisions that protect against substantial exposure to non-transportation noise and require the integration of noise considerations into land use planning decisions to minimize noise impacts associated with new development, including stationary noise sources. General Plan Policy N-2.2 requires that, as part of the environmental review process, full consideration be given to the existing and projected noise environment. In addition, Policy N-2.5 requires enforcement of applicable interior and exterior noise standards.

General Plan Policies N-1.4 and N-2.1 further require that appropriate site design and noise mitigation measures be incorporated into new residential or other noise-sensitive land uses, where necessary, to achieve acceptable interior and exterior noise levels. Accordingly, future development under the proposed project would be subject to City review and, where applicable, would be required to prepare project level acoustical analyses to demonstrate compliance with the Noise Element and Municipal Code noise standards. Noise generated by new or modified non-transportation noise sources would be required to be controlled so as not to exceed applicable noise standards at nearby residential and other noise-sensitive land uses (see Table 3.11-1).

The mitigation available to reduce noise from non-transportation noise sources generally falls into three main categories: source control, path control, and receptor control. Examples of source control mitigation measures include the use of quieter machinery, if available, and ensuring regular maintenance to replace worn components. Limiting the hours of operating the noise source, particularly during the nighttime hours and weekends, can also mitigate noise impacts on noise-sensitive residential land uses. Another example of source control noise mitigation is the installation of acoustically treated enclosures around a noise source and/or housing noise machinery in buildings to contain the generated noise.

An example of a non-transportation noise-reducing path control mitigation measure includes the strategic placement of a barrier between the noise source and receptor. A solid wall or berm generally reduces noise levels by 5 to 10 dBA. To achieve the most potent noise-reducing effect, a noise enclosure/barrier must physically fit in the available space, must completely break the “line of sight” between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend lengthwise and vertically as far as feasibly possible to be most effective. The limiting factor for a noise barrier is not the component of noise transmitted through the material, but rather the amount of noise flanking around and over the barrier. In general, barriers contribute to decreasing noise levels only when the structure breaks the "line of sight" between the source and the receiver.

Other examples of path control noise mitigation include the establishment of distance/buffer zones as well as the positioning of buildings or other structures to shield sensitive areas from noise sources. Lastly, receptor control mitigation involves noise-reducing measures at the noise

receptor. Examples of this form of mitigation include the installation of advanced building sound insulation involving windows, doors, and walls.

In summary, the City of Costa Mesa General Plan Noise Element, including Policies N-1.4, N-2.1, N-2.4, and N-2.5, requires that noise generated by new or modified non-transportation noise sources be controlled through appropriate site design and mitigation measures so as not to exceed applicable interior and exterior noise standards at residential and other noise-sensitive land uses. Compliance with these General Plan policies would ensure that future development and activities under the proposed project would result in a **less than significant impact** related to stationary noise sources.

Significance without Mitigation: Less than significant.

Land Use Compatibility

Buildout of the FDCSP could result in siting sensitive uses (e.g., residential) near major sources of noise and vibration (roadways, commercial uses, etc.). Developing new sensitive land uses near sources of noise emissions could expose persons that inhabit these sensitive land uses to potential noise levels that exceed the City's sound level standards. Though the impact of the environment on a project is not the focus of CEQA, the City's General Policy N-2.4 requires that all proposed projects be compatible with adopted noise/land use compatibility criteria. Therefore, this analysis evaluates land use compatibility for proposed project with existing uses in the project vicinity.

Table N-3 of the City's General Plan Noise Element establishes land use compatibility criteria for residential land uses based on community noise exposure levels expressed in CNEL. The Noise Element identifies normally acceptable community noise levels for residential land uses as ranging from 50 dBA CNEL to 60 dBA CNEL. As summarized in Table 3.11-2, long-term noise measurements conducted on the project site measured CNEL values of 52.7 dBA and 54.7 dBA. These measured noise levels fall within the range identified by the Noise Element as normally acceptable for residential land uses and indicate that the existing noise environment is generally compatible with the residential uses proposed under the Specific Plan.

The proposed project would redevelop the site with a mix of residential and neighborhood-serving commercial uses. Consistent with General Plan Goals N-1 and N-2 and Objectives N-1A and N-2A, the FDCSP incorporates site planning and development standards intended to minimize noise exposure to sensitive receptors. Policies N-1.4, N-2.1, N-2.7, and N-2.8 require effective site design and the strategic placement of buildings, loading areas, parking areas, driveways, trash enclosures, and mechanical equipment to reduce noise exposure to residential areas. In addition, Policy N-1.5 requires compliance with Title 24 of the California Code of Regulations to ensure acceptable interior noise levels within new residential units. While the FDCSP establishes a planning level framework for redevelopment, future development projects on the project site would be subject to discretionary review and environmental evaluation

pursuant to Policy N-2.2. As part of this review, project level noise analyses would be required, as appropriate, to assess compliance with applicable interior and exterior noise standards and land use compatibility criteria, consistent with Policies N-2.4 and N-2.5. Where necessary, project-specific noise attenuation measures such as site design, building orientation, architectural treatments, and noise barriers would be implemented to ensure compatibility with surrounding noise conditions.

In summary, noise levels on the project site fall within the City's normally acceptable range for residential land uses, and adherence to the City of Costa Mesa General Plan Noise Element policies would ensure that future development under the Specific Plan would be compatible with the existing and projected noise environment. Therefore, impacts related to noise and land use compatibility would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project generate excessive groundborne vibration or groundborne noise levels?

CONSTRUCTION VIBRATION

Under the proposed project, the primary source of groundborne vibration would result from construction activities associated with development projects and activities pursuant to the FDCSP. Future construction activities under the proposed project would occur within the project site and will most likely require the use of off-road equipment which would generate small levels of vibration.

Construction activities that generate excessive vibration, such as blasting, would not be expected for future development due to the topography of the project site, which is mostly flat and devoid of rock outcroppings. The majority of construction equipment used during future construction allowed by the proposed project would not be situated at any one location during construction activities, but spread throughout a construction site and at various distances from sensitive receptors. Since specific future projects under the proposed project are unknown at this time, it is conservatively assumed that the construction areas associated with these future projects could be located within 50 feet of sensitive structures. The primary vibration-generating activities are during grading, placement of underground utilities, and construction of foundations. Table 3.11-7, *Representative Vibration Levels for Construction Equipment,* shows the typical vibration levels produced by construction equipment at 50 feet.

Table 3.11-7 Reference Noise Levels for Stationary Sources

Equipment	Peak Particle Velocity at 50 Feet (inches per second)	Vibration Level Vibration Velocity at 50 Feet (VdB)
Pile Driver (Impact)	0.225	95
Pile Driver (Sonic)	0.059	84
Vibratory Roller	0.073	85
Hoe Ram	0.031	78
Large Bulldozer	0.031	78
Caisson Drilling	0.031	78
Loaded Trucks	0.026	77
Jackhammer	0.012	70
Small Bulldozer	0.001	49

Source: Appendix H.1.

As shown in Table 3.11-7, vibration as a result of future construction activities would not exceed 0.3 PPV at 50 feet. Thus, standard construction activities under the proposed project would not exceed the recommended threshold. Additionally, Mitigation Measure NOI-1 requires all future development under the proposed project to be restricted to the noise-exempt hours in the City's Municipal Code. Adherence to the Municipal Code would ensure that vibration exposure is being reduced to minimize temporary construction-related vibration impacts. Construction vibration under the proposed project would be **less than significant**.

OPERATIONAL VIBRATION

The primary potential source of operational groundborne vibration associated with buildout of the proposed project would be vehicular traffic, including occasional heavy-duty truck travel associated with the proposed neighborhood serving commercial uses. According to Caltrans guidance, heavy-duty trucks traveling on paved roadways rarely generate vibration amplitudes high enough to cause structural or cosmetic damage. Localized, short duration vibration events may occur where pavement irregularities such as potholes or surface discontinuities are present; however, these events are typically intermittent, last only a few seconds or less, and decrease rapidly with distance from the roadway. As a result, cumulative vibration effects from multiple vehicles are unlikely, as additional trucks increase the frequency of vibration events rather than the magnitude of vibration levels.

The FTA Transit Noise and Vibration Impact Assessment Manual indicates that heavy-duty trucks traveling at approximately 30 miles per hour typically generate vibration levels on the order of 0.007 inches per second PPV at a distance of 50 feet. Project heavy-duty trucks traversing roadways in the project vicinity could potentially drive at speeds greater than 30 miles per hour

during operations. Assuming average heavy-duty truck speeds of 55 miles per hour along, project heavy-duty trucks would generate vibration levels of approximately 0.01 inches per second PPV at 50 feet.[2] Therefore, project-related truck traffic would not surpass 0.3 inch per second. In addition, vibration generated by stationary equipment such as HVAC units, compressors, or emergency generators associated with commercial uses would be limited in intensity and duration and would be subject to standard equipment design and installation practices intended to minimize vibration transmission. Therefore, impacts associated with operational vibration would be **less than significant**.

Significance without Mitigation: Less than significant.

c) For a project within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The project site is approximately 2.5 miles southwest of John Wayne Airport. Figure N-3 of the City of Costa Mesa General Plan Noise Element depicts the adopted John Wayne Airport noise contours based on the most recent Airport Land Use Compatibility planning data. Because these contours extend beyond the City of Santa Ana's jurisdictional boundaries and represent the applicable airport noise planning framework for the surrounding area, Figure N-3 provides a reliable regional reference for evaluating potential airport-related noise exposure. As shown in Figure N-3, the project site is outside of all airport noise contours for John Wayne Airport. Therefore, the proposed project would not expose people working or residing on the project site to excess airport noise levels. No impact would occur.

Significance without Mitigation: No impact.

3.11.5 Cumulative Impact Analysis

The geographic scope for noise and vibration impacts is generally limited to the local vicinity of a project site where receptors could experience noise and vibration from the proposed project in addition to that of other projects combined with the proposed project. If construction of the proposed project were to overlap with cumulative projects in the vicinity, construction noise could result in a significant cumulative construction noise impact. Typically, if there are no planned or approved projects within 500 feet of the proposed project, there is no cumulative construction noise impact.

[2] Calculated using the formula provided in the FTA Transit Noise and Vibration Impact Assessment Manual: Adjusted Speed VdB = 20log (speed/speed reference [30 mph]).

For traffic noise, the scope of cumulative impacts account for regional growth at roadway segments impacted by the proposed project modeled under the Orange County Transportation Analysis Model and growth from the specific cumulative projects listed in Table 3-1, *Cumulative Projects*, in Chapter 3, *Environmental Analysis*.

Would the project have a cumulative effect related to noise?

CONSTRUCTION NOISE

As shown in Table 3-1, other projects in the vicinity of the proposed project could overlap with construction of the proposed project. As discussed in Impact Discussion a), noise levels generated by individual pieces of construction equipment typically range from approximately 74 dBA to 101.3 dBA Lmax at 50 feet and 67.7 dBA to 94.3 dBA Leq at 50 feet. The City has established and enforces noise standards for construction activity, including the establishment of hours when construction noise is exempt. The Municipal Code's Title 13, Chapter XIII, Section 13-279, exempts construction-related noise between 7:00 a.m. and 7:00 p.m., Monday through Friday, and between 9:00 a.m. and 6:00 p.m. on Saturdays. Construction activities are prohibited on Sundays and on the following federal holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Therefore, although the potential exists for construction under the proposed project and other foreseeable development to occur simultaneously and in proximity to one another, construction equipment operations would operate within the constraints of the City's Municipal Code. Implementation of Mitigation Measure NOI-1 would also ensure that construction impacts under the proposed project are minimized to the extent feasible and comply with City standards. Cumulative projects subject to review under CEQA would also be required to implement construction noise mitigation measures to reduce impacts if necessary. Therefore, construction noise impacts would not be cumulatively considerable and the proposed project's impact would be less than significant.

Significance with Mitigation: Less than significant.

TRAFFIC NOISE

Cumulative traffic noise levels with project traffic and without project traffic are shown in Table 3.11-5. The Cumulative Year (2045) Without Project scenario represents the growth in traffic levels associated with other projects and growth in the region and excludes the proposed project, while the Cumulative Year (2045) With Project accounts for both the growth in traffic from other projects/regional growth and growth associated with the proposed project. Therefore, as shown in Table 3.11-5, the proposed project would not contribute to a cumulatively considerable increase in traffic noise at any studied roadway segments. Cumulative traffic noise impacts would be less than significant.

Significance without Mitigation: Less than significant.

OPERATIONAL NOISE

Long-term stationary noise sources associated with the development and activities under the proposed project, combined with other cumulative projects, could cause local noise level increases. However, the City's General Plan policies require the evaluation of development projects to ensure that noise levels meet the City's thresholds and standards. Adherence with these policies would ensure that future development under the proposed project and cumulative development combined would not create cumulatively considerable stationary noise sources. Therefore, cumulative operational noise impacts from stationary sources would be less than significant.

Significance without Mitigation: Less than significant.

VIBRATION

The potential for a cumulative vibration-related damage impact is minimal as vibration impacts are based on approximate groundborne vibration levels. Thus, worst-case groundborne vibration levels from construction are determined by whichever individual piece of equipment generates the highest vibration levels. Unlike the analysis for average noise levels, in which noise levels of multiple pieces of equipment can be combined to generate a maximum combined noise level, multiple vibration sources do not combine to create increased vibration. Vibration from multiple construction sites, even if they are located close to one another, would not combine to raise the maximum vibration. Therefore, vibration impacts resulting from construction of future development under the proposed project would not combine with vibration effects from cumulative projects in the vicinity and the impact would be less than significant.

Significance without Mitigation: Less than significant.

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3.12 POPULATION AND HOUSING

This section of the DEIR evaluates the potential for the Fairview Developmental Center Specific Plan to impact population and housing in the City of Costa Mesa. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary.

Notice of Preparation Comments

The City received one comment letter from the Southern California Association of Governments (SCAG) on November 21, 2025, for the Notice of Preparation (NOP). The comment letter notes SCAG provides growth projections for the region and coordinates with the City for assessment of growth impacts. The relevant SCAG growth projections are incorporated into this section. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, Introduction, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the comment letters.

3.12.1 Regulatory Framework

STATE

California Housing Element Law

California planning and zoning law require each city and county to adopt a General Plan for future growth (California Government Code Section 65300). This plan must include a Housing Element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, the Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth in each county based on California Department of Finance population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments (COG), the HCD provides the RHNA to the board. The council then assigns a share of the regional housing needs to each city and county. HCD oversees the process to ensure that the COG distributes its share of the state's projected housing needs to its member cities and counties.

California Housing Element law (Government Code Sections 65580 to 65589) requires that each city and county identify and analyze existing and projected housing needs in its jurisdiction, identify adequate sites to accommodate the development potential in the RHNA, and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community, commensurate with local housing needs.

Housing Accountability Act

The Housing Accountability Act (HAA) requires that cities approve applications for residential development that are consistent with a City's General Plan and zoning code development standards without reducing the proposed density. Examples of objective standards are those that are measurable and have clear criteria that are determined in advance, such as numerical setback, height limit, universal design, lot coverage requirement, or parking requirement. Under the HAA, an applicant is entitled to the full density allowed by the zoning and/or general plan provided the project complies with all objective general plan, zoning, and subdivision standards and provided that the full density proposed does not result in a specific, adverse impact on public health and safety that cannot be mitigated to less than significant.

Assembly Bill (AB) 678 amends the HAA by increasing the documentation and standard of proof required for a local agency to legally defend its denial of low- to moderate-income housing development projects. If the local agency considers the housing development project to be inconsistent, not in compliance, or not in conformity, this bill requires the local agency to give the applicant, within specific time periods, written documentation identifying the provision or provisions and an explanation of the reason or reasons it considers the housing development to be inconsistent, not in compliance, or not in conformity. If the local agency fails to provide this documentation, the housing development project is deemed consistent, compliant, and in conformity with the applicable plan, program, policy, ordinance, standard, requirement, or other similar provision.

Senate Bill 330

Senate Bill (SB) 330, the Housing Crisis Act of 2019, enacted in 2019, aimed to streamline housing development processes in California by limiting local governments' ability to impose restrictions that could hinder housing production. SB 330 states an application is deemed complete if a preliminary application was submitted and it complied with the applicable general plan and zoning standards in effect at the time. Planning and zoning law requires a public hearing on a variance from the requirements of a zoning ordinance or a conditional use permit. This bill prohibits any city or county from conducting more than five hearings pursuant to these provisions if a housing development project complies with the applicable general plan and zoning standards in effect at the time the application is deemed complete. Additionally, this bill reduces the time within which a lead agency can approve or disapprove a project, from 120 days to 90 days. AB 130 (2025) removed the sunset date for this Housing Crisis Act provision, introduced in Senate Bill 8 in 2021, allowing this practice to remain in effect to facilitate housing development.

Senate Bill 166: No Net Loss Law

SB 166 builds on existing laws and regulations to ensure a local agency meets its allocated RHNA for lower- and moderate-income housing. This bill requires that adequate housing development site capacities are available throughout the Housing Element planning period to meet the unmet RHNA needs. SB 166 requires a local jurisdiction to make specified findings if a housing development project on a site identified to accommodate the City's lower- and moderate-income RHNA develops with another use or a lower residential density development. If a site identified for lower- and moderate-income housing development is permitted for another use or developed at a lower density, and this reduces the local agency's available site capacity from meeting its RHNA for lower- and moderate-income residential housing, then the local agency must identify an additional site or sites to accommodate the loss in site capacity for lower- and moderate-income housing development within 180 days that will meet the RHNA.

Bonus Density Law

The State Density Bonus Law, codified in California Government Code Section 65915, is designed to encourage the development of affordable housing by offering developers certain incentives/concessions and unlimited development waivers. The law allows developers to build more units than typically permitted by local zoning laws if they agree to include a specified percentage of affordable housing units in their projects. The amount of bonus density varies based on the percentage and type of affordable units provided in a housing development project.

REGIONAL

Southern California Association of Governments

Southern California Association of Governments (SCAG) is a council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is the federally recognized metropolitan planning organization (MPO) for this region, which encompasses over 38,000 square miles. It serves as a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG develops, refines, and maintains SCAG's regional and small area socioeconomic forecasting/allocation models. SCAG is responsible for analyzing the region's transportation system, the future of growth in the region, and potential funding sources to address housing, transportation, and livability issues for the 18 million residents that call Southern California home. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs and forecast. As the southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in

preparing regional planning documents. The City of Costa Mesa is within the Orange County Council of Governments subregion of SCAG.

SCAG 2040-2050 Regional Transportation Plan / Sustainable Communities Strategy

On April 4, 2024, SCAG's Regional Council adopted the 2040-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which places a greater emphasis than SCAG's previous RTP/SCS on sustainability and integrated planning. The 2024 RTP/SCS provides the goals and policies that guide growth in the region, including growth projections for Imperial, Los Angeles, Orange, Riverside, and Ventura counties and their associated cities, including Costa Mesa. The 2024 RTP/SCS's vision encompasses a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2024 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards. This long-range plan, required by the state of California and the federal government, is updated by SCAG every four years as demographic, economic, and policy circumstances change. The 2024 RTP/SCS is a living, evolving blueprint for the region's future. In the 2024 RTP/SCS, SCAG provides growth forecasts for population, households, and employment for year 2050.

LOCAL

Costa Mesa General Plan

The development of housing in the City is guided by the goals, objectives, and policies of the Costa Mesa General Plan Land Use and Housing Elements. The following applicable policies related to housing apply to the proposed project:

Housing Element

Housing Goal #1: Preserve and enhance the City's existing housing supply.

Housing Goal #2: Facilitate the creation and availability of housing for residents at all income levels and for those with special housing needs.

- **Policy HOU-2.1.** Facilitate the development of housing that meets the needs of all segments of the population including affordable housing and households with specialized needs.
- **Policy HOU-2.2.** Promote the use of State density bonus provisions to encourage the development of affordable housing for lower and moderate-income households, as well as senior housing through the dissemination of informational materials and discussion with the project applicants.

Housing Goal #3: Identify adequate, suitable sites for residential use and development to meet the City's Regional Housing Needs Assessment (RHNA) at all income levels and promote a range of housing types to meet the needs of all segments of the Costa Mesa community.

- **Policy HOU-3.1.** Encourage the conversion of existing marginal, underutilized, or vacant motels, commercial, and/or industrial land to residential, where feasible and consistent with environmental conditions that are suitable for new residential development.
- **Policy HOU-3.2.** Encourage the development of well-planned and designed residential or mixed-use projects which, through vertical or horizontal integration, provide for the development of compatible residential, commercial, industrial, institutional, or public uses within a single project, neighborhood, or geographic area within the City.
- **Policy HOU-3.4.** Consider the potential impact of new housing opportunities and their impacts on existing residential neighborhoods when reviewing development applicants affecting residential properties.
- **Policy HOU-3.5.** Encourage residential and mixed-use development along transportation routes and major commercial/mixed use corridors.

Housing Goal #4: Provide housing opportunities to residents of all social and economic segments of the community without discrimination on the basis of race, color, religion, sex, sexual orientation, disability/medical conditions, national origin or ancestry, marital status, age, household composition or size, source of income, or any other arbitrary factors.

- **Policy HOU-4.1.** Support equal housing opportunities as expressed in Federal and State fair housing laws.
- **Policy HOU-4.3.** Encourage and support the construction, maintenance and preservation of residential developments which will meet the needs of families and individuals with specialized housing requirements, including those with developmental disabilities.

Land Use Element

- **Policy LU-1.1.** Provide for the development of a mix and balance of housing opportunities, commercial goods and services, and employment opportunities in consideration of the needs of the business and residential segments of the community.
- **Policy LU-1.3.** Strongly encourage the development of residential uses and owner-occupied housing (single-family detached residences, condominiums, townhouses) where feasible to improve the balance between rental and ownership housing opportunities.

- **Policy LU-1.4.** Promote housing and employment opportunities within planned development areas to the extent feasible.
- **Policy LU-3.8.** Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development and surrounding residential neighborhoods.
- **Policy LU-6.1.** Encourage a mix of land uses that maintain and improve the City's long-term fiscal health.
- **Policy LU-6.2.** Continue to promote and support the vitality of commercial uses to meet the needs of local residents and that support regional-serving commercial centers.
- **Policy LU-6.11.** Provide opportunities for mixed-use, office, manufacturing, and retail development that respond to market and community needs in terms of size, location, and cost.
- **Policy LU-6.19.** Provide flexibility and support for development of residential, office, small retail centers, and similar uses that would serve local residents and would also benefit from the high visibility along major corridors outside of significant commercial or industrial nodes.
- **Policy LU-8.1.** In anticipation of the potential closure or repurposing of the Fairview Development Center site, the City will work with appropriate State agencies or private entity (if the property is sold) to plan for a complementary mix of low-scale residential, institutional, public facilities, open spaces, and recreational uses within a campus setting.

3.12.2 Existing Conditions

POPULATION

The population of Costa Mesa and Orange County (for comparison purposes) from the 2013 and 2023 US Census estimates are shown in Table 3.12-1, *City of Costa Mesa and Orange County Population (2013 and 2023)*. The City experienced an overall population decrease between 2019and 2023. Although the County has experienced an overall population increase, in 2022 and 2023 the County experienced a decrease in population.

Table 3.12-1 City of Costa Mesa and Orange County Population (2013-2023)

Year	City of Costa Mesa		Orange County	
	Population	Percent Change	Population	Percent Change
2013	110,871	-	3,051,771	-
2014	111,635	0.69%	3,086,331	1.13%
2015	112,377	0.66%	3,116,069	0.96%
2016	112,439	0.06%	3,132,211	0.52%
2017	112,930	0.44%	3,155,816	0.75%
2018	113,198	0.24%	3,164,182	0.27%
2019	113,159	(0.03%)	3,168,044	0.12%
2020	112,958	(0.18%)	3,170,345	0.07%
2021	112,148	(0.72%)	3,182,923	0.40%
2022	111,490	(0.59%)	3,175,227	(0.24%)
2023	110,523	(0.87%)	3,164,063	(0.35%)

Sources: Census 2023a, 2023b

Note: The parentheses () represent a decrease in population or percentage change

Population Forecast

SCAG generates regional growth forecasts for counties and their cities. SCAG's Demographics and Growth Forecast report shows Costa Mesa and Orange County population forecasts. The forecast for 2050 is shown in Table 3.12-2, *Population Forecast,* City of Costa Mesa and Orange County. SCAG's projections show the County is expected to grow .

Table 3.12-2 Population Forecast, City of Costa Mesa and Orange County

Year	City of Costa Mesa		Orange County	
	Population	Percent Change	Population	Percent Change
Existing 2023	110,523	-	3,164,063	-
SCAG 2030 Forecast	-	-	3,247,000	2.62%
SCAG 2035 Forecast	124,300	12.47%	3,299,000	1.60%
SCAG 2040 Forecast	-	-	3,356,000	1.73%
SCAG 2045 Forecast	-	-	3,401,000	1.34%
SCAG 2050 Forecast	134,300	8.05%	3,439,000	1.12%

Sources: Existing 2023 = Census 2023b; SCAG Forecasts = SCAG 2024.

HOUSING

Housing units in the City and County have increased over time based on information gathered from the Unites States Census as detailed in Table 3.12-3, *Housing Units, City of Costa Mesa and Orange County*, from 2013 to 2023.

Table 3.12-3 Housing Units, City of Costa Mesa and Orange County (2013-2023)

	City of Costa Mesa		Orange County	
Year	Housing Units	Percent Change	Housing Units	Percent Change
2013	40,588	-	995,512	-
2014	40,505	(0.20%)	1,002,285	0.68%
2015	40,908	0.99%	1,009,353	0.71%
2016	40,855	(0.13%)	1,017,012	0.76%
2017	40,557	(0.73%)	1,024,976	0.78%
2018	41,019	1.14%	1,032,373	0.72%
2019	40,986	(0.08%)	1,037,492	0.50%
2020	40,660	(0.80%)	1,040,001	0.24%
2021	41,243	1.43%	1,057,592	1.69%
2022	41,407	0.40%	1,066,286	0.82%
2023	41,628	0.53%	1,074,654	0.78%

Sources: Census 2023c, 2023d

Note: The parentheses () represent a decrease in housing units or percentage change

REGIONAL HOUSING NEEDS ASSESSMENT

The RHNA is mandated by State housing law as part of the systematic process of updating housing elements of local general plans. State law requires that housing elements identify RHNA targets set by HCD to encourage each jurisdiction in the state to provide its fair share of very-low-, low-, moderate-, and above-moderate-income housing for an 8-year planning period. The RHNA does not promote growth but provides a long-term outline for housing in the context of local and regional trends and housing production goals.

SCAG determines the total housing need for each community in Southern California based on three main factors: 1) the number of housing units needed to accommodate future population and employment growth; 2) the number of additional units needed to allow for housing vacancies; and 3) the number of very-low-, low-, moderate-, and above-moderate-income housing units needed in the community. Additional factors used to determine the RHNA include tenure, the average rate of units needed to replace housing units demolished, and other factors.

The City must ensure that sufficient sites planned and zoned for housing are available to accommodate its need and implement proactive programs that facilitate and encourage the production of housing commensurate with its housing needs. The City of Costa Mesa's RHNA allocation for the 2021 to 2029 period is shown in Table 3.12-4, *City of Costa Mesa RHNA Allocation (2021–2029)*. The City must ensure that sufficient sites planned and zoned for housing are available to accommodate its need and implement proactive programs that facilitate and encourage the production of housing commensurate with its housing needs.

Table 3.12-4 City of Costa Mesa RHNA Allocation (2021–2029)

Income Category	RHNA Allocation (2021-2029)	
	Number of Units	Percent
Very Low Income (0 to 50% of MFI)	2,919	31%
Low Income (51% to 80% of MFI)	1,794	15%
Moderate Income (81% to 120% of MFI)	2,088	13%
Above Moderate Income (more than 120% of MFI)	4,959	41%
Total	**11,760**	**100%**

Source: Costa Mesa 2023.

Note: MFI = Median Family Income.

Housing Forecast

Based on the 2025 Department of Finance data, SCAG forecasts show that the number of dwelling units for the City and County would increase between 2023 and 2050, as shown in Table 3.12-5, *Dwelling Unit Forecast, City of Costa Mesa and Orange County, 2023–2050*. Dwelling unit forecasts for Orange County are provided as a comparison.

Table 3.12-5 Dwelling Unit Forecast, City of Costa Mesa and Orange County, 2023–2050

	Existing 2023	SCAG 2050 Forecast1,2	Change	Percent Change
City of Costa Mesa	41,628	56,902	14,186	34.08%
Orange County	1,074,654	1,289,337	214,683	19.98%

Sources: Existing 2023 = US Census 2023c, 2023d; SCAG 2050 Forecast = SCAG 2024.

1. SCAG projects 54,400 households in Costa Mesa by 2050, which only includes occupied housing units. The City's vacancy rate (4.6 percent) from the 2023 U.S Census was applied to households to estimate housing units in Costa Mesa in 2050.

2. SCAG projects 1,253,000 households in Orange County by 2050, which only includes occupied housing units. The county's vacancy rate (2.9 percent from the 2023 U.S Census was applied to households to estimate housing units in Orange County in 2050.

EMPLOYMENT

The City of Costa Mesa and Orange County employment among local residents and annual employment change percentages are shown in Table 3.12-6, *City of Costa Mesa and Orange County Employment Trends*. The number of employed residents in Costa Mesa and the County increased from 2013 through 2023, except in 2020.

Table 3.12-6 City of Costa Mesa and Orange County Employment (2013-2023)

Year	City of Costa Mesa		Orange County	
	Employed Residents	Percent Change	Employed Residents	Percent Change
2013	60,100		1,457,000	
2014	60,700	1.00%	1,480,000	1.58%
2015	61,900	1.98%	1,513,900	2.29%
2016	63,500	2.58%	1,547,900	2.25%
2017	63,900	0.63%	1,565,400	1.13%
2018	64,500	0.94%	1,581,400	1.02%
2019	64,600	0.16%	1,583,100	0.11%
2020	58,400	(9.60%)	1,436,000	(9.29%)
2021	59,900	2.57%	1,476,000	2.79%
2022	62,100	3.67%	1,542,300	4.49%
2023	62,300	0.32%	1,555,700	0.87%

Source: California Employment Development Department (EDD) 2025

Note: The parentheses () represent a decrease in employment or percentage change

Employment Projections

SCAG employment projections for Costa Mesa and Orange County are shown in Table 3.12-7, *Employment Projections, City of Costa Mesa and Orange County, 2023–2050*.

Table 3.12-7 Employment Projections, City of Costa Mesa and Orange County, 2023–2050

	Existing 2023	SCAG 2050 Forecast	Change	Percent Change
City of Costa Mesa	62,300	104,900	42,600	68.38%
Orange County	1,555,700	2,019,000	463,300	29.78%

Sources: Existing 2023 = EDD 2025; SCAG 2050 Forecast = SCAG 2024.

3.12.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to population and housing if it would:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.12.4 Project Impact Analysis

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

CONSTRUCTION

Construction of the proposed project would require contractors and laborers. The City expects that general construction labor would be available from the local and regional labor pool and would not result in substantial population growth because the construction workers would commute from their current homes. The maximum development allowed pursuant to the proposed specific plan would occur over a period of 18 years, with full buildout of the proposed project in year 2045. Different construction workers would be needed for different phases of construction, and general construction labor would be available from the local and regional labor pool. Therefore, the proposed project would not result in a long-term increase in employment from short-term construction activities. Construction of additional housing for construction workers would not be necessary, and no additional infrastructure construction would be provided. Therefore, the proposed project would not directly or indirectly induce substantial population growth in the project area during construction. Impacts would be less than significant.

OPERATION

Direct Population Growth

The proposed project would result in the development of up to 4,000 new residential units, which would generate approximately 9,926 new residents. This calculation is based on the latest Census data,[1] and assumes 2.6 residents per dwelling unit for residential housing and one person per household for the permanent supportive housing (DDS Housing, see Chapter 2, *Project Description*).

The City's 2021-2029 Housing Element incorporates the RHNA target, identifying the need for 11,760 additional housing units in the City during this period and has included a buffer within the Housing Element Sites Inventory for an overall site capacity of up to 17,042 housing units. The City and the proposed project, would contribute to the County's forecasted population growth through the 2021-2029 RHNA allocation, as shown in Table 3.12-8, *Proposed Project's Population and Housing Contribution*, the proposed project would account for 3.61 percent of future population growth in the County 41.75 percent in population growth for the City.

The proposed project's projected population growth is well within the projected growth for the City and County. In addition, the proposed project is identified in the City's 2021-2029 Housing Element as a candidate housing site (Unique Identification Number 38) to meet the City's RHNA allocation and is an expected population growth area (Costa Mesa 2023). Therefore, the population generated by the proposed project would not result in unplanned population growth in the project area, and impacts would be less than significant.

[1] The latest 5-year American Community Survey (ACS) data, currently being from 2023.

Table 3.12-8 Proposed Project's Population and Housing Contribution

	Existing (2023)	Future (2050)	Proposed Project	Proposed Project's percentage of future forecast	Existing + Proposed Project	Remaining Future (2050) Capacity
City of Costa Mesa						
Population	110,523	134,300	9,926	41.75%	120,449	13,851
Dwelling units	41,628	56,902	4,000	26.19%	45,628	11,274
Orange County						
Population	3,164,063	3,439,000	9,926	3.61%	3,173,989	265,011
Dwelling units	1,074,654	1,289,337	4,000	1.86%	1,078,654	210,683

Sources: Existing 2023 = Census 2023a, 2023b, 2023c, 2023d; Future 2050 = SCAG 2024.
Note: The parentheses () represent a decrease in population/dwelling units or percentage change.

Housing

The proposed project would provide more housing opportunities in the City. As shown in Table 3.12-8, there are 41,628 dwelling units in the City in 2023 and the proposed project is anticipated to develop up to 4,000 dwellings units. The project's 4,000 units would increase housing in the City by 26.19 percent and in the County by 1.86 percent.

As identified in the City's 2021-2029 Housing Element, the City has a relatively low vacancy rate and 48.8 percent of renters and 31.8 percent of homeowners have a high housing cost burden[2] (Costa Mesa 2023). The proposed project would provide needed housing for various income levels. The proposed project would contribute to the City's 11,760-unit RHNA number and is cited in the City's 2021-2029 Housing Element (see Table 2-6 for the project's maximum housing units by RHNA Category).

The Housing Element identified the FDC property as a Housing Element Site that may accommodate 2,300 future residential units. Approximately 40 percent of the residential units projected for this site are intended to meet a portion of the City's RHNA for low- (345 units) and very low-income (575 units) households. The new units onsite would be consistent with the definitions of very low, low, moderate, and above moderate-income categories within Chapter 2, Section 2 of the City's 2021-2029 Housing Element. Table 2-6, *Maximum FDCSP Housing Units*

[2] Cost burdened households are estimated to spend more than 30 percent of their income on housing.

by RHNA Category, denotes the proposed project would provide a total of 575 very low, 345 low, 690 moderate, and 2,390 above moderate housing units. As further discussed below, of the 575 very low-income units at least 200 of those units shall be permanent supportive housing units in accordance with State Government Code Section 14670.31.[3] An increase of 4,000 units from the existing housing units would be within the City's planned growth. The proposed project's dwelling unit contribution is within the projected growth for Orange County (see Table 3.12-8) and City, as well as the City's RHNA allocation as identified in the 2021-2029 Housing Element.

Additionally, the proposed project is a partnership between California Department of General Services (DGS), DDS, and the City of Costa Mesa, under SB 82 and SB 188, a portion of the FDC property is to be developed in consultation with DDS while the remaining portion is to be developed by a master developer pursuant to the FDCSP. Pursuant to SB 188, the development would include and prioritize affordable housing, including at least 200 units of permanent supportive housing, and open space. Under SB 82, up to a 20-acre portion of the FDC property may be developed with affordable housing primarily targeted for people with developmental disabilities for a period not to exceed 55 years. SB 188 requires that the FDC property be utilized for a mixed-use development, including mixed-income housing. This law directs the development to include and prioritize affordable housing, including at least 200 units of permanent supportive housing, and open space. The proposed project could accommodate 96 very low-income, and 384 moderate-income DDS housing units.

The proposed project would meet all four goals identified in the City's 2021-2029 Housing Element by expanding the existing housing supply for residents of all income levels and providing special needs housing, including DDS housing units and very low-income units, through the future development of the site consistent with the RHNA. The project's inclusion of affordable housing at mixed-income levels has a beneficial community impact for Costa Mesa.

The Governor's office declared a housing crisis within the state of California with the passage of the Housing Crisis Act of 2019 (SB 330) and the office has continued to streamline and expand housing policy to address the crisis. Since the proposed project is a site identified in the City's 2021-2029 Housing Element, the proposed project's increase of 2,300 dwelling units is within the projected growth for Orange County and the City. The additional 1,700 residential units generated by the proposed project contributes to meeting a portion of the City's Regional Housing Needs Allocation (RHNA) for moderate- (690 units), low- (345 units) and very low-income (575 units) households and it is considered a beneficial community impact. Finally, the proposed project would provide housing consistent with the City and County forecasted number

[3] Housing Developed on-site by DDS may count towards meeting this requirement.

of dwelling units (as shown in Table 3.12-8), which is a beneficial community impact, no impact would occur.

Employment

The project site would include 35,000 square feet of non-residential space within the site. The proposed project would generate approximately 74 employees on-site based on 475 square feet of non-residential space per employee. As seen in Table 3.12-9, *Proposed Project's Employment Contribution*, the proposed project's employment contribution is within the projected growth for both the City and County. The proposed project would account for less than one percent of the future projected jobs in the City. Therefore, the proposed project would not result in indirect unplanned population growth in the project area by creating employment opportunities, and impacts would be less than significant.

Table 3.12-9 Proposed Project's Employment Contribution

	Existing Jobs (2023)	Future Jobs (2050)	Proposed Project Jobs	Proposed Project's percentage of future Jobs	Existing + Proposed Project Jobs	Remaining Capacity
City of Costa Mesa						
Employment	62,300	104,900	74	0.17%	62,374	42,526
Orange County						
Employment	1,555,700	2,019,000	74	0.02%	1,555,774	463,226

Sources: Existing 2023 = EDD 2025; Future 2050 = SCAG 2024.

SUMMARY

As described above, operation of the proposed project would account for a small percentage of planned population, housing, and employment growth within the City; and therefore, the proposed project would not result in unplanned growth. Further, the proposed project would accommodate very low- and low-income housing needs within the City. Overall, long-term impacts associated with population, housing, and employment growth are **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project site is approximately 95 acres within the former FDC facility and is currently developed with buildings, paved areas, natural grass areas, trees, and ornamental landscaping. The portion surrounding Fair Drive consists of the 3-lane alignment of Fair Drive between its intersection with N Shelley Circle and Harbor Boulevard. No dwelling units or residential uses currently occupy the project site. Thus, the proposed project would not displace housing or people. Therefore, **no impact** would occur.

Significance without Mitigation: No Impact.

3.12.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to population and housing?

The area is considered for cumulative impacts in the SCAG region. Impacts are analyzed using SCAG's 2040-2050 RTP/SCS Growth Forecast. The projects listed in Chapter 3, Environmental Analysis, Table 3-2, which includes the City Housing Element Rezone Project, the Southern Regional Emergency Operational Center (SREOC) project, and the DDS site. The SREOC would be constructed prior to the proposed project and not provide any additional housing and as such is not a population inducing project. The DDS site would provide additional DDS units which are specifically for persons of intellectual and developmental disabilities at one person per household for the permanent supportive housing and would not include a substantial growth in population or dwelling units. The City's Neighborhoods Where We All Belong (NWWAB) Housing Element Rezone Project would result in approximately 21,522 units (RHNA allocation, Housing element [except the Fairview Development Center site], and Measure K sites). The identified cumulative projects further enable Costa Mesa's implementation of its RHNA allocations for the City and assist in relieving the housing crisis within the State.

The development of the proposed project in conjunction with the cumulative projects listed in Table 3-2, and housing projects within the SCAG region would contribute to meet existing housing needs and the backlog of unmet housing needs form the previous decades within the region (SCAG 2014). Although the proposed project would not displace housing or people, the identified cumulative development projects listed in Table 3-2, and other housing projects in the SCAG region, would be subject to the same federal, State, and local regulations during the CEQA process and would require review of displaced housing or people. Once approved, the proposed project and other housing projects would enhance the City's and State's housing supply. The proposed project combined with related housing projects would not result in cumulatively considerable substantial unplanned population or housing growth since the development of

such housing would benefit residents by providing unmet housing needs in the region. Thus, the proposed project, combined with related developments, would not result in cumulatively considerable impacts on population and housing.

Significance without Mitigation: Less than Significant.

3.12.6 References

Costa Mesa, City of. 2023. Housing Plan. Chapter 4 of Costa Mesa Housing Element 6th Cycle 2021-2029. https://www.costamesaca.gov/home/showpublisheddocument/52834/638133568853530000.

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3.13 PUBLIC SERVICES

This section of the DEIR evaluates the potential impacts of the Fairview Developmental Center Specific Plan (proposed project) (FDCSP) to impact public services (fire protection and emergency services, police protection, school services, library services, and park facilities) in the City of Costa Mesa. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary. Park services are addressed in Section 3.16, *Recreation*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 3.19, *Utilities and Service Systems*. Section 3.17, *Transportation,* address the potential project-related impacts to emergency and evacuation plans. The analysis in this section is based in part on the following correspondence:

- *Response to service letter and questionnaire*, Newport Mesa Unified School District, February 9, 2026. (DEIR Appendix I.1).
- *Response to service letter and questionnaire*, Costa Mesa Police Department, February 13, 2026. (DEIR Appendix I.1).
- *Response to service letter and questionnaire*, Orange County Public Library, February 13, 2026. (DEIR Appendix I.1).
- Response to service letter and questionnaire, Costa Mesa Fire and Rescue, February 19, 2026. (DEIR Appendix I.1).

3.13.1 Regulatory Framework

FIRE PROTECTION AND EMERGENCY SERVICES

Federal

International Fire Code

The International Fire Code (IFC) is a model code for regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The IFC includes general and specialized technical fire- and life-safety regulations, with topics addressing fire-department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and various other topics. The IFC is issued by the International Code Council, which is an international organization of building officials.

State

California Building Code

The California Building Code (CBC), located in Part 2 of Title 24 of the California Code of Regulations, establishes the minimum state building standards. The CBC is currently updated every three years.

The most recent update is the 2025 CBC, effective starting January 1, 2026. It is based on the 2024 International Building Code (IBC) but amended to account for California conditions. The CBC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local needs. Commercial and residential buildings are plan-checked by City building officials for compliance with the CBC. Typical fire safety requirements of the CBC include installing sprinklers in all high-rise buildings; establishing fire resistance standards for fire doors, building materials, and particular types of construction; and clearing debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code

The California Fire Code (CFC) (California Code of Regulations, Title 24, Part 9) is based on the 2024 IFC and includes amendments from the State of California fully integrated into the code. The CFC contains fire safety-related building standards that are referenced in other parts of Title 24 of the California Code of Regulations. The CFC is updated once every three years; the 2025 CFC took effect on January 1, 2026.

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8, Sections 1270, “Fire Prevention,” and 6773, “Fire Protection and Fire Fighting Equipment,” the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include but are not limited to guidelines on the handling of highly combustible materials, firehouse sizing requirements; restrictions on the use of compressed air; access roads; and the testing, maintenance, and use of all firefighting and emergency medical equipment.

Local

City of Costa Mesa General Plan

The Safety and Land Use Element of the General Plan include the following policies related to fire protection and emergency services within the City:

- **Policy S-2.4.** Provide a high level of police and fire service in the community. Secure adequate facilities, equipment, and personnel for police and fire.
- **Policy S-2.5.** Consult with neighboring jurisdictions and partner agencies to respond appropriately to emergencies and incidents in all parts of the City.
- **Policy S-2.6.** Require that water supply systems for development are adequate to combat structural fires in terms of location and minimum required fire-flow pressures.
- **Policy S-2.7.** Require development to contribute its fair share toward funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.
- **Policy S-2.9.** Emphasize prevention and awareness of fire safety guidelines to minimize risk and potential damage to life, property, and the environment. In areas designated by the Costa Mesa Fire & Rescue Department as having a high fire hazard, ensure adequate fire equipment, personnel, firebreaks, facilities, water, and access for a quick and efficient response in any area.
- **Policy S-2.12.** Continue to maintain adequate police and fire staffing, facilities, equipment, and maintenance sufficient to protect the community.
- **Policy LU.5.5.** Ensure that new development pays its fair share of impact fees such as park fees and traffic impact fees. This can also include impact fees related to community services (police protection services and fire emergency response services) or library facilities, once adopted and applicable.

City of Costa Mesa Municipal Code

Municipal Code Title 5, Buildings and Construction, requires building construction activities to comply with all adopted State construction codes, including the CBC and CFC.

Title 7, Chapter II, Municipal Code Section 7-14, Adoption of the California Fire Code, adopts, with modifications, the triennially updated CFC.

Development Impact Fees

The City requires payment of fire system development fees for new development. Title 13, Chapter XII, Article 2, Municipal Code Section 13-270, Establishment of Development Impact Fee, details the City's development impact fee based on the Costa Mesa Fire Protection System Fee Study. The revenues raised by the development impact fee are used to fund fire protection facilities and equipment.

POLICE PROTECTION AND SERVICES

Local

The Safety and Land Use Element of the General Plan include the following policies related to police protection and services within the City:

- **Policy S-2.1.** Promote crime prevention strategies and provide a high level of response to incidents.
- **Policy S-2.2.** Emphasize and prioritize crime prevention strategies, such as pedestrian-scale lighting in targeted areas.
- **Policy S-2.3.** Timely response to incidents and monitoring areas with high crime rates should be part of a comprehensive strategy to reduce crime in the community.
- **Policy S-2.4.** Provide a high level of police and fire service in the community. Secure adequate facilities, equipment, and personnel for police and fire.
- **Policy S-2.5.** Consult with neighboring jurisdictions and partner agencies to respond appropriately to emergencies and incidents in all parts of the City.
- **Policy S-2.12.** Continue to maintain adequate police and fire staffing, facilities, equipment, and maintenance sufficient to protect the community.
- **Policy LU.5.5.** Ensure that new development pays its fair share of impact fees such as park fees and traffic impact fees. This can also include impact fees related to community services (police protection services and fire emergency response services) or library facilities, once adopted and applicable).

SCHOOL SERVICES

State

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

California Senate Bill 50

Senate Bill (SB) 50, passed in 1998, provides a comprehensive school facilities financing and reform program and enables a statewide bond issue to be placed on the ballot. Under the provisions of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount of fees developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation."

Under this legislation, there are three levels of developer fees that may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, and the state provides the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis and meet other prerequisites in accordance with Section 65995.6 of the California Government Code. Level III fees apply if the state runs out of bond funds, allowing the governing school district to impose 100 percent of the cost of school facility or mitigation minus any local dedicated school monies on the developer.

Local

Newport-Mesa Unified School District Developer Fees

Newport-Mesa Unified School District (NMUSD) utilizes a Level 1 fee structure to establish developer fees anticipated to offset development impacts on existing NMUSD facilities and resources. Based on the current fee structure, NMUSD charges $5.17 per square foot of residential development and $0.84 per square foot of commercial development (NMUSD 2025).

PARK SERVICES

State

California Government Code

The Government Code (Sections 65560–65568) requires a general plan to include an open space element to address: the preservation of natural resources, managed production of resources, outdoor recreation, public health and safety, support of military installations, and protection of places of cultural or historical interest. Building permits, subdivision approvals, and zoning approvals must be consistent with the open space plan. The Public Resources Code (Section 5076) also requires general plans to consider demands for trail-oriented recreational use, demands in developing open-space programs, the feasibility of integrating its trail routes with appropriate segments of the state system. Cities may also create a separate parks and recreation element as part of or in addition to an open space and conservation element.

California Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California's Public Park Preservation Act of 1971. Under the Public Resources Code, cities and counties may not acquire any real property that is in use as a public park for any nonpark use unless compensation, land, or both are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

Quimby Act

The Quimby Act (California Government Code Section 66477) authorizes cities and counties to require developers to dedicate land as parkland, pay in-lieu fees, or both as a condition of approval for a tentative or final tract map or parcel map for a residential subdivision. Revenue generated through the Quimby Act cannot be used for the operations or maintenance of existing park facilities. The Quimby Act also sets a statewide standard of three acres of parkland for every 1,000 residents unless the existing neighborhood and community park area exceeds that limit, in which case the city or county may establish a higher standard.

Mitigation Fee Act

The California Mitigation Fee Act (Government Code Sections 66000 et seq.) allows cities to impose fees on development projects to mitigate the project's impact on the city's ability to provide specified public facilities. To comply with the Mitigation Fee Act, a city must follow four primary requirements: 1) Make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee; 2) Segregate fee revenue from the general fund to avoid commingling capital facilities fees and general funds; 3) Make findings each fiscal year describing the continuing need for fees that have been in the possession of the city for five years or more and that have not been spent or committed to a project; and 4) Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

Local

City of Costa Mesa General Plan

The Open Space and Recreation Element of the General Plan include the following policies related to park facilities and recreation services within the city:

- **Policy OSR-1.1.** Maintain a system of Neighborhood and Community Parks that provide a variety of active and passive recreational opportunities throughout the City.
- **Policy OSR-1.2.** Provide parks and recreation facilities appropriate for the individual neighborhoods in which they are located and reflective of the needs and interests of the population they serve.
- **Policy OSR-1.3.** Pursue the acquisition and development of pocket and neighborhood parks within park-deficient areas, as identified in Figure OSR-3: Planning Areas and Underserved Park Areas.
- **Policy OSR-1.4.** Prioritize the acquisition of land for parks in underserved neighborhoods.
- **Policy OSR-1.5.** Maximize public space by requiring plazas and public gathering spaces in private developments that can serve multiple uses, including recreation and social needs.
- **Policy OSR-1.6.** Provide maximum visibility and accessibility for future public parks by locating facilities in close proximity to public streets.
- **Policy OSR-1.8**. Require that parks and recreation facilities reflect new trends and population changes, and are developed with facilities appropriate to all ages, including athletic fields, active play areas, passive open space, tot lots, and picnic areas.

- **Policy OSR-1.13**. Design and reform parks to reflect the latest recreational features that respond to demographic changes and community needs.
- **Policy OSR-1.18**. Provide a minimum of 4.26 acres of parkland per 1,000 residents.
- **Policy OSR-1.20.** Enhance pedestrian, bicycle, and transit linkages to meet the needs of residents and to provide better access to parks, recreation, and public spaces.
- **Policy OSR-1.21.** Provide opportunities for public access to all open space areas, except where sensitive resources may be threatened or damaged, public health and safety may be compromised, or access would interfere with the managed production of resources.

City of Costa Mesa Municipal Code

Municipal Code Title 13, Chapter XII, Article 4, Park and Recreation Impact Fees, requires the dedication of land and/or payment of in-lieu fees by residential development projects meeting certain criteria in the amount of 4.26 acres per 1,000 residents added by such residential projects. The City's parkland standard is 4.26 acres per 1,000 residents.

City of Costa Mesa Parks, Recreation, and Open Space Master Plan

The Costa Mesa Parks, Recreation, and Open Space Master Plan Update serves as a guide and implementation tool for the management and development of parks and recreational facilities and programs for the City of Costa Mesa. The Costa Mesa Parks, Recreation, and Open Space Master Plan identifies top priority facilities that include: walking/jogging/running/hiking trails, soccer fields, lights (sports field), open space, multi-use fields with lights, swimming pool, picnic tables, skate park, bike paths, pocket/neighborhood parks, and restrooms.

In the Master Plan Update, numerous sites were evaluated for their potential to provide recreational opportunities in the community to meet facility and demand needs. The Fairview Development Center (project site) was identified as a park opportunity site (Costa Mesa 2018).

LIBRARY SERVICES

Local

The Land use Element of the General Plan includes the following policies related to police protection and services within the City:

- **Policy LU.5.5.** Ensure that new development pays its fair share of impact fees such as park fees and traffic impact fees. This can also include impact fees related to community services (police protection services and fire emergency response services) or library facilities, once adopted and applicable.

3.13.2 Existing Conditions

FIRE PROTECTION AND EMERGENCY SERVICES

The Costa Mesa Fire & Rescue Department (CMFR) provides fire/rescue/emergency medical services, and fire prevention/community risk reduction services to the city and project site. CMFR has six fire stations in the city that are staffed 24 hours a day, every day, with 90 full-time staff members (84 sworn positions) (Costa Mesa 2026a). The closest station that responds to calls at the project site is Fire Station 4 at 2300 Placentia Avenue, approximately 0.25 miles south or approximately 2 miles via the roadway. The next closest station that responds to calls at the project site is Fire Station 1 at 1570 Adams Avenue, approximately 0.30 miles east of the site or approximately 1.4 miles via the roadway.

Automatic/Mutual Aid

The CMFR is a participant of Metro Net Cities (Fountain Valley, Huntington Beach, Newport Beach, Santa Ana) and the Orange County Fire Authority, an automatic/mutual aid system and training collaborative with surrounding cities. The closest emergency response unit is dispatched to the emergency, regardless of city boundary (Costa Mesa 2026b).

Calls for Service and Response Times

In 2023, CMFR responded to a total of 13,845 calls (Costa mesa 2023). For pre-hospital medical emergencies and incipient/small fires, the City's target total response time is measured from receipt of the 9-1-1 call at the communications center:

Target total response time (call receipt to on-scene): 8 minutes 30 seconds (90th fractile)

Breakdown (components of the target total response time):

- Call-processing/dispatch time (call receipt to dispatch): 1 minute 30 seconds
- Turnout time (dispatch-to-enroute): 2 minutes
- Travel time (enroute-to-on-scene): 5 minutes

Response times vary by time of day, traffic conditions, unit availability, and incident type (Appendix I.1).

POLICE SERVICES

The Costa Mesa Police Department (CMPD) provides police protection services to the City, including the project site. The City has a main police department headquarters and no ancillary facilities; headquarters are at 99 Fair Drive, approximately 0.85 mile east of the project site or approximately 1.5 miles via the roadway. CMPD contains three separate divisions—

administrative, field operations, and support services. The City is divided into two patrol areas; the project site is in Patrol Area 2 (Beat 1) (Costa Mesa 2026c). The CMPD are currently budgeted for 142 sworn police personnel and 102 full-time professional support staff, but are only staffed at 137 sworn and 89 professional staff (Appendix I.1).

CMPD identified the department has 1.26 officers per 1,000 residents and desires to increase staffing within the patrol force and real-time information center. Based upon a recent third-party citywide facilities assessment, the Police Department HQ is currently above capacity for staff, desired programs, parking and inhibits the efficient delivery of services. Currently the City is discussing demolishing and rebuilding a new Westside Substation to move some personnel and services to the south end of City; however, no funding or designs are currently available.

The CMPD meets their performance targets 99 percent of the time for answering 911 calls within 10 seconds, 97 percent for dispatching emergency calls within 5 minutes, and 88 percent for responding to non-emergency calls within 30 minutes in 2025. In addition, CMPD has the customer service goal of "response time – 5 minutes or less – emergency calls displaced" which is met 94 percent of the time based on 2025 data. CMPD states although the department is approaching full staffing, the records, jail, and communications bureaus are significantly understaffed, and the current main department is too small for staffing.

Mutual Aid

The Costa Mesa Police Department has mutual aid agreements under the State of California Mutual Aid Plan and participates in local mutual aid arrangements through the Orange County Chiefs of Police and Sheriff's Association.

SCHOOLS

The Newport-Mesa Unified School District (NMUSD) provides educational services for the cities of Costa Mesa and Newport Beach. NMUSD consists of 37 schools—24 elementary schools, 2 intermediate schools, 4 high schools, 6 alternative educational or specialty campuses, and an adult education program (partnered with the Huntington Beach Adult School) (NMUSD 2026). Districtwide enrollment in the 2023-2024 school year was 17,635 students (CDE 2026). The district has an existing facilities capacity of 27,818 students (NMUSD 2025). As identified in NMUSD's response to PlaceWorks' request for information, there are no current plans to expand school facilities within the district (Appendix I.1).

The schools near the proposed project that could serve future residence are Adams Elementary School at 2850 Clubhouse Road, TeWinkle Middle School 3224 California Avenue, and Estancia High School at 2323 Placentia Avenue.

PARKS

The project site is currently developed with the Fairview Developmental Center and associated facilities, and no parkland currently exists on-site. The former recreational facilities at the FDC, as part of the Goodell Education Center, have remained vacant and are not open or allowable for public use. Therefore, they are not considered existing parkland, recreational facilities, or open space. However, the proposed project includes off-site improvements at the Costa Mesa County Club. The Costa Mesa Country Club is 237.2 acres with two 18-hole golf courses, a pro shop, coffee shop, banquet facility, and driving range (Costa Mesa 2026d). Additional information regarding parks and recreational facilities is in Section 3.14, *Recreation*.

LIBRARY SERVICES

The Orange County Public Library (OCPL) provides library services to the City, including the project site. OCPL operates 29 branch libraries and a satellite location, with a systemwide collection of approximately 1.7 million materials, online resources, and streaming services (OCPL 2026). The City has two branch libraries operated by OCPL: the Donald Dungan Library at 1855 Park Avenue, and the Mesa Verde Library at 2969 Mesa Verde Drive. Donald Dungan Library and Mesa Verde Library are located approximately 1.28 miles south and 0.78 miles north of the project site, respectively.

The Donald Dungan Library has a collection of 67,312 items with a staff of 13. The Mesa Verde Library has a collection of 42,571 items with a staff of 10. Additional resources provided by OCPL include: Blood pressure monitor kits, games/puzzles, Stargazing Kit, hotspots, tools, CD/cassette players, musical instruments (guitars, drum machines, keyboards, bongos), kitchen tools (blenders, food dehydrator), outdoor/beach games, weekly storytimes, tech help for devices, art classes, bingo, crochet classes, monthly book clubs, and author events. OCPL stated the existing collections at the Donald Dungan Library, and Mesa Verde Library are adequate for the current population.

Currently a remodel of the Mesa Verde Library branch is recommended to address Americans with Disabilities Act (ADA) compliance and modernizations. There are no plans for expansion of the Mesa Verde Library branch; however, the remodel will require new furniture, fixtures, and equipment (Appendix I.1)

3.13.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities (Library Services)

METHODOLOGY

Fire Protection and Emergency Services

To assess the potential impacts of the proposed project on fire services, existing conditions were evaluated using publicly available records, and the service letter and questionnaire letter received on February 19, 2026. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. A site plan review by the Costa Mesa Fire & Rescue are assumed to occur as general services provided. In determining the level of significance, the analysis assumes the proposed project would comply with relevant federal, state, and local laws, ordinances, and regulations.

Police Protection and Services

To assess the potential impacts of the proposed project on police protection and services, existing conditions were evaluated using the service letter and questionnaire letter received on February 13, 2026. Information obtained from the response to service letter and questionnaire was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. The service letter and questionnaire provided guidance on service needs and staffing necessary to continue to provide police services at existing levels of service. In determining the level of significance, the analysis assumes the proposed project would comply with relevant federal, State, and local laws, ordinances, and regulations.

School Services

To assess the potential impacts of the proposed project on school services, existing conditions were evaluated using online-publicly accessible information, and the service letter and questionnaire letter received on February 9, 2026. Information obtained from online-publicly

accessible information, and the response to service letter and questionnaire was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. The service letter and questionnaire provided guidance on potential impacts during construction with new Safe Routes to School planned. Operational impacts for NMUSD were determined using the NMUSD 2025 Fee Justification Study. In determining the level of significance, the Districts' available capacity was compared against the projected number of students generated by the proposed project and assumes the proposed project would comply with relevant federal, State, and local laws, ordinances, and regulations.

Park Services

To assess the potential impacts of the proposed project on recreational resources, existing conditions were evaluated using publicly available records, including the City of Costa Mesa Parks and Recreation Department, the Costa Mesa Municipal Code, and the City's General Plan. Baseline recreational facilities were identified, and parkland supply and demand were analyzed relative to the City's standard of 4.26 acres per 1,000 residents. Projected population from the proposed project (Section 5.12, *Population and Housing*) was used to estimate future recreational demand. Parkland needs and potential deficiencies were determined by comparing projected population-generated demand to existing facilities, consistent with CEQA Guidelines and the City's established parkland standards. The FDCSP's Development and Design Regulations assisted in determining how the project would reach the City's Standard (See Section 3.14, *Recreation*).

Library Services

To assess the potential impacts of the proposed project on library services, existing conditions were evaluated using online-publicly accessible information, and the service letter and questionnaire letter received on February 13, 2026. Information obtained from online-publicly accessible information, and the response to service letter and questionnaire was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes the proposed project would comply with relevant federal, State, and local laws, ordinances, and regulations.

3.13.4 Project Impact Analysis

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

FIRE PROTECTION AND EMERGENCY SERVICES

Development of the proposed project includes up to 4,000 residential units, 35,000 square feet of commercial space, and a minimum of 14 acres of open space. As discussed in Section 3.12, *Housing and Population*, of this DEIR, the project is anticipated to introduce up to 9,926 residents and 74 employees. The proposed project would increase the demand for fire protection and emergency services compared to existing conditions.

The project site is located within a highly urbanized area that is currently served by established emergency response infrastructure, including CMFR fire stations. The proposed project would not alter fire station locations, service boundaries, or deployment protocols. Fire Station 4 (2300 Placentia Avenue) would provide the initial response to the plan area, and Fire Station 1 (1570 Adams Avenue) can provide support if needed. However, CMFR identified the increase in development, employment, visitors, and residents on the Project Site would result in an increase in emergency medical services demand, total incident volume, and call volume with buildout of the proposed project (Appendix I.1). If growth occurs without commensurate resources, the project is likely to contribute to decreased performance during peak demand, the primary operational risk is coverage reliability during simultaneous incidents and peak EMS demand leading to unit unavailability. With the increase in demand, CMFR states the maximum buildout of the proposed project may contribute to a need for additional staff and/or operational resources to maintain service objectives. In addition, CMFR states the project would contribute to the need for additional fire protection resources such as a new facility or expanded existing facilities.

As discussed in Chapter 7, Infrastructure & Public Servies, of the FDCSP, the project phasing shall incorporate any identified fire protection improvements, including a fire station if needed. Up to two acres would be dedicated to the development of a fire station as a permitted land use under the FDCSP. However, the final design and location will be determined based on City needs/demand for fire services and future site plans. As outlined in Section 3.12, *Housing and Population*, of this DEIR, the project site is in an area anticipated to experience continued population and employment growth under adopted regional and local planning projections. Fire protection services, plan and operate based on these long-term growth forecasts rather than individual projects alone. As such, growth associated with the proposed project would occur

within the context of the anticipated development trends, as discussed in Section 3.12, *Housing and Population*, and service demand increases would be incremental relative to the broader planned growth in the City.

CMFR would review plans for new development at the time the applications for new development are submitted to ensure that CMFR could continue to maintain adequate fire and emergency service response within the plan area without affecting CMFR's existing response times. In addition, the proposed project would be required to provide adequate water supply and all streets within the FDCSP would be designed to provide adequate turnaround space for fire apparatus. See Section 3.15, for discussion on emergency access and the roadway networks functionality.

Additionally, development in accordance with the proposed project would be required to contribute their fair share toward fire and emergency medical services in the City through payment of Fire System Development Fees (Municipal Code Section 13-270) to offset the increased demand for fire and emergency medical services generated by the proposed project's increased population and density.

Although the proposed project would increase demand for fire protection and emergency medical services, payment of developmental impact fees, site plan and circulation review by the Fire Department, and compliance with local and state policies would ensure this impact is **less than significant**.

Significance without Mitigation: Less than significant.

POLICE PROTECTION AND SERVICES

Development of the proposed project includes up to 4,000 residential units, 35,000 square feet of commercial space, and open space within the plan area. As discussed in Section 3.12, *Housing and Population*, of this DEIR, the project is anticipated to introduce up to 9,926 residents and 74 employees. CMPD identified that the proposed project would require 12 additional officers and 7 additional professional staff to meet CMPD's standards (Appendix I.1). Yet based on the projected population within Section 3.12, *Housing and Population,* of this DEIR, maximum buildout of the proposed project would require 13 additional officers and 7 additional professional staff to meet CMPD's standards.[1] However, the proposed project would not require new or expanded police facilities (Appendix I.1). Even so Chapter 7, Infrastructure & Public Servies, of the DEIR, permits a police sub-station as a permitted use under the FDCSP, if needed. If a police sub-station is determined necessary within the project site, the substation would be housed within the 2-acre fire department station. Increases in demand to CMPD are

[1] 9,926 residence x 1.26 officer per 1000 residence = 12.50 officers
9,926 residence x 1.26 officer per 1000 residence = 7.14 officers

addressed through the City's General Fund, whose revenues are collected from property, sales, and utility taxes. The proposed projects' contribution to the City's General Fund through taxes would help ensure that future projects within the plan area are reviewed individually by the City of Costa Mesa and are required to comply with the regulations in effect at the time building permits are issued.

The operation of the proposed project would include several design features and security measures that would reduce the opportunity for criminal activity on-site. For example, security lighting, fencing, and defensive landscaping would be installed throughout the project site. The proposed project would be designed with emergency access in accordance with federal, State and local regulations.

Although the proposed project would increase demand for police services, the project's contribution of taxes to the City's General Fund, site design, and compliance with other local and state policies would ensure this impact is **less than significant**.

Significance without Mitigation: Less than significant.

SCHOOLS

Demand for schools is largely generated by new housing development. The proposed project includes up to 4,000 residential units. As shown in Table 3.13-1, *Projected Capacity at NMUSD With the Proposed Project*, the project is estimated to generate 378 elementary school students and 384 middle and high school students.

Table 3.13-1 Projected Capacity at NMUSD With the Proposed Project

School Level	Student Generation Number	Maximum Proposed Units	Students Generated[1]	Available Capacity[2]	Available Capacity + Project
Elementary School (TK-6)	0.0944	4,000	378	6,422	6,044
Middle and High School (7-12)	0.0961		384	4,314	3,930

Source: NMUSD 2025.

1. The number of students generated was rounded up to the next whole number.
2. Based on student enrollment data as of October 2024.

The number of students generated is well within NMUSD's available capacity. Thus, no new educational facilities would be needed to accommodate the number of students generated by the proposed project. According to the District, demand for school services is managed through enrollment controls, long-range facility planning, and ongoing coordination with local

jurisdictions. In addition, early coordination with the District regarding buildout, phasing, and anticipated student generation rates of development projects can assist in planning and managing school service demand (Appendix I.1).

The proposed project would be subject to NMUSD's Developer Fees, levied under SB 50, which are used to offset development impacts on existing NMUSD facilities and resources (NMUSD 2025). This funding program has been found by the Legislature to constitute "full and complete mitigation of the impacts" on the provision of adequate school facilities (Government Code Section 65995[h]). The increased demand for school facilities would have the potential to increase the demand for school services within the NMUSD, although well within NMUSD's available capacity, payment of impact fees in compliance with SB 50 would reduce the impacts to an acceptable level.

Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

PARKS

During the construction phase of the proposed project, up to six holes on the adjacent Costa Mesa Country Club's 18-hole Mesa Linda golf course would require temporary closure. To maintain course operations, the project would also necessitate reconfiguration of up to six holes. The proposed project requires construction of a secondary access road through the golf course which may result in a slight decrease in the amount of playable golf course area; however, the total number of holes are anticipated to remain unchanged, with a goal to maintain par and yardage to the greatest extent feasible. Furthermore, the FDCSP will require that future development meet open space requirements, as discussed below.

Development of 4,000 dwelling units is expected to increase population by approximately 9,926 people, thereby increasing the demand for parks in the City. The proposed project includes a minimum of 14 acres of public open spaces. Private and common open space on the project site would assist in offsetting the need for public open space. The City's parkland standard is 4.26 acres per 1,000 residents for new development. Therefore, the proposed increase in residents would require the addition of 42.28[2] acres of parkland.

As discussed in 3.14, *Recreation*, the proposed project includes a minimum of 14-acres of public open spaces (see Figure 4-1, *Conceptual Land Use Plan*). This public open space is in addition to the private and common open space that the FDCSP requires for new residential development.[3]

[2] (4.26 acres x 9,926 proposed residents) ÷ 1,000 residents = 42.28

[3] Public Open Space includes public parks, trails, plazas, and other types of open spaces available to the general public. It does not include private and common open space that is considered an on-site amenity for multifamily

FDCSP Chapter 6, Open Space, Landscaping & Public Art, requires that new development achieve the 4.26 acres of parkland per 1,000 residents. This standard can be met through land dedication, park improvements,[4] and in-lieu fees; however, no less than 14 acres of publicly accessible open space shall be provided for the FDC site.

With implementation of the Open Space, Landscaping & Public Art requirements of the FDCSP, the proposed project would meet the General Plan Policy OSR-1.18 standard of 4.26 acres per 1,000 residents. The combination of on-site public open space, private and common open space (amenities) and the payment of the Park and Recreation Impact Fees —as well as property and sales tax revenue—would also contribute to improvements and maintenance of existing recreation facilities, which would ensure that the proposed project would not impact park facilities or park services.

Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

LIBRARY SERVICES

Development of 4,000 dwelling units in the plan area is expected to increase population in Costa Mesa by approximately 9,926 people. As identified by OCPL, the proposed project would result in an increased demand for library services, including the need for additional library collections and personnel (Appendix I.1).

OCPL partners with the City to ensure adequate funding for library services. Library facilities and services are funded through the City General Fund (i.e., property tax revenue), payment of development impact fees, and federal E-rate funding for technology upgrades. Property taxes are the primary source of funding for OCPL (OCPL 2024). Therefore, Library service impacts of the proposed project would largely be offset by funding generated by tax revenue. In addition, future projects within the plan area would also be reviewed by the City of Costa Mesa on an individual basis and would be required to comply with requirements in effect at the time building permits are issued (i.e., payment of development impact fees in accordance with General Plan Policy LU 5.5). Payment of property taxes and development impact fees would ensure OCPL is able to maintain existing library services, and standards for its space and collections.

housing and is primarily accessible by the residents of the housing development, unless the common open space is publicly accessible.

[4] Publicly accessible open spaces can also count toward this requirement, as approved by the Community Services Department.

Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.13.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to public services?

The cumulative projects in Table 3-2 of Chapter 3, *Environmental Analysis*, would contribute to an increase in fire, police, school, and library services.

Fire

The area of cumulative effect for fire protection is the City of Costa Mesa. As discussed above, CMFR states the project would contribute to the need for additional fire protection personnel and resources, such as a new facility or expanded existing facilities. The project itself would not need a new or expanded facility, but would contribute to needing a new or expanded facility. In addition, cumulative development projects that involve residential development would increase the population in the region and will require the construction or expansion of fire facilities so that adequate service ratios are maintained. This increase in population would require the construction or expansion of fire facilities, which could result in adverse environmental impacts. Environmental impacts could result from a new or expansion of a CMFR facility; but the size, and location of such improvements is unknown, and would have to complete applicable environmental review under CEQA once a project is determined to be needed (Appendix I.1). However, the FDCSP allows the development of fire protection improvements and a fire station, if needed, on the project site. Additionally, payment of Fire System Development Fees (Municipal Code Section 13-270) of cumulative projects would ensure CMFR is able to maintain fire protection and emergency services, and service demands and response times. Like the proposed project, cumulative development projects would be reviewed by the CMFR and would be subject to design requirements, and conditions of approval (if applicable) CMFR could impose on a project. Impacts would be less than cumulatively considerable.

Police

The area of cumulative effect for police services is the City of Costa Mesa. As indicated by CMPD, full buildout of the proposed project and continued population growth would require additional personnel and facilities. Cumulative development projects would increase the population and employment in the region, require additional personnel and the construction or expansion of police facilities so that adequate service ratios are maintained. The City and CMPD are currently discussing the need for a new Westside Substation to meet existing service needs and is expected to be five years away. The construction or expansion of police facilities, could result in adverse environmental impacts. Such a facility would have to complete applicable

environmental review under CEQA, and location and size of the potential future facility, is not known at this time (Appendix I.1). However, if needed, the FDCSP allows the development of a police sub-station within the project site and can be within the up to 2-acre fire department station. Like the proposed project, cumulative development projects would include site design concepts to reduce the potential of unwanted activity on their respective sites and comply with applicable regulatory requirements related to security and safety. Additionally, cumulative development projects contributions of taxes to the City's General Fund would ensure CMPD is able to maintain existing police services, officer/staff levels, and performance standards for 911 calls. Impacts would be less than cumulatively considerable.

Schools

The area considered for cumulative analysis is the service area of the NMUSD. Cumulative development projects that involve residential development would increase the public-school population in the region and require the construction or expansion of school facilities so that adequate service ratios are maintained. This increase in student population would require the construction or expansion of school facilities, which could result in adverse environmental impacts. As discussed above, under state law, development projects are required to pay established school impact fees in accordance with SB 50 at the time of building permit issuance. The funding program established by SB 50 has been found by the Legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school facilities" (Government Code Section 65995[h]). The fees authorized for collection under SB 50 are conclusively deemed full and adequate mitigation of impacts on school district facilities. Furthermore, cumulative school projects require discretionary actions and would be required to demonstrate compliance with CEQA prior to project approval. The proposed project would not combine with areawide growth to result in cumulatively considerable impacts to school services. Impacts would be less than cumulatively considerable.

Parks

Growth within the City would increase demand for parks and recreational facilities. The identified cumulative development listed in Chapter 3, *Environmental Analysis*, Table 3-2, and other projects within the City would contribute to an increase in parks and recreational facilities. The cumulative population and the proposed project would be subject to the same federal, State, and local regulations. Cumulative projects would develop their own parkland or open space on-site and, if deemed necessary, pay Park and Recreation Impact Fees. In addition, the identified cumulative projects would also pay property, sales, and utility taxes and fees supporting the City's General Fund, part of which would be available for the operation and development of new parks and recreational facilities.

Based on the 2023 American Community Survey, the City of Costa Mesa's population is 110,523 persons and is served by approximately 381.67 acres of park space, resulting in 3.45 acres of parkland per 1,000 residents. To achieve the General Plan Policy OSR-1.18, the City would need

to provide 471 acres of parkland within the City, which is approximately 89 acres of additional parkland citywide. Therefore, the City is currently considered parkland deficient, and various areas throughout the City are considered underserved by parkland (Costa Mesa 2018). While the City is considered park deficient based on the City's General Plan policy, residents in Costa Mesa have access to regional parks that are not counted towards the City's park standard, including Talbert Regional Park (180 acres), the Santa Ana River Trail, and Mile Square Regional Park (607-acres). In addition, many residents of Costa Mesa are in close proximity to Huntington State Beach, Newport Beach, and other beaches in the vicinity. Nearby regional parks and beaches help offset local parkland demands.

Moreover, the FDCSP would not cumulatively contribute to the City's parkland deficit because the FDCSP would require development within the plan area to achieve the City's higher standard of 4.26 acres per 1,000 people, as discussed above in Section 3.13.4, and thus meet General Plan Policy OSR-1.18. Therefore, cumulative impacts of the proposed project would be less than significant through land dedication, park improvements, and in lieu fees. Impacts of the proposed project would not be cumulatively considerable.

Library

The area considered for cumulative analysis is the service area of the Costa Mesa library system. OCPL identified that Mesa Verda Library is recommended for ADA and modernization improvements (Appendix I.1). Cumulative development projects that involve residential development would increase the population in the region and require the construction or expansion of library facilities so that adequate service ratios are maintained. This increase in population would require the construction or expansion of library facilities, which could result in adverse environmental impacts. Environmental impacts could result from expansion of the Mesa Verde Library; but the size of the expansion is currently unknown, and the OCPL project would have to complete applicable environmental review under CEQA once a project is determined to be need. Additionally, payment of property taxes and development impact fees of cumulative projects would ensure OCPL is able to maintain existing library services, and standards for its space and collections. Impacts would be less than cumulatively considerable.

Significance without Mitigation: Less than significant.

3.13.6 References

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3.14 RECREATION

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts of the Fairview Developmental Center Specific Plan (proposed project) (FDCSP) to the City of Costa Mesa's parks and recreation facilities.

Notice of Preparation Comments

The City received two comments regarding recreation during the Notice of Preparation (NOP) comment period. On December 3, 2025, the California Department of Fish and Wildlife noted that the proposed project's open space is less than the required acreage per the existing land use designation. Another commenter asked if a City soccer field would be involved in the project and if the City would provide recreational programming for the project. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, Introduction, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the comment letters.

3.14.1 Regulatory Framework

STATE

California Government Code

The Government Code (Sections 65560–65568) requires a general plan to include an open space element to address: the preservation of natural resources, managed production of resources, outdoor recreation, public health and safety, support of military installations, and protection of places of cultural or historical interest. Building permits, subdivision approvals, and zoning approvals must be consistent with the open space plan. The Public Resources Code (Section 5076) also requires general plans to consider demands for trail-oriented recreational use, demands in developing open-space programs, the feasibility of integrating its trail routes with appropriate segments of the state system. Cities may also create a separate parks and recreation element as part of or in addition to an open space and conservation element.

California Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California's Public Park Preservation Act of 1971. Under the Public Resources Code, cities and counties may not acquire any real property that is in use as a public park for any nonpark use unless compensation, land, or both are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

Quimby Act

The Quimby Act (California Government Code Section 66477) authorizes cities and counties to require developers to dedicate land as parkland, pay in-lieu fees, or both as a condition of approval for a tentative or final tract map or parcel map for a residential subdivision. Revenue generated through the Quimby Act cannot be used for the operations or maintenance of existing park facilities but used for acquiring land for new parks or expansion of existing parks, or new recreational facilities. The Quimby Act also sets a statewide standard of three acres of parkland for every 1,000 residents unless the existing neighborhood and community park area exceeds that limit, in which case the city or county may establish a higher standard.

Mitigation Fee Act

The California Mitigation Fee Act (Government Code Sections 66000 et seq.) allows cities to impose fees on development projects to mitigate the project's impact on a city's ability to provide specified public facilities. To comply with the Mitigation Fee Act, a city must follow four primary requirements: 1) Make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee; 2) Segregate fee revenue from the general fund to avoid commingling capital facilities fees and general funds; 3) Make findings each fiscal year describing the continuing need for fees that have been in the possession of the city for five years or more and that have not been spent or committed to a project; and 4) Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

LOCAL

City of Costa Mesa General Plan

The Open Space and Recreation Element of the General Plan includes the following policies related to park facilities and recreation services within the City:

- **Policy OSR-1.1.** Maintain a system of Neighborhood and Community Parks that provide a variety of active and passive recreational opportunities throughout the City.
- **Policy OSR-1.2.** Provide parks and recreation facilities appropriate for the individual neighborhoods in which they are located and reflective of the needs and interests of the population they serve.
- **Policy OSR-1.3.** Pursue the acquisition and development of pocket and neighborhood parks within park-deficient areas, as identified in Figure OSR-3: Planning Areas and Underserved Park Areas.
- **Policy OSR-1.4.** Prioritize the acquisition of land for parks in underserved neighborhoods.

- **Policy OSR-1.5.** Maximize public space by requiring plazas and public gathering spaces in private developments that can serve multiple uses, including recreation and social needs.
- **Policy OSR-1.6.** Provide maximum visibility and accessibility for future public parks by locating facilities in close proximity to public streets.
- **Policy OSR-1.8**. Require that parks and recreation facilities reflect new trends and population changes, and are developed with facilities appropriate to all ages, including athletic fields, active play areas, passive open space, tot lots, and picnic areas.
- **Policy OSR-1.13**. Design and reform parks to reflect the latest recreational features that respond to demographic changes and community needs.
- **Policy OSR-1.18**. Provide a minimum of 4.26 acres of parkland per 1,000 residents.
- **Policy OSR-1.20.** Enhance pedestrian, bicycle, and transit linkages to meet the needs of residents and to provide better access to parks, recreation, and public spaces.
- **Policy OSR-1.21.** Provide opportunities for public access to all open space areas, except where sensitive resources may be threatened or damaged, public health and safety may be compromised, or access would interfere with the managed production of resources.

City of Costa Mesa Municipal Code

Municipal Code Title 13, Chapter XII, Article 4, Park and Recreation Impact Fees, requires the dedication of land and/or payment of in-lieu fees by residential development projects meeting certain criteria in the amount of 4.26 acres per 1,000 residents added by such residential projects. The City's parkland standard is 4.26 acres per 1,000 residents.

City of Costa Mesa Parks, Recreation, and Open Space Master Plan

The Costa Mesa Parks, Recreation, and Open Space Master Plan Update serves as a guide and implementation tool for the management and development of parks and recreational facilities and programs for the City of Costa Mesa. The Costa Mesa Parks, Recreation, and Open Space Master Plan identified top priority facilities that include: walking/jogging/running/hiking trails, soccer fields, lights (sports field), open space, multi-use fields with lights, swimming pool, picnic tables, skate park, bike paths, pocket/neighborhood parks, and restrooms.

Throughout the Master Plan Update process numerous sites have been evaluated for the potential to provide recreational opportunities in the community to meet facility and demand needs. The Fairview Development Center (project site) has been identified as a park opportunity site (Costa Mesa 2018).

3.14.2 Existing Conditions

EXISTING LAND USES

The project site is currently developed with the Fairview Developmental Center (FDC) and associated facilities, and no parkland currently exists on-site. The former recreational facilities at the FDC, as part of the Goodell Education Center, have remained vacant and are not open or allowable for public use. Therefore, they are not considered existing parkland, recreational facilities, or open space. However, the proposed project also includes offsite improvements at the Costa Mesa County Club. The Costa Mesa Country Club includes the 237.2 acre municipal golf course with two 18-hole golf courses, a pro shop, coffee shop, banquet facility and driving range (Costa Mesa 2026, Costa Mesa 2018).

EXISTING PARK FACILITIES IN COSTA MESA

The Parks and Community Services Department provides the citizens of Costa Mesa with a diverse variety of high-quality recreation facilities, programs, and services. Table 5.14-1, Summary of Parks in Costa Mesa, includes the City's parks, their locations, and acreages (Costa Mesa 2023). The Costa Mesa Parks, Recreation, and Open Space Master Plan identifies the western portion of the project site is within the 1/2-mile service radius of a park while the western portion of the project site is within an area underserved by parks (Costa Mesa 2018). Fairview Park is the closest park, 0.5 mile west of the plan area. In addition, the County of Orange maintains a regional park system comprising 39,000 acres in 25 urban and wilderness parks (Orange County 2025).

Table 3.14-1 Summary of Parks in Costa Mesa

Park Name	Location	Amenities	Acres
Balearic Park	1975 Balearic Dr.	2 basketball courts, 1 restroom, 2 utility fields; 1 playground; 3 picnic tables; 1 drinking fountain; 1 volleyball court	10
Estancia Park	1900 Adams Ave	1 restroom; 2 barbecues; 1 shelter; 6 picnic tables; 3 drinking fountains	21
Mesa Verde Park	1795 Samar Dr.	2 barbecues, 1 shelter, 3 picnic tables, 1 playground	2.5
Moon Park	3377 California St.	2 playgrounds and 3 picnic tables	1.7
Smallwood Park	1646 Corsica Pl.	1 restroom, 2 playgrounds, 1 softball field, 3 picnic tables	3.4
Suburbia Park	3302 Alabama Cir.	Restrooms	0.6

Table 3.14-1 Summary of Parks in Costa Mesa

Park Name	Location	Amenities	Acres
Tanager Park	1780 Hummingbird Drive	2 playgrounds, 2 basketball courts, 1 drinking fountain, 2 picnic tables, 2 volleyball courts	7.4
Wakeham Park	3400 Smalley St.	1 restroom, 6 barbecues, 2 playgrounds, 2 basketball, 3 shelters, 12 picnic tables, 1 drinking fountain, 1 exercise area, 1 volleyball court,	10
Wimbledon Park	3440 Wimbledon Way	4 exercise areas, 2 playgrounds, 1 basketball court, 7 picnic tables, and 2 drinking fountains	3.36
Del Mesa Park	2080 Manistee Dr.	1 restroom, 1 barbecue, 1 playground, 1 volleyball court, 1 shelter, 8 picnic tables, 1 drinking fountain, and 1 basketball court	4.0
Gisler Park	1250 Gisler St.	1 barbecue, 1 playground, 1 volleyball court, 3 picnic tables, and 1 drinking fountain	4.1
Paularino Park	1040 Paularino Ave	1 playground, 1 shelter, and 2 picnic tables	2.3
Shiffer Park	3143 Bear St.	1 restroom, 2 barbecues, 2 playgrounds, 1 basketball court, 1 shelter, 8 picnic tables, 1 drinking fountain, and 1 volleyball court	6.72
Neth Park	111 Fair Drive	1 picnic table	2.60[1]
Tewinkle Park	970 Arlington Dr.	3 restrooms, 5 barbecues, 1 playground, 1 baseball field, 12 tennis courts, 1 lake, 6 bleachers, 1 amphitheater, 3 shelters, 30 picnic tables, 2 drinking fountains, 2 electric outlets, 2 softball fields, 1 utility field, 1 basketball court, and 1 greenbelt	49
Wilson Park	360 W. Wilson St.	1 barbecue, 1 shelter, 1 sand volleyball court, 1 playground	3.45
Bark Park	970 Arlington Dr.	Small and Large Dog Park	2.0
Ketchum-Libolt Park	2150 Maple St.	Playground, and 3 picnic tables	0.34
Shalimar Park	782 Shalimar Dr.	Playground	0.16
Canyon Park	970 Arbor St.	Playground, 3 barbecues, and 9 picnic tables	1.45
Fairview Park	2525 Placentia Ave	Fairview Park, with two Nationally Registered Cultural Resource Historic Sites and five habitat ecosystems, is a regional gateway to the Santa Ana River Trail, Orange Coast River	195

Table 3.14-1 Summary of Parks in Costa Mesa

Park Name	Location	Amenities	Acres
		Park, and Orange County Talbert Regional Park, offering recreational opportunities, a miniature railroad, and special events.	
Lions Park	570 W. 18th St.	1 restroom, 47 bleachers, 1 playground, 1 electrical outlet, 1 shelter, 13 picnic tables, 1 drinking fountain, and 1 softball field	10
Marina View Park	1035 W. 19th St.	1 barbecue, 1 playground, 1 shelter, 2 picnic tables, and 1 drinking fountain	2.5
Vista Park	1200 Victoria St.	1 restroom, 1 barbecue, 1 drinking fountain, 6 picnic tables, and 1 playground	7.0
Brentwood Park	265 E. Brentwood Pl.	1 playground, 1 shelter, 6 picnic tables, and 1 volleyball court	1.45
Harper Park	425 E. 18th St.	1 playground and 2 picnic tables	1.0
Heller Park	257 E. 16th St.	1 restroom, 1 playground, 1 shelter, 4 picnic tables, 1 drinking fountain, 1 greenbelt	2.6
Jordan Park	2141 Tustin Ave	1 playground, 1 barbecue, and 4 picnic tables	3.5
Lindbergh Park	220 E. 23rd St.	2 picnic tables and 1 playground	1.0
Perez Park	308 University Dr	Playground and bike rack	0.12
Pinkley Park	360 E. Ogle St.	1 barbecue, 1 playground, and 3 picnic tables	2.58
Costa Mesa Skate Park	900 Arlington Drive	The 15,000-square-foot skate park features street elements, a kidney-shaped pool and a bowl	0.34[1]
Jack R. Hammett Sports Complex	2750 Fairview Road	Stadium lighting at several soccer fields	18.5[1]
Total			**381.67**

Source: Costa Mesa 2025.

[1] Total acreage calculated by Google Earth.

Regional Recreation Facilities

Talbert Regional Park, is a park with a northern portion consisting of approximately 91.5 acres and a southern portion consisting of approximately 88.5 acres at 1298 Victoria Avenue in the City of Costa Mesa. The trail system at Talbert Regional Park allows for observation of natural resources and links to other parks up and downstream along the Santa Ana River. The trails are accessible to bicycle and hiking use, and contain picnic areas, restrooms, and scenic overlooks

(OC Parks 2026a). Talbert Regional Park is the closest regional park, approximately 1.75 miles southwest of the project site.

The Santa Ana River Trail, a National Recreation Trail, extends 30 miles in Orange County from Huntington Beach to the Riverside County boundary; and another 40 miles intermittently in parts of Riverside and San Bernardino Counties. The north end of the Trail is currently in the City of San Bernardino in San Bernardino County; at completion, the Trail will extend 110 miles to Big Bear Lake in the San Bernardino Mountains. An access trail to the Santa Ana River Trail extends west of the project site boundary. The River channel, an engineered channel, is owned and operated by the Orange County Flood Control District and is not open to the public (San Bernardino County 2026).

Mile Square Regional Park, a 607-acre urban park at 16801 Euclid Street in the City of Fountain Valley, is 2.8 miles north of the project site by road; amenities include three regulation golf courses, three soccer fields, three baseball courts and three softball diamonds, an archery range, a nature area, two fishing lakes, bike and paddle boat concessions, and picnic areas with shelter (OC Parks 2026b).

3.14.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to recreation if it would:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

METHODOLOGY

To assess the potential impacts of the proposed project on recreational resources, existing conditions were evaluated using publicly available records, including the City of Costa Mesa Parks and Recreation Department, the Costa Mesa Municipal Code, and the City's General Plan. Baseline recreational facilities were identified, and parkland supply and demand were analyzed relative to the City's standard of 4.26 acres per 1,000 residents.

Projected population from the proposed project (Section 5.12, *Population and Housing*) was used to estimate future recreational demand. Parkland needs and potential deficiencies were determined by comparing projected population-generated demand to existing facilities, consistent with CEQA Guidelines and the City's established parkland standards. The FDCSP's Development and Design Regulations assisted in determining how the project would reach the City's Standard.

3.14.4 Project Impact Analysis

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

DIRECT IMPACTS

Typically, residential projects increase the demand for park and recreational facilities. As discussed in Section 5.12, *Population and Housing*, the proposed project would include up to 4,000 dwelling units. Development of 4,000 dwelling units is expected to induce population growth by approximately 9,926 people.

The project site is adjacent to the Costa Mesa Country Club, which is a municipal golf course that is open to the public. The closest park to the project site is Fairview Park approximately 0.5 mile west of the project site. The western portion of the project site is within an area underserved by parks (Costa Mesa 2018). The City's parkland standard is 4.26 acres per 1,000 residents for new development. Therefore, the proposed increase in residents would require the addition of 42.28[1] acres of parkland.

The proposed project includes a minimum of 14-acres of public open spaces (see Figure 2-6, *Conceptual Land Use Plan*). This public open space is separate from, and provided in addition to the private and common open space that the FDCSP requires for new residential development.[2] The public open space included in the proposed land use plan would support a range of potential uses, including neighborhood parks and plazas, trails for walking and biking, recreation centers and cultural amenities, pocket parks, and informal gathering areas. In addition, the proposed project would provide trail connections. The Shelley Circle Loop Trail will be located

[1] 4.26 acres (9,926 proposed residents ÷ 1,000 residents) = 42.28

[2] Public Open Space includes public parks, trails, plazas, and other types of open spaces available to the general public. It does not include private and common open space that is considered an on-site amenity for multifamily housing and is primarily accessible by the residents of the housing development, unless the common open space is made publicly accessible.

along the edge of the property, adjacent to the golf course, with a potential connection to the Tanager Trail. One or more paseos will provide an off-road walking and biking path across the site, connecting neighborhoods to parks and the Shelley Circle Loop Trail.

Despite the inclusion of the 14-acre public open space, the proposed public open space identified within the project site would not fully satisfy the parkland demand of the proposed project. However, FDCSP Chapter 6, Open Space, Landscaping & Public Art, requires that new development achieve the 4.26 acres of parkland per 1,000 residents. This standard can be met through land dedication, park improvements,[3] and in-lieu fees; however, no less than 14 acres of publicly accessible open space shall be provided for the FDC site. In addition, private open space within housing spaces (balconies, and enclosed patios) and private owned publicly accessible open space including plazas, and other park areas (see Section 6.2.1, Open Space Standards, of the FDCSP) contribute to the overall open space available on-site. With implementation of the Open Space Standards of the FDCSP, in combination with land dedication and payment of impact fees, the proposed project would meet the General Plan Policy OSR-1.18 standard of 4.26 acres per 1,000 residents.

The combination of on-site public open space, private and common open space (amenities) and the payment of the Park and Recreation Impact Fees —as well as property and sales tax revenue—would also contribute to improvements and maintenance of existing recreation facilities, which would ensure that the proposed project would not cause or accelerate substantial deterioration of existing neighborhood or regional recreational facilities. Therefore, this impact is **less than significant**.

INDIRECT IMPACTS

Additionally, the proposed project could generate up to 74 new employment positions. The new employment positions are expected to be filled by individuals already residing in the City and surrounding areas. Future employees will have access to passive recreational space throughout the project site and would be expected to utilize on-site recreational facilities on a short-term basis during breaks or after work. For this reason, new employees are not expected to relocate for employment opportunities on-site or have an impact on recreational facilities. Thus, no impacts from indirect population growth (employment opportunities) are expected.

Significance without Mitigation: Less than significant.

[3] Publicly accessible and privately owned open spaces can also count toward this requirement, as approved by the Community Services Department.

b) Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As stated in Impact 3.14-1, the proposed project involves construction of a minimum of 14 acres of public open space, as well as the construction of the Shelley Circle Trail, and a secondary access road on the municipal golf course. Additionally, FDCSP Chapter 6, Open Space, Landscaping & Public Art, requires that new development achieve 4.26 acres of parkland per 1,000 residents through land dedication, park improvements,[4] and in-lieu fees. Although construction of a secondary access road would require reconfiguration of the Municipal golf course, a slight decrease in the amount of playable golf course area may occur; however, the golf course would be reconfigured to maintain the existing number of golf course holes with a goal to maintain par and yardage to the greatest extent feasible. The final reduction in playable surface area is unknown since the final location and configuration of the secondary access road is conceptual and the design of the golf course reconfiguration is not a part of the proposed project, but a Master Developer will need to pay for and construct these improvements. Despite the reduction in the amount of golf course area the FDCSP will require that future development meet open space requirements, as discussed in Impact 3.14-1. No expansions would occur or reconfiguration may cause adverse physical effects on the environment. Impacts from constructing potential neighborhood parks and plazas, trails for walking and biking, recreation centers, cultural amenities, pocket parks, informal gathering areas, and reconfiguration of the municipal golf course within the plan area are addressed throughout the EIR (see Section 3.2, *Air Quality*, and Section 3.11, *Noise*), and no additional adverse physical impacts on the environment would occur.
The project would not require new and/or expanded facilities other than those already included as part of the proposed project. In addition, the proposed project would be required to pay in-lieu fees to the City to provide improvements and maintenance of existing recreation facilities. Therefore, a **less than significant** impact would occur.

Significance without Mitigation: Less than significant.

3.14.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to recreation?

Growth within the City would increase demand for parks and recreational facilities. The identified cumulative development listed in Chapter 3, *Environmental Analysis*, Table 3-2, and

[4] Publicly accessible and privately owned open spaces can also count toward this requirement, as approved by the Community Services Department.

other projects within the City would contribute to an increase in parks and recreational facilities. The cumulative population and the proposed project would be subject to the same federal, State, and local regulations. Cumulative projects would develop their own parkland or open space on-site and, if deemed necessary, pay Park and Recreation Impact Fees. In addition, the identified cumulative projects would also pay property, sales, and utility taxes and fees supporting the City's General Fund, part of which would be available for the operation and development of new parks and recreational facilities.

Based on the 2023 American Community Survey, the City of Costa Mesa's population is 110,523 persons and is served by approximately 381.67 acres of park space, resulting in 3.45 acres of parkland per 1,000 residents. To achieve the General Plan Policy OSR-1.18, the City would need to provide 471 acres of parkland within the City, which is approximately 89 acres of additional parkland citywide. Therefore, the City is currently considered parkland deficient, and various areas throughout the City are considered underserved by parkland (Costa Mesa 2018). While the City is considered park deficient based on the City's General Plan policy, residents in Costa Mesa have access to regional parks that are not counted towards the City's park standard, including Talbert Regional Park (180 acres), the Santa Ana River Trail, and Mile Square Regional Park (607-acres). In addition, many residences of Costa Mesa are in close proximity to Huntington State Beach, Newport Beach, and other beaches in the vicinity. Neary regional parks and beaches help offset local parkland demands

Moreover, the FDCSP would not cumulatively contribute to the City's parkland deficit because the FDCSP would require development within the plan area to achieve the City's higher standard of 4.26 acres per 1,000 people and thus meet General Plan Policy OSR-1.18. Therefore, cumulative impacts of the proposed project would be less than significant through land dedication, park improvements, and in lieu fees. Impacts of the proposed project would not be cumulatively considerable.

3.14.6 References

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3.15 TRANSPORTATION

This section of the DEIR evaluates the potential for implementation of the proposed Fairview Developmental Center Specific Plan (proposed project) to impact transportation.

The analysis in this section is based in part on the following technical reports:

- *Fairview Development Center Specific Plan VMT Assessment*, Fehr and Peers, January 2026 (DEIR Appendix J.1)
- *Fairview Development Center Specific Plan Transportation Study*, Fehr and Peers, February 2026 (DEIR Appendix J.2)

TERMINOLOGY

Level of Service. Roadway capacity is generally limited by the ability to move vehicles through intersections. LOS is a standard performance measurement to describe the operating characteristics of a street system in terms of the level of congestion or the delay experienced by motorists. Service levels range from A through F, that is, traffic conditions ranging from best (uncongested, free-flowing conditions) to worst (total breakdown with stop-and-go operation).

Vehicles Miles Traveled. VMT measures the number of trips and the lengths of those trips for the total number of miles that vehicles will travel on a roadway system. It is used to better assess traffic impacts on greenhouse gas emissions, air quality, and energy. The number of miles of vehicle travel is an indicator of the travel levels on the roadway system by motor vehicles.

Total VMT. Total VMT represents all VMT generated by a project or in a defined area, such as a traffic analysis zone or city boundary, on a typical day, weekday, or weekend.

VMT per Service Population. Service population (SP) counts residents and employees. VMT/SP measures the transportation "efficiency" of a project or plan and is defined as VMT generated on a typical weekday per person who lives and/or works in the designated area.

NOTICE OF PREPARATION COMMENTS

The City received a number of comment letters on the Notice of Preparation (NOP) related to transportation. The comment letters voice concerns regarding traffic impacts along Harbor Boulevard and Fair Drive due to the proposed development's density. Suggestions include considering Merrimac Way as an access point and evaluating a potential access point west of the project site for better connectivity to nearby schools. Questions were posed about traffic management between State Route 55 and the project site and the proposed project's effects on adjacent neighborhoods. Recommendations designs include high visibility crosswalks, complete street designs, and improving active transportation infrastructure. Additionally, it was suggested

to establish freight pick-up times that avoid peak hours, designate freight-only parking, and consider shared drop-off locations; safety measures and alternate transportation facilities should be prioritized during construction; and the project's emergency evacuation plan needs clarification regarding street load capacity for evacuees.

The relevant transportation issues raised in these comment letters are addressed in this section. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the comment letters.

3.15.1 Regulatory Framework

STATE

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. The legislature found that with the adoption of SB 375, the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle-miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by Assembly Bill (AB) 32. Additionally, AB 1358, described subsequently, requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

SB 743 started a process that fundamentally changes transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts in many parts of California (if not statewide). As part of the new CEQA Guidelines, the new criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (California Public Resources Code Section 21099[b][1]). On January 20, 2016, the Governor's Office of Land Use and Climate Innovation (LCI), formerly the Governor's Office of Planning and Research, released proposed revisions to its CEQA Guidelines for the implementation of SB 743. LCI developed alternative metrics and thresholds based on VMT. The guidelines were certified by the Secretary of the Natural Resources Agency in December 2018, and automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. As of July 1, 2020, lead agencies are required to consider VMT as the metric for determining transportation impacts under CEQA. The guidance provided relative to VMT significance criteria is focused primarily on land use projects, such as residential, office, and retail uses. However, as noted in the updated CEQA Guidelines Section 15064.3, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT.

REGIONAL

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 2024)

The Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy is named Connect SoCal 2024 in its current version. The plan time frame is 2024 to 2050 and covers the entire SCAG region in Southern California, including Orange County. This is a long-range vision plan, focusing on future mobility and housing needs along with economics, environmental issues, and public health. The projects defined in the plan include highway improvements, railroad grade separations, bicycle lanes, new transit hubs, and roadway bridges. Goals of the strategy include preserving open space areas, improving public health and roadway safety, supporting the goods movement industry, and utilizing resources more efficiently (SCAG 2024).

Orange County Transportation Authority Long Range Transportation Plan

The 2022 Long Range Transportation Plan (LRTP) developed by Orange County Transportation Authority (OCTA) presents a comprehensive vision for Orange County's transportation system through the year 2045. The plan identifies seven strategies that guide the development and implementation of future projects for the county, focusing on alternative transportation modes such as transit and active transportation, embracing new technologies, and improving the operational performance of existing infrastructure. Projects identified within the LRTP help inform the Regional Transportation Plan/Sustainable Communities Strategy developed by SCAG. The current 2022 plan identifies $57.3 billion dollars in potential improvements, split between transit, local streets, and highways (OCTA 2022).

OCTA is currently undergoing public engagement for the 2026 LRTP, and a draft is expected in the summer of 2026. The final 2026 LRTP is scheduled to be completed in fall 2026 (OCTA 2026).

Orange County Transportation Authority Master Plan of Arterial Highway

OCTA works to coordinate and link local street systems through the Master Plan of Arterial Highways (MPAH), a plan to ensure the regional arterial highway network properly supplements the County's freeway system. The MPAH is seen as a national model that ensures cities are planning their street grids consistently and with consideration for regional traffic. Specifically, the MPAH identifies six roadway classification types for arterials; each city's general plan must be consistent with these classifications. Moreover, the plan lists full buildout design characteristics such as lane configurations and right-of-way widths.

According to the 2026 MPAH, all arterials adjacent to the project site are built out consistent with their MPAH designation except for Wilson Avenue, which is programmed as a four-lane secondary arterial.

OC Transit Master Plan

Supplementing OCTA's LRTP, the OC Transit Master Plan (2024 OC Transit Vision) is a 30-year plan that focuses on enhancing and expanding public transit service in Orange County. The plan identifies corridors where high-quality transit should be invested to generate maximum transit ridership and serve important destinations in the County. Complementing this network of enhanced transit, the plan provides recommendations for OCTA's existing fixed route and paratransit services; transit services in operation or planned by cities; and integration with other transit modes like walking, biking, and rideshare.

LOCAL

City of Costa Mesa Active Transportation Plan

As an amendment to the City's General Plan, the City of Costa Mesa Active Transportation Plan (ATP) was adopted in 2018, providing a framework for the planning and implementation of pedestrian and cyclist improvements in the City. The plan details several key goals and policies such as prioritizing Class I shared-use paths for all new developments, ensuring developments provide adequate bike parking for cyclists, and closing gaps in the City's bicycle facilities. The plan also coordinates with regional active transportation plans proposed by OCTA and neighboring cities.

The Active Transportation Plan also updated the City's Master Plan of Bikeways, which identified planned corridors for new off-street multi-use trails, on-street bike lanes, and bicycle routes. Table 3.15-1, *Existing and Proposed Bicycle Facilities, Active Transportation Plan*, lists the existing and planned bicycle infrastructure in Costa Mesa as part of the Master Plan of Bikeways.

Table 3.15-1 Existing and Proposed Bicycle Facilities, Active Transportation Plan

Class Designations	Mileage	Proposed New Mileage	Total Mileage
Class I (Multi-Use Paths)	9	7.9	16.7
Class II (On-Street Bicycle Lanes)	32.2	21.27	53.47
Class III (Bicycle Boulevards)	0	9.55	9.55
Class III (Bicycle Routes)	2	7.9	9.9
Class IV (Cycle Tracks)	0	6.63	6.63
Total	**43.2**	**53.05**	**96.25**

Source: Costa Mesa 2018.

City of Costa Mesa Local Roadway Safety Plan

In 2022, the City completed an LRSP, which serves as a framework to identify, analyze, and develop traffic safety enhancements on the City's roadway network. The plan focuses on addressing areas with historically high rates of traffic collisions while also highlighting opportunities for systemwide improvements. Potential strategies are largely focused on addressing the five emphasis areas of addressing speeding, protecting pedestrians and bicyclists, implementing signal improvements, improving safety for aging drivers, and reducing impaired driving. Harbor Boulevard was identified as a corridor with significant crash rates that should be prioritized for future treatments (Costa Mesa 2022).

City of Costa Mesa Pedestrian Master Plan

The Costa Mesa Pedestrian Master Plan (CMPMP) offers additional support to the City's 2018 ATP. The CMPMP supplements the ATP by providing additional infrastructure, programs, and policy recommendations specific to improving the pedestrian experience in the City (Costa Mesa 2024). The CMPMP identifies several key corridors including Harbor Boulevard and Fairview Road that warrant treatments such as widened sidewalks, improved crosswalk markings, and signalized right turns (Costa Mesa 2024).

City of Costa Mesa General Plan

The City's 2015-2035 General Plan Circulation Element prioritizes establishing a comprehensive, multimodal transportation network that balances the needs of pedestrians, cyclists, transit users, and motorists. The Circulation Element includes the following policies that would apply to the proposed project:

- **Policy C-1.10.** Encourage non-motorized transportation in residential areas by providing sidewalks, implementing pedestrian and bicycle friendly design of local streets, and incorporating street trees in new projects wherever feasible.
- **Policy C-4.8.** Require discussion of transportation system management (TSM) and TDM measures in all EIRs prepared for major projects.
- **Policy C-4.9.** Encourage the integration of compatible land uses and housing into major development projects to reduce vehicle use.
- **Policy C- 4.14.** Encourage new development along major transit corridors to provide safe and efficient access to transit stops and public sidewalks.
- **Policy C- 5.13.** Require that new development projects improve access to and accommodations for multimodal transportation, provide pedestrian access that serves the intensity of use and compliments the existing pedestrian network, and whenever feasible

incorporate pedestrian improvements into the public right- of-way as a part of conditions of approval.

- **Policy C- 5.14.** Require developers of new building and redevelopment/ reuse projects as part of the project development review process that are located along bus routes to pay a designated fair share of the cost of providing improved bus stop facilities and related street furniture or, where appropriate, dedicate land for improved bus stop facilities.
- **Policy C-7.2.** Plan and install new bicycle lanes on Major Arterials, where feasible and appropriate.
- **Policy C-7.4.** Where feasible, Class I shared - use paths should be a priority for future developments.
- **Policy C-7.13.** Prioritize safe access to major regional trails such as the OC Loop/ Santa Ana River Trail and the Newport Back Bay Trail System. Where feasible, plan and provide a continuous low -stress Class I and/ or Class IV facility from east to west across the city between these facilities.
- **Policy C-9.3.** Require new developments provide adequate bicycle parking and pedestrian access.

City of Costa Mesa Municipal Code

Title 13, Chapter XII, Article 3, Section 13-275: Development Project Review Procedures

Development projects generating 100 or more vehicle trips during peak hours require a traffic impact study, which must be funded by the developer. The study determines the area for analysis and proposed mitigation measures related to traffic impacts. Mitigation can involve payment of development impact fees or construction of circulation improvements, integrated as approval conditions for the project. Approval hinges on timely completion of these improvements and mitigation at affected intersections, in line with general plan traffic capacity ratios. If a transportation demand management program is implemented to reduce vehicle trips, it must follow specific reporting and reevaluation requirements. Additionally, any change in project use that may increase traffic generation will prompt a reevaluation to ensure adequate traffic capacity in the system.

3.15.2 Existing Conditions

The existing roadway network provides the context of the circulation network around the project site. This network is shown on Figure 3.15-1, *Existing Roadway Network*, which shows the existing area roadway infrastructure in the vicinity of the project site. The major roadways closest to the project site are described below.

EXISTING ROADWAY NETWORK

State Routes

The closest regional highway is State Route 55 (SR-55), east of the project site. It is an eight-lane (four in each direction), north-south freeway route from Yorba Linda to the coastal cities in Orange County. The closest SR-55 interchanges are at Fair Drive and Victoria Street.

Approximately 1.6 miles north of the project site is Interstate 405 (I-405), which is a sixteen-lane (eight in each direction), east-west freeway route from Los Angeles County to Irvine. The closest I-405 interchange is at Harbor Boulevard.

Local Streets

- **Harbor Boulevard** is a north-south major arterial roadway running east of the project site. It is six lanes (three in each direction), with a center median providing turn lanes into the commercial developments along the roadway. There are signalized intersections at Merrimac Way, Fair Drive, the Harbor Center, and Wilson Street.

- **Fair Drive** is the main entrance into the project site. It is an east-west primary arterial. East of Harbor Boulevard, it is four lanes (two in each direction) with a center two-way left-turn lane. West of Harbor Boulevard, the road narrows to a two-lane local street that connects to the current FDC site.

- **Merrimac Way** is a two- -lane, east-west primary arterial east of Harbor Boulevard. West of Harbor Boulevard is a two-lane private road that leads to the Harbor Village Apartments and ends at the FDC site.

- **Shelley Circle** provides the internal circulation on the FDC site. Shelley Circle is a primary local roadway with two lanes, one in each direction. A sidewalk lines the inner portion of the circle. Shelley Circle can be accessed at two points: Fair Drive and Merrimac Way. Shelley Circle loops around the FDC site, with smaller private roadways extending from it to provide circulation between existing buildings. Shelley Circle has recently been improved related to construction of the Southern Regional Emergency Operations Center (SREOC) project and would be maintained as part of the FDCSP.

PEDESTRIAN CONNECTIVITY

Many of the streets near the project site have existing pedestrian infrastructure, such as sidewalks and crosswalks. Traditional sidewalks—generally ranging between three and seven feet in width—line both sides of many nearby streets, including Harbor Boulevard, Victoria Street, Wilson Street, Fair Drive, Mesa Verde Drive East, Adams Avenue, Placentia Avenue, and most of Merrimac Way. Approximately one-to-two-miles west of the FDC site is the Santa Ana River Trail which provides regional connectivity, a multi-use trail that follows along the Santa Ana River. Pedestrians and cyclists can use this trail to access well-known open space areas in the City such as Fairview Park, Talbert Nature Preserve, and Talbert Regional Park

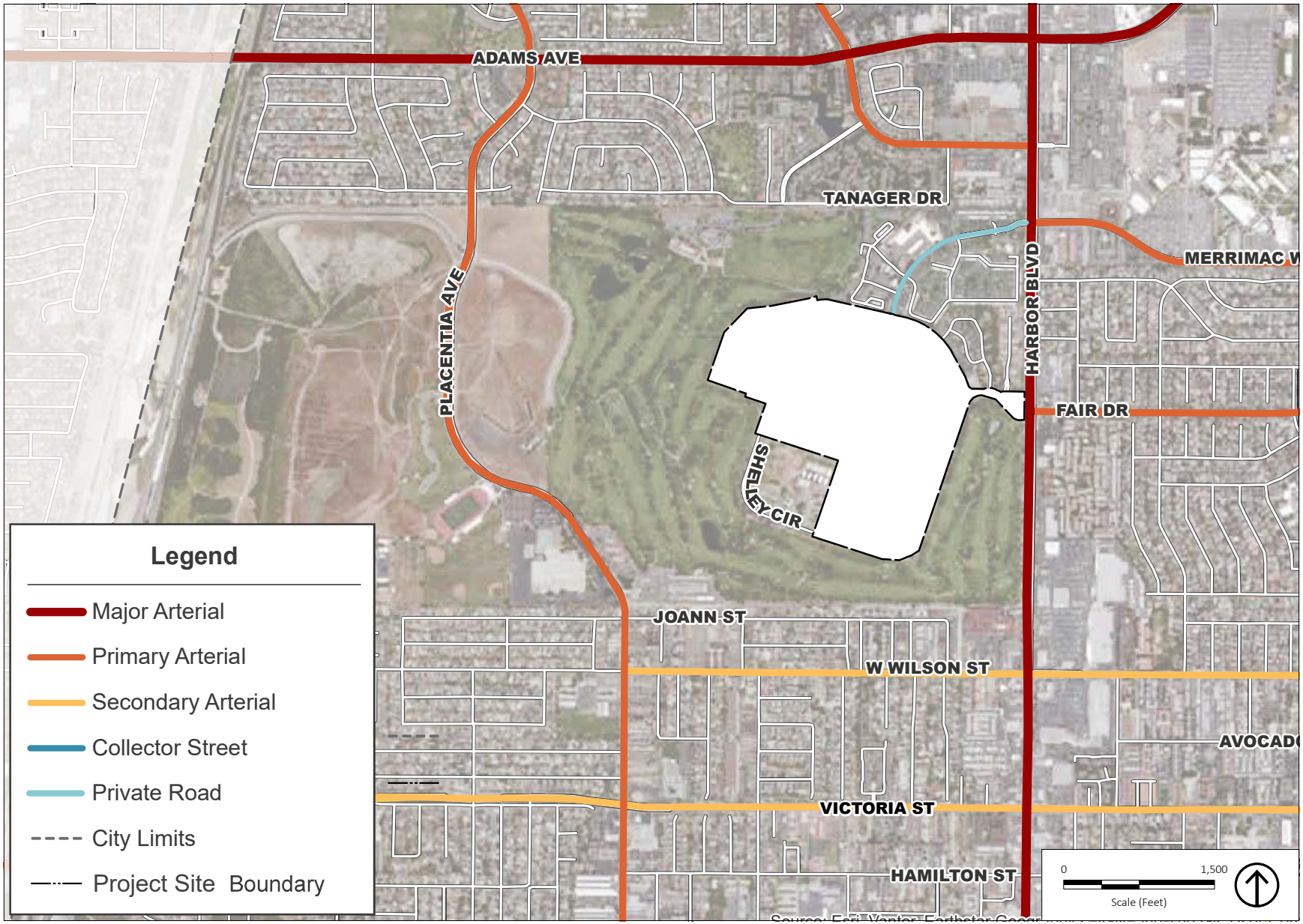
Within the FDC site is a narrow sidewalk along the south side of Merrimac Way, from Harbor Boulevard leading to Shelley Circle. Shelley Circle is lined internally with a single sidewalk for most of the roadway. An interim sidewalk would be added to Shelley Circle as infrastructure and roadway improvements are made for the SREOC.

BICYCLE CONNECTIVITY

Much of the existing bikeway infrastructure is also connected to regional infrastructure, such as the Santa Ana River Trail. Bicycle infrastructure is classified into four categories:

- Class I: Off Street Paved Bicycle Paths and/or Trails
- Class II: On-Street Striped and Signed Bicycle Lanes
- Class III: On-Street Shared-Lane Signed Bicycle Routes (includes designation for route and boulevard)
- Class IV: On-Street and Separate Bikeway (Cycle Track)

Class I bike lanes currently exist to the north, east, and south of the project site along the southern boundary of the Costa Mesa Country Club; along Harbor Boulevard; and parallel to Tanager Drive from the Harbor Boulevard intersection to Golf Course Drive. Many of the trails throughout the community are anticipated to be multiuse paths providing additional connectivity for pedestrians and bicyclists. Figure 3.15-2, *Existing and Proposed Surrounding Bicycle Network,* shows the existing and proposed bicycle network for the project site.



Source: ESRI, Vantor, Earthstar Geographics 2026.

Figure 3.15-1
Existing Roadway Network

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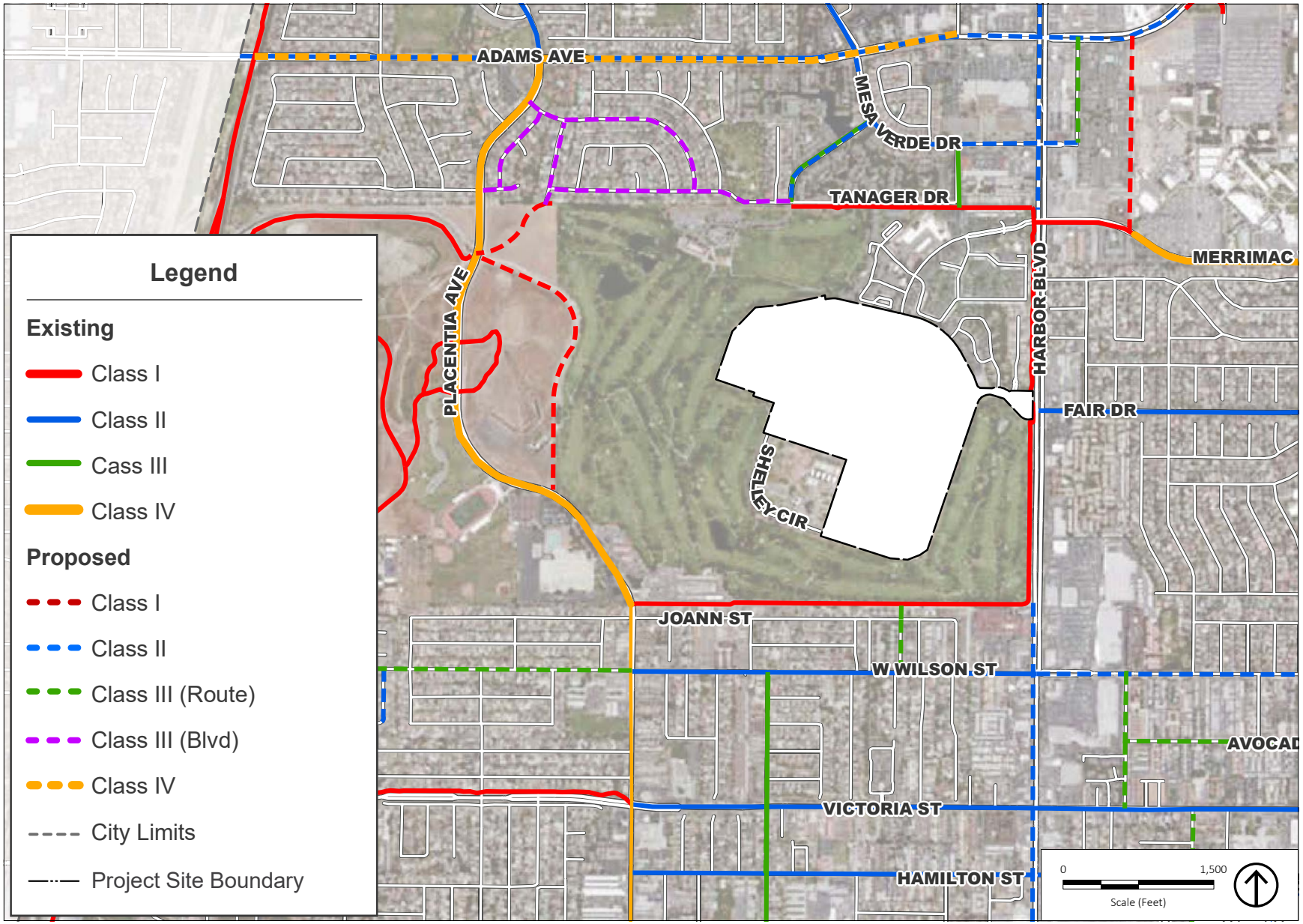

Source: ESRI, Vantor, Earthstar Geographics 2026.

Figure 3.15-2
Existing and Proposed Surrounding Bicycle Network

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PUBLIC TRANSIT

Public transit services in the City of Costa Mesa are provided by the Orange County Transportation Authority (OCTA), which operates both fixed route and paratransit service across all cities in Orange County. Figure 3.15-3, *Bus Stops and Transit Routes*, shows the location of nearby bus stops and the bus routes operating near the project site. The closest bus stops are near the Harbor Boulevard/Adams Avenue intersection (0.6 miles northeast of the project site) and the Harbor Boulevard/Wilson Street intersection (0.3 miles southeast of the project site). The bus routes running closest to the project site are:

- Route 43 (Harbor Boulevard)
- Route 47 (Wilson Boulevard)
- Route 178 (Adams Boulevard)

Paratransit services are also provided by OCTA through OC ACCESS. This service provides transit options for residents who are unable to use traditional fixed-route transit services due to physical or cognitive limitations. OC ACCESS provides service within ¾ miles of traditional fixed routes, which includes the full project site.

3.15.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to transportation if it would:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and pedestrian facilities.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

CITY OF COSTA MESA THRESHOLDS OF SIGNIFICANCE

The City's Transportation Impact Assessment Guidelines list the following draft thresholds of significance for VMT analysis for projects that do not satisfy the City's Project VMT Screening criteria.

Baseline and Cumulative VMT Impacts – Origin-Destination Method

For projects that warrant a full VMT assessment, a project would be forecast to have a significant VMT impact if it results in either of the following conditions:

1. The baseline project-generated VMT per service population exceeds 15 percent below City of Costa Mesa baseline VMT per service population (85 percent of the Costa Mesa baseline VMT per service population), or

2. The cumulative project generated VMT per service population exceeds 15 percent below City of Costa Mesa baseline VMT per service population (85 percent of the Costa Mesa baseline VMT per service population).

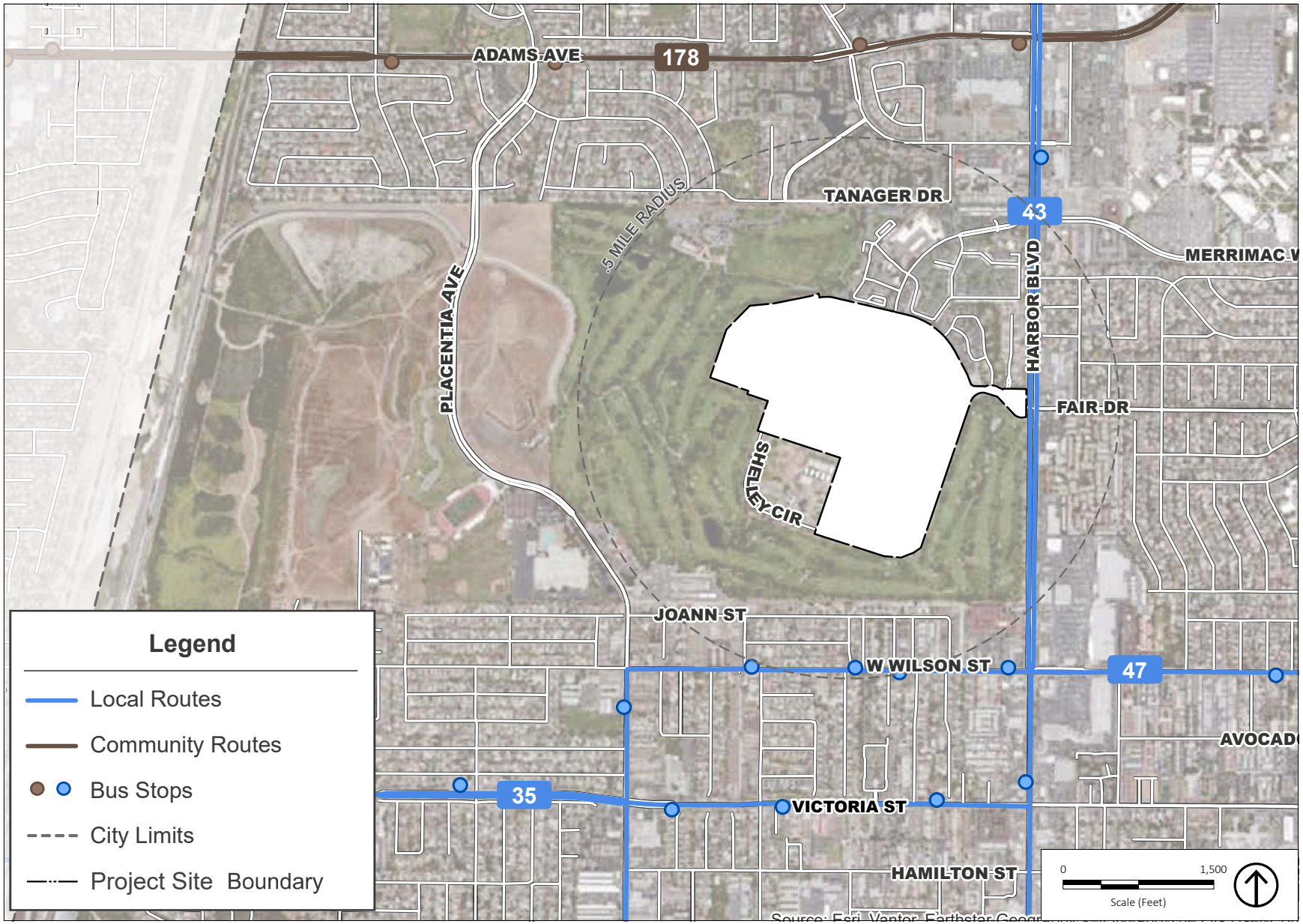
Net Effect on VMT – Boundary Method

The project's effect on VMT would be considered significant if analysis resulted in either of the following conditions:

1. The baseline link-level Citywide VMT per service population increases under the plus project condition compared to the no project condition, or
2. The cumulative link-level Citywide VMT per service population increases under the plus project condition compared to the no project condition.

METHODOLOGY

As part of the proposed project, an analysis was conducted to evaluate the transportation impacts of the proposed project; see the Fairview Development Center Specific Plan VMT Assessment (DEIR Appendix J.1). The analysis evaluates both CEQA transportation impacts and local transportation operations.



Source: ESRI, Vantor, Earthstar Geographics 2026.

Figure 3.15-3
Bus Stops and Transit Routes

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VMT Methodology

As required in the City's Transportation Impact Analysis (TIA) guidelines, this transportation impact analysis presents "project generated VMT" and evaluates the project's effect on VMT.

Baseline and Cumulative VMT Impacts – O-D Method

Consistent with the methodologies outlined in the City's TIA Guidelines, project-generated VMT was estimated using the Origin-Destination (O-D) method, which sums weekday VMT generated by all vehicles across all trip purposes. Project-generated VMT is presented for mixed uses, normalized by the total service population (residents and employees), and compared to the City's draft threshold of significance to determine potential transportation impacts. The air quality, energy, and greenhouse gas emissions analysis utilize O-D VMT methodology. The O-D method accounts for external trips and truck trips; and therefore, provides a more complete estimate of all VMT in the study area for the air quality, energy, and greenhouse gas emission assessment.

Net Effect on VMT – Boundary Method

Consistent with the methodologies outlined in the City's TIA Guidelines, the net effect on VMT was estimated using the boundary method, which calculates the sum of all weekday VMT on the roadway network within a designated boundary.[1] The City's TIA Guidelines recommend that the appropriate boundary is the City limits. Boundary Method VMT estimates VMT by multiplying the number of trips on each roadway segment by the length of that segment. This approach includes all trips, including those trips that do not begin or end in the city boundary. This is the only VMT method that captures the effect of cut-through and/or displaced traffic. Boundary VMT estimates were normalized by the service population for comparative purposes and to determine potential transportation impacts.

VMT Forecasting

The Orange County Transportation Analysis Model (OCTAM) was utilized to prepare VMT forecasts. OCTAM is a trip-based (four-step) travel demand forecasting model calibrated and validated for traffic forecasting in Orange County. Trip-based models use origin-destination

[1] In general there are three different types of VMT analyses: Production/Attraction VMT; Origin-Destination (O-D) VMT; and Boundary Method VMT. The air quality, energy, and greenhouse gas emissions analysis utilize O-D VMT methodology. The O-D method sums all weekday VMT generated by trips with at least one trip end in the study area and tracks those trips to their estimated origins/destinations within the model boundary. The O-D method accounts for external trips and truck trips; and therefore, provides a more complete estimate of all VMT in the study area for the air quality, energy, and greenhouse gas emission assessment.

pairing between geographical locations, designated as Transportation Analysis Zones (TAZ), according to the following sequence:

1. Trip Generation
2. Trip Distribution
3. Mode Choice
4. Network Assignment

VMT Scenarios

Based on the City's thresholds of significance, the proposed project VMT metrics were forecast under the following scenarios:

- Baseline (2025)
- Baseline (2025) Plus Project
- Cumulative (2045) No Project
- Cumulative (2045) Plus Project

Since the OCTAM is reflective of 2019 base and 2050 future conditions, 2025 and 2045 conditions were forecast by interpolating between 2019 and 2050 model forecasts.

Traffic Impact Analysis

While SB 743 eliminated auto delay, level of service, and similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA, a Traffic Impact Analysis was conducted for the Specific Plan and is included as DEIR Appendix J.2 to this DEIR. The purpose of the traffic study is to evaluate the potential circulation system deficiencies that may result when the Specific Plan is developed and where circulation system improvements are needed to maintain acceptable levels of service consistent with the City's General Plan level of service goals and policies. The results of the level of service (LOS) assessments for Year 2025 and Year 2045 traffic conditions are also summarized in Table 4 and Table 5 of Appendix J.2. The traffic study included transportation infrastructure improvements recommendations to maintain Consistency with the City of Costa Mesa's Circulation Element policies (see Appendix J.2) and on-site circulation recommendations to maintain site access and acceptable peak hour operations for the Specific Plan, which will be included as Conditions of Approval (see in Appendix J.2).

3.15.4 Project Impact Analysis

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and pedestrian facilities?

CONSISTENCY WITH CIRCULATION SYSTEM PLANS

Connect SoCal 2024

Connect SoCal 2024 is the primary plan that guides transportation and land use decisions on a regional level. While the Connect SoCal 2024 goals are intended to direct decisions made by SCAG, local land use plans and projects are encouraged to analyze consistency with the Connect SoCal 2024 to ensure that local and regional land use decisions are aligned. An analysis of the proposed project's consistency to the goals of the Connect SoCal 2024 is provided in Table 3.10-1, *Proposed Project Consistency Analysis with Connect SoCal 2024 Goals,* of Section 3.10, *Land Use*.

Orange County Transportation Authority

Long Range Transportation Plan

OCTA's Long Range Transportation Plan (LRTP) includes seven objectives build on the current commitments of OCTA and look beyond the sunset of OC Go to achieve OCTA's long-term goals. These include:

- Path 1: Extend or Modify Programs Funded by OC Go.
- Path 2: Expand Transit Services
- Path 3: Enhance Active Transportation
- Path 4: Explore Mobility Integration
- Path 5: Eliminate Freeway Chokepoints
- Path 6: Embrace Technology
- Path 7: Elevate Maintenance and Resilience Priorities

The proposed project does not apply to Path 1 because identified transportation concepts and projects in alignment with the LRTP goals do not relate to Path 1. The proposed project meets criteria for Path 2 as it is situated along an established transit route, enabling the population from the proposed project to utilize this route, potentially increasing ridership, efficiency, and farebox return to OCTA. The proposed project meets the criteria for Path 4 because its implementation would respond to increasing population and transit demand, with collaboration between the City, developer, and OCTA to enhance services and stops in the area. Additionally, the proposed project aligns with Path 3 by improving the bicycle network and internal

pedestrian network, as shown on Figure 3.15-2. Path 5 is not relevant to the proposed project, and Path 6 is fulfilled through the proposed project's design as an all-electric community that adheres to the California Building Code, CALGreen, and City sustainability features. The proposed project promotes compatibility among land uses that encourage healthy lifestyles, active transportation, increased transit access, and new open spaces, satisfying Path 7. The proposed project mandates that any trees removed during construction under Section 6.3, Landscaping and Trees, be replaced on-site at a ratio of two new trees for every one removed. This requirement aims to limit impacts on trees and provide shading, serving as a resilience tool aligned with Path 7.

OC Transit Master Plan

OCTA is conducting multiple studies to improve bus travel times and service reliability along the Harbor Boulevard corridor. The Pilot Innovative Transit Signal Priority Study aims to enhance transit efficiency and reduce congestion, potentially leading to broader application on other OCTA routes.(OCTA 2025).

The nearest bus stops to the project site are located at the Harbor Boulevard/Adams Avenue intersection (0.6 miles northeast) and the Harbor Boulevard/Wilson Street intersection (0.3 miles southeast). Three bus routes serve the area: Route 43 (Harbor Boulevard), Route 47 (Wilson Boulevard), and Route 178 (Adams Boulevard). Paratransit services are available within ¾ miles of these routes, including the project site. The proposed project would not disrupt these intersections or routes and aims to address rising population and transit demands, working with the City, developer, and OCTA to improve services and stops.

City of Costa Mesa

Active Transportation Plan

The proposed project proposes a network of bikeways that provide enhanced cycling options throughout the area and connect to the City’s existing bikeway network. The bicycle network for the proposed project consists of on-street and off-street facilities, including class I, II, III, and IV options, as depicted on Figure 3.15-2. Class I paths are provided on Shelley Circle along a separated multi-use path that connects around the boundary of the site up to the Tanager trail. An on-site multi-purpose paseo provides a central connection through the new neighborhood. Off-site facilities include the Class I multi-use path along Harbor Boulevard connecting to the Joann Street Trail. Heading west toward Placentia Avenue on the Joann Street Trail provides access to Estancia High School, Fairview Park, and the Santa Ana River Trail. To the east, Merrimac Way provides Class IV Cycle Tracks and Fair Drive provides Class II bike lanes that connect to the nearby campus of Orange Coast College and the OC Fair & Event Center. The proposed project would meet the goals for the City of Costa Mesa Active Transportation Plan and would not interfere with the planned bicycle infrastructure listed in Table 3.15-1.

Local Roadway Safety Plan

Harbor Boulevard was identified as a corridor with significant crash rates that should be prioritized for future treatments (Costa Mesa 2022). The LRSP outlines five emphasis areas to reduce collisions: addressing speeding, protecting pedestrians and bicyclists, implementing signal improvements, improving safety for aging drivers, and reducing impaired driving.

The proposed roadways for the project site provide various types of streets to accommodate all modes of transportation. Figure 3.15-4, *Proposed Roadway Network*, depicts the proposed roadway network. An entry via a Promenade from Fair Drive would allow vehicles, cyclists, and pedestrians to access the project site. Shelley Circle provides another prominent connection, with access from the Promenade south to the SREOC. Internal connections are through local roads that create walkable blocks and form a gridded street network.

The proposed off-site improvements along Harbor Boulevard include construction of a secondary access road to serve the proposed project. This second access point is required to provide safe and efficient ingress and egress for development exceeding 2,000 residential units under the California Fire Code (CFC, Title 24, Part 9, Appendix D, Section D106.2). The improvements would introduce additional roadway infrastructure and intersection controls that are intended to calm traffic and enhance overall safety along the corridor. Specifically, a new roadway is proposed through the golf course that would connect to the existing intersection at Harbor Boulevard and the Harbor Center driveway serving the shopping center. The final roadway alignment would be determined in coordination with the developer and would require redesign and/or reconfiguration of affected golf course holes.

Pedestrian Master Plan

The CMPMP identifies that Harbor Boulevard warrants treatments such as widened sidewalks, improved crosswalk markings, and signalized right turns (Costa Mesa 2024). As shown on Figure 3.15-5, *Intersection Improvements*, upgrades are proposed at the two Harbor Boulevard access points to enhance pedestrian safety and circulation. These improvements can be made within the existing public right-of-way.

Circulation Element

Under CEQA, a project's inconsistency with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities aimed at reducing environmental impacts, can itself signal a significant cumulative impact. In this case, the applicable plan is the Costa Mesa General Plan Circulation Element. The proposed project is consistent with the foundations of these plans and does not conflict with the General Plan's goals and policies. Table 3.15-3, *Proposed Project Consistency with Costa Mesa's Circulation*

Element Goals and Policies, lists key goals and policies of the plan related to transportation that were reviewed to verify consistency.

Table 3.15-3 Proposed Project Consistency with Costa Mesa's Circulation Element Goals and Policies

Goals and Policies	Consistency Analysis
Goal C-1: Implement "Complete Streets" policies on roadways in Costa Mesa.	**Consistent**. The proposed project would design new on-site bicycle and pedestrian facilities to promote multimodal travel and connect to the external pedestrian, bicycle, and transit network.
Policy C-1.10. Encourage non-motorized transportation in residential areas by providing sidewalks, implementing pedestrian and bicycle friendly design of local streets, and incorporating street trees in new projects wherever feasible	**Consistent.** The proposed project would design new on-site bicycle and pedestrian facilities to promote multimodal travel and connect to the external pedestrian, bicycle, and transit network.
Goal C-2: Effectively manage and improve the roadway system.	**Consistent**. The proposed project evaluates the influence of project traffic on adjacent roadway system and identifies appropriate improvements to ensure travel efficiency.
Goal C-3: Enhance regional mobility and coordination	**Consistent**. The proposed project would be implemented in coordination with the City of Costa Mesa and the Orange County Transportation Authority (OCTA) to ensure compliance with the Orange County Congestion Management Plan (CMP), including application of adopted level of service standards and the identification of deficiency plans for intersections that do not meet performance standards. In addition, the proposed project would address regional mobility needs for all travel modes and enhance safety.
Goal C-4: Promote Transportation Demand Management (TDM), transit, and efficiency.	**Consistent.** The proposed project would implement TDM strategies to reduce single-occupancy vehicle trips and coordinate with the OCTA to maintain and potentially enhance transit service adjacent to the project site to encourage transit ridership.
Policy C-4.8. Require discussion of transportation system management (TSM) and TDM measures in all EIRs prepared for major projects.	**Consistent.** The proposed project would implement TDM strategies to reduce single-occupancy vehicle trips and coordinate with the OCTA to maintain and potentially enhance transit service adjacent to the project site to encourage transit ridership**.**
Policy C-4.9. Encourage the integration of compatible land uses and housing into major development projects to reduce vehicle use.	**Consistent.** The proposed project is a mixed-use project in an underutilized site that would introduce residential, commercial, and open space. Mixed use projects are often characterized as having lower VMT which could improve air

Table 3.15-3 Proposed Project Consistency with Costa Mesa's Circulation Element Goals and Policies

Goals and Policies	Consistency Analysis
	quality and minimize greenhouse gas emissions. As noted under Threshold b), of Section 3.15, Transportation, the boundary method VMT analysis identified that the proposed project would have a beneficial impact on VMT/SP in the City.
Policy C- 4.14. Encourage new development along major transit corridors to provide safe and efficient access to transit stops and public sidewalks.	**Consistent.** The Specific Plan accommodates multiple modes of travel within the project site, such as driving, bicycling, walking, and riding the bus.
Goal C-5: Ensure coordination between the land use and circulation systems.	**Consistent**. The proposed project's traffic impacts have been evaluated, and context-appropriate design related to transit oriented development, bicycle and pedestrian connections, and TDM measures have all been recommended as part of the proposed project.
Policy C- 5.13. Require that new development projects improve access to and accommodations for multimodal transportation, provide pedestrian access that serves the intensity of use and compliments the existing pedestrian network, and whenever feasible incorporate pedestrian improvements in to the public right- of-way as a part of conditions of approval.	**Consistent.** The Specific Plan accommodates multiple modes of travel within the project site, such as driving, bicycling, walking, and riding the bus.
Policy C- 5.14. Require developers of new building and redevelopment/ reuse projects as part of the project development review process that are located along bus routes to pay a designated fair share of the cost of providing improved bus stop facilities and related street furniture or, where appropriate, dedicate land for improved bus stop facilities.	**Consistent.** The nearest bus stops to the project site are located at the Harbor Boulevard/Adams Avenue intersection (0.6 miles northeast) and the Harbor Boulevard/Wilson Street intersection (0.3 mile southeast). Three bus routes serve the area: Route 43 (Harbor Boulevard), Route 47 (Wilson Boulevard), and Route 178 (Adams Boulevard). Paratransit services are available within ¾ miles of these routes, including the project site. The proposed project would not disrupt these intersections or routes and aims to address rising population and transit demands, working with the City, developer, and OCTA to improve services and stops.
Goal C-6: Fund and evaluate the City's transportation network.	**Consistent**. The proposed project completed an evaluation of affected roadways and recommended improvements to ensure efficiency. Funding of the improvements is provided by the Development Impact Fees and developer contributions

Table 3.15-3 Proposed Project Consistency with Costa Mesa's Circulation Element Goals and Policies

Goals and Policies	Consistency Analysis
	to identified improvements, to be further evaluated on a project-by-project basis as the proposed project develops. The proposed project also completed a safety assessment to identify high-collision locations and prevailing collision trends. The findings would support the development of appropriate countermeasures and the pursuit of funding from all available sources to implement those improvements. Additional fund opportunities would be led by the city as part of the overall transportation network enhancement.
Goal C-7: Promote a friendly active transportation system in Costa Mesa.	**Consistent**. The proposed project includes attractive on-site bicycle and pedestrian facilities designed to promote and improve connectivity with the citywide active transportation network.
Policy C-7.2. Plan and install new bicycle lanes on Major Arterials, where feasible and appropriate.	**Consistent.** Class I bike lanes currently exist to the north, east, and south of the project site along the southern boundary of the Costa Mesa Country Club; along Harbor Boulevard; and parallel to Tanager Drive from the Harbor Boulevard intersection to Golf Course Drive. Figure 3.15-2, *Existing and Proposed Surrounding Bicycle Network*, shows the existing and proposed bicycle network for the project site.
Policy C-7.4. Where feasible, Class I shared - use paths should be a priority for future developments.	**Consistent.** Many of the trails throughout the community are anticipated to be multiuse paths providing additional connectivity for pedestrians and cyclists. Figure 3.15-2, *Existing and Proposed Surrounding Bicycle Network*, shows the existing and proposed bicycle network for the project site.
Policy C-7.13. Prioritize safe access to major regional trails such as the OC Loop/Santa Ana River Trail and the Newport Back Bay Trail System. Where feasible, plan and provide a continuous low-stress Class I and/ or Class IV facility from east to west across the city between these facilities.	**Consistent.** Figure 3.15-2, *Existing and Proposed Surrounding Bicycle Network*, shows the existing and proposed bicycle network for the project site which would connect to the Santa Ana River Trail.
Goal C-8: Create a safer place to walk and ride a bicycle.	**Consistent**. The proposed project proposes median design features and traffic calming strategies to reduce vehicle speeds and minimize conflicts among vehicles, bicyclists, and pedestrians. Class I: Off Street Paved Bicycle Paths and/or Trails Class II: on-Street Striped and Signed Bicycle Lanes bike lanes are proposed along key roadways, a pedestrian

Table 3.15-3 Proposed Project Consistency with Costa Mesa's Circulation Element Goals and Policies

Goals and Policies	Consistency Analysis
	promenade is proposed bisecting the proposed project, and paved sidewalks would be provided along major on-site roadways.

Source: Fehr and Peers 2026a (Appendix J.1).

Conclusion

The proposed project is consistent with applicable regional and local transportation plans, including Connect SoCal 2024, the OCTA Long Range Transportation Plan, the OC Transit Master Plan, and the City of Costa Mesa's Active Transportation Plan, Local Roadway Safety Plan, Pedestrian Master Plan, and General Plan Circulation Element. The proposed project supports multimodal mobility, enhances bicycle and pedestrian connectivity, provides a secondary access point to improve safety and circulation, and incorporates complete streets and traffic calming features. Accordingly, the proposed project would not conflict with a program, plan, or ordinance, or policy addressing the circulation system. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

VMT IMPACTS

The proposed project VMT modeling and forecasting analysis shows how the VMT generated by the proposed project compares to current and forecast travel characteristics in the area.

Baseline and Cumulative VMT Impacts

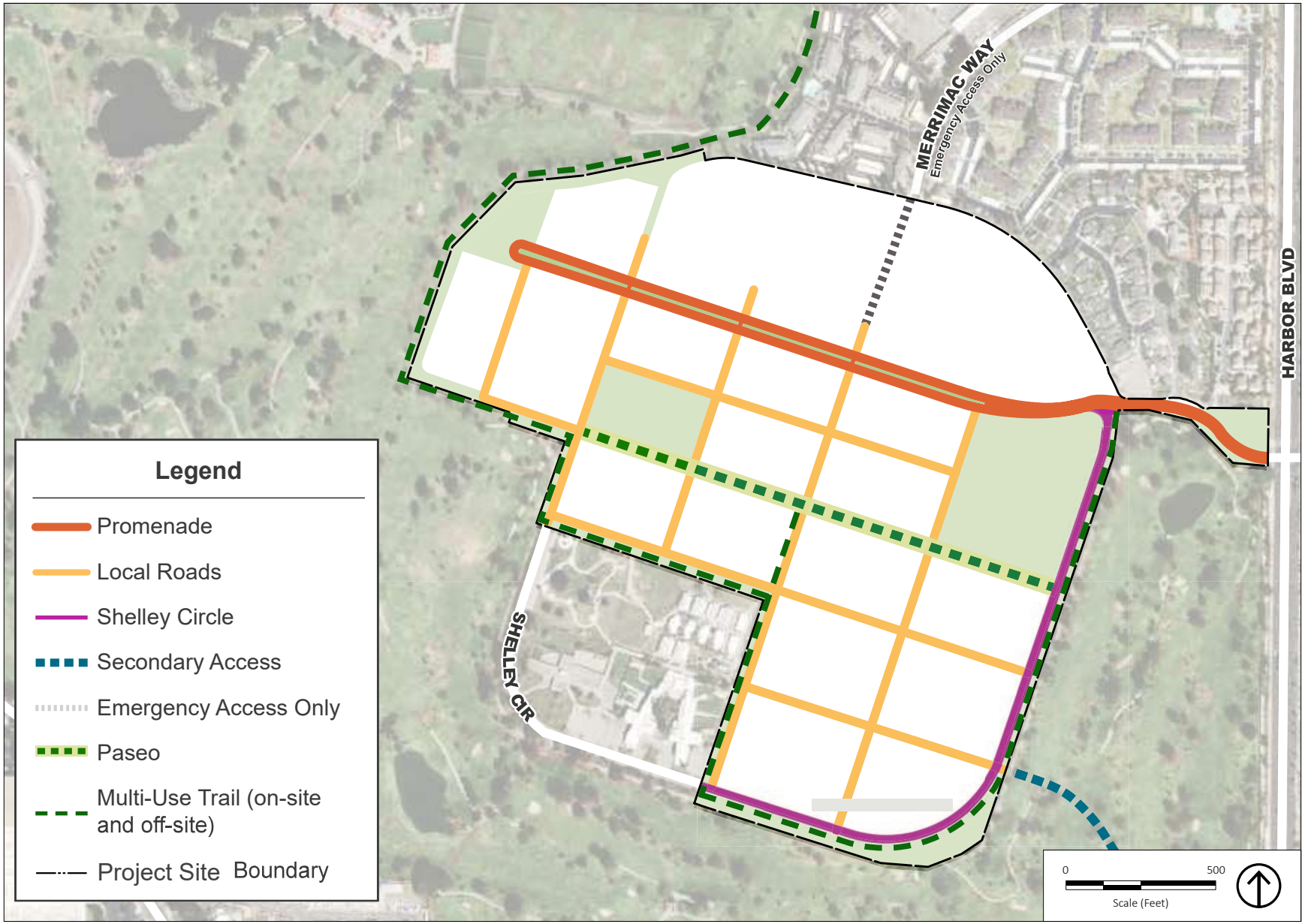
Table 3.15-4, *O-D Method VMT Forecasts and Impact Assessment*, shows the O-D VMT per service population of the proposed project, which evaluates the potential transportation impact related to the proposed project. As shown in the Table below, the proposed project is forecast to generate lower O-D VMT per service population than the draft threshold in Baseline Year 2025 and Cumulative Year 2045 conditions.

Table 3.15-4 O-D Method VMT Forecasts and Impact Assessment

Area	O-D VMT	Service Population	O-D VMT/SP
Baseline (2025)			
Proposed Project	138,120	10,000	13.8
Citywide Average	6,786,444	227,111	29.9
Threshold of Significance (15% Below Citywide VMT/SP)			25.4
VMT Exceeds Baseline Threshold?			**No**
Cumulative (2045)			
Proposed Project	139,173	10,000	13.9
Citywide Average	7,779,136	263,879	29.5
Threshold of Significance (15% Below Citywide VMT/SP)			25.1
VMT Exceeds Cumulative Threshold?			**No**

Source: Fehr and Peers 2026a (Appendix J.1).

Note: SP = Service Population; which is based on 9,926 residents and 74 employees for the proposed project.



Source: PlaceWorks 2026.

Figure 3.15-4
Proposed Roadway Network

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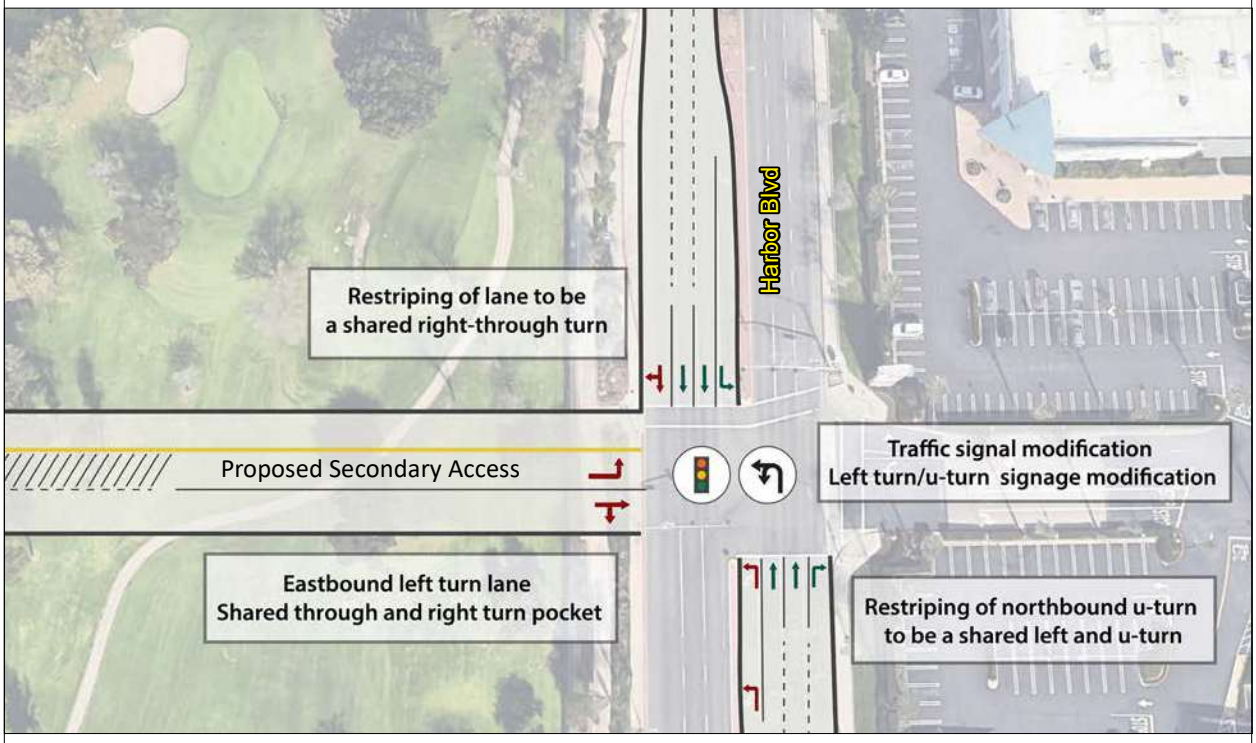
Harbor Boulevard and Fair Drive



Harbor Boulevard and Proposed Secondary Access

Source: Fehr & Peers 2026.

Figure 3.15-5
Intersection Improvements

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Net Effect on VMT Impact

The proposed project's net effect on VMT estimates are provided in Table 3.15-5, *Net Effect on VMT Forecasts and Impact Assessment*. As shown in Table 3.15-5, the VMT with the proposed project is anticipated to be increased within the City boundary. When normalized by the service population, the proposed project results in a lower VMT per service population within the City boundary.

Table 3.15-5 Net Effect on VMT Forecasts and Impact Assessment

Metric	City Boundary	
	No Project	**With Project**
Baseline Year (2025)		
Boundary VMT	4,350,607	4,394,636
Service Population	227,111	237,111
Boundary VMT/SP	19.2	18.5
Exceeds Baseline Year No Project VMT/SP Threshold?	N/A	**No**
Cumulative Year (2045)		
Boundary VMT	4,596,437	4,638,876
Service Population	263,879	273,879
Boundary VMT/SP	17.4	16.9
Exceeds Cumulative Year VMT/SP Threshold?	N/A	**No**

Source: Fehr and Peers 2026 (Appendix J.1).

Note: SP = Service Population; which is based on 9,926 residents and 74 employees for the proposed project.

Since all four scenarios did not exceed the City's O-D method and boundary method VMT thresholds, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

TRAFFIC HAZARDS

Geometric Design

The proposed project includes the planned construction of a secondary access road to serve the proposed project based on a threshold for housing development. The proposed project would be accessed via two access points along Harbor Boulevard (See Figure 3.15-4 and Figure 3.25-5). The second proposed access point at Harbor Boulevard would be extended west, through the golf course to connect to the project site. Emergency access would also be provided through Merrimac Way, which is a privately maintained road by the State. The Merrimac Way emergency access connection to the project site is anticipated to be gated when not in use. This new secondary roadway extension, intersection improvements at Fairview Drive on the northeast portion of the project site, improvements at the Harbor Boulevard/Fair Drive intersection, and improvements at the Harbor Boulevard/ Harbor Center intersection are designed to meet the City's design standards and are being developed in coordination with the Public Works Department. Implementation of the proposed project would not result in hazardous conditions, and no geometric deficiencies attributable to the project have been identified.

Queuing

As shown in Figures 3.15-2, 3.15-4, and 3.15-5, the proposed project would construct an internal circulation system to serve the project site. As described in the proposed project, the circulation network would support a safe, connected, and multimodal environment that prioritizes pedestrians and cyclists while accommodating vehicles, emergency access, and service functions. The proposed project would also include the addition of one eastbound left-turn lane at the Harbor Boulevard/Fair Drive intersection, which would improve traffic operations by reducing delays, shortening cycle lengths, decreasing the number of stopped vehicles, and minimizing individual cycle failures. The proposed project establishes development and design standards specific to the site, which would supersede Title 13, Chapter V, Development Standards, of the CMMC. The proposed project includes the following circulation-related provisions:

- Streets would be designed to accommodate all modes of travel, including pedestrians, bicycles, vehicles, and transit, where applicable.
- Street design would be consistent with the typologies identified in the proposed project.

Because the proposed project would provide an internal circulation system with adequate roadway widths, intersection controls, and site access points designed to accommodate

anticipated traffic volumes, vehicles would be able to queue within the project site without spilling back onto adjacent roadways.

Pedestrian Safety and Accessibility

As part of the proposed project, a series of roadway and off-site improvements would be implemented to support safe and efficient access. Figure 3.15-5 shows improvements at the Harbor Boulevard/Fair Drive intersection and the Harbor Boulevard/Proposed Secondary Access-Harbor Center intersection. These improvements would enhance intersection operations, improve visibility and channelization, and support safer pedestrian crossings by organizing turning movements and reducing potential vehicle conflicts. In addition, the proposed project would include eight-foot-wide sidewalks, a central paseo, and a separated multi-use trail along Shelley Circle that would allow walkability at and around the project site. Additional standards for lighting (Section 4.6.6 Lighting) and landscaping (Chapter 6, Open Space, Landscaping, & Public Art) are provided in the Specific Plan to ensure safety. In addition, the proposed improvements along Harbor Boulevard/Proposed Secondary Access-Harbor Center intersection would incorporate a golf cart crossing to enhance safety. This improvement may take the form of either one-way, at-grade crossings at two locations or a single two-way crossing that could be either at-grade or beneath the secondary access road in a tunnel. These improvements are included since the proposed project's secondary access road would traverse the existing golf course. The final placement of the golf cart crossing would ultimately be influenced by the final design of the secondary access road, and the reconfiguration plans for the golf course itself.

Incompatible Uses

As shown in Figures 2-1a through 2-1d, *Existing Site Photographs*, of Chapter 2, *Project Description*, the project site currently consists of low-rise (one-to-four story) FDC buildings interspersed with open space areas, and all on-site buildings are vacant.

In addition, the project site is designated as a Multi-Use Center (MUC) according to the Costa Mesa General Plan, allowing low- to moderate-intensity urban uses with residential densities of 6 to 40 units per acre and a maximum floor-area ratio (FAR) of 0.25 for nonresidential uses. The two-acre Fair Drive area is designated Medium Density Residential, permitting up to 12 units per acre. The zoning for the project site is Institutional & Recreational–Multi-Use (I&R-MLT), which allows 582 dwelling units with a 0.25 FAR and requires 25 percent open space. The Fair Drive portion is also zoned Planned Development Residential–High Density (PDR-HD), allowing residential development at a density of 20 or more units per acre.

The proposed project would construct and operate a mixed-use development that would exceed the City's General Plan and zoning designations. However, by providing residential, commercial, and community-serving uses, the proposed project would enhance compatibility with surrounding land uses, which include residential, commercial, educational, and SREOC

facilities (see Figure 2-4, *Local Vicinity*). The proposed project does not introduce uses that are incompatible with the surrounding area and would improve site integration compared with existing vacant conditions.

Conclusion

The proposed project does not propose geometric design features (e.g., sharp curves, unusual lane configurations) or land uses incompatible with surrounding development. Access would be provided via existing roadway connections that meet design standards. Intersections within the project site are expected to continue operating safely, and no geometric deficiencies attributable to the proposed project have been identified. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project result in inadequate emergency access?

OPERATION – EMERGENCY ACCESS

The City has reviewed and approved emergency access with representatives from Costa Mesa Fire & Rescue (CMFR). The proposed project would construct a secondary access road at an existing intersection located at Harbor Boulevard and Harbor Center, providing a dedicated emergency access route. Therefore, the proposed project would not result in inadequate emergency access. Impacts related to emergency access for the operation of the proposed project would be **less than significant.**

Significance without Mitigation: Less than significant.

CONSTRUCTION – EMERGENCY ACCESS

As shown in Figure S-9, *Public Safety Facilities and Emergency Evacuation Routes*, of the City's Safety Element, Harbor Boulevard serves as an emergency evacuation route for the City of Costa Mesa. Temporary closures on this roadway due to the proposed project's off-site improvements could interfere with emergency response and evacuations during construction. Therefore, this impact is determined to be **potentially significant.**

Significance without Mitigation: Potentially Significant.

Impact T-1: Temporary off-site construction activities on Harbor Boulevard could interfere with emergency response and evacuations.

> **Mitigation Measure T-1:** The project applicant's construction contractor shall prepare a Traffic Control Plan to ensure that alternate routes are provided and maintained during

temporary road closures or construction activities along Harbor Boulevard. The Traffic Control Plan shall detail traffic detour routes, emergency vehicle access provisions, and coordination protocols with local emergency service providers. The plan shall be submitted to the City of Costa Mesa Public Works Department, Costa Mesa Police Department, and Costa Mesa Fire & Rescue for review and approval prior to the start of construction for the roadway improvements on Harbor Boulevard.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure T-1 would ensure that emergency access and evacuation routes remain functional throughout the construction period. By requiring the identification and maintenance of alternate routes, and coordination with emergency services, the mitigation measure would prevent unanticipated delays or access barriers. As such, the potential for the construction of the proposed project to result in inadequate emergency access would be adequately addressed, and the impact would be reduced to a less-than-significant level.

3.15.5 Cumulative Impact Analysis

The cumulative study area for transportation impacts includes the City of Costa Mesa and the local roadway network providing access to and around the project site as shown in Figure 3.15-1. Cumulative projects consist of planned residential, commercial, and community developments in Costa Mesa.

Would the project have a cumulative effect related to transportation?

Program, plan, ordinance, or policy addressing the circulation system

The proposed project would not conflict with plans listed in impact discission (a), which address the circulation system, including transit, roadway, bicycle, and pedestrian infrastructure. Transportation improvements in the Costa Mesa are implemented through a coordinated planning and development process whereby individual projects are required to construct or fund improvements necessary to maintain safe and efficient circulation as growth occurs. Consistent with this framework, the proposed project would include both on-site and off-site roadway improvements that enhance connectivity and provide safe and efficient access to the proposed project. Specifically, the proposed project would improve multimodal connectivity between the project site and surrounding neighborhoods through proposed roadway, bicycle, and pedestrian network. These improvements would enhance vehicle, pedestrian, and bicycle safety and would integrate the project site into the existing and planned circulation network. By improving local access and circulation, the proposed project would support planned transportation improvements in the area and would not create conditions that would contribute to a significant cumulative impact. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

VMT

The VMT modeling and forecasting analysis for the proposed project indicates that it would generate lower O-D method and boundary method VMT per service population compared to the adopted threshold for the Cumulative Year 2045 conditions, as detailed in Table 3.15-4 and Table 3.15-5, respectively. Therefore, the proposed project does not create conditions that would contribute to a significant cumulative impact. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

Geometric Design Features

The proposed project would establish its own internal circulation system, designed specifically for the project site. The proposed project includes development and design standards that ensure roadway geometry. In addition, the off-site improvements and the proposed circulation network would enhance traffic operations and connectivity on surrounding local roadways, improving vehicle flow, pedestrian safety, and multimodal access. By providing a well-designed internal circulation system and coordinated off-site improvements, the proposed project would prevent the introduction of hazardous geometric conditions and would support safer, more efficient movement throughout the local roadway network. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

Emergency Access

Because Harbor Boulevard serves as an emergency evacuation corridor, temporary construction may disrupt access during an emergency. However, Mitigation Measure T-1 mandates maintaining emergency access, coordinating with emergency responders, and establishing alternative routes to ensure continued functionality. Construction would comply with city requirements and management practices. Similar measures would apply to future projects, protecting emergency operations during cumulative activities. With these mitigation measures in place, sufficient internal circulation, emergency access, and regional connectivity would be maintained throughout construction and long-term use, preventing significant cumulative impacts. Therefore, the proposed project would not cumulatively contribute to transportation impacts. Cumulative impacts are **less than significant**.

Significance with Mitigation: Less than significant. The proposed project and other foreseeable cumulative developments would implement similar circulation, transportation, and safety improvements, preventing any substantial adverse cumulative impacts.

3.15.6 References

Costa Mesa, City of. 2018. Active Transportation Plan. https://www.costamesaca.gov/home/showpublisheddocument/35080/636760708116130000.

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Costa Mesa. 2024. Costa Mesa Pedestrian Master Plan. https://www.costamesaca.gov/home/showpublisheddocument/57284/638548438720200000.

OCTA (Orange County Transportation Authority). 2022 Long-Range Transportation Plan. https://www.octa.net/pdf/LRTP_Directions2045_Final_noAppendix.pdf.

OCTA. 2025. 2024 OC Transit Vision. https://www.octa.net/pdf/OCTV_FullReport.pdf.

OCTA. 2026. 2026 Long-Range Transportation Plan. https://www.octa.net/programs-projects/programs/plans-and-studies/long-range-transportation-plan/overview.

SCAG (Southern California Association of Governments). 2024. Connect SoCal. https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf.

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3.16 TRIBAL CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential of the Fairview Developmental Center Specific Plan (proposed project) to impact tribal cultural resources in the City of Costa Mesa. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary.

Notice of Preparation Comments

The City received two comment letters on the Notice of Preparation (NOP) regarding tribal cultural resources. A letter from the Native American Heritage Commission on October 30, 2025, summarized requirements under Assembly Bill (AB) 52 and Senate Bill (SB) 18. A letter from Costa Mesa First on December 5, 2025, requests that the DEIR identify tribal cultural resources that will be considered in the analysis and provide appropriate mitigation. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introduction*, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the complete comment letters.

3.16.1 Regulatory Framework

FEDERAL

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (United States Code, Title 16, Sections 470aa–mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Native American lands.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (United States Code, Title 25, Sections 3001 et seq.) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants and culturally affiliated Indian tribes.

National Historic Preservation Act

The National Historic Preservation Act supplements the provisions of the Antiquities Act of 1906 and established laws for historic resources to “preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of individual choice.” The law makes it illegal to destroy, excavate, or remove from federal or Indian lands any archaeological resources without a permit

from the land manager. Regulations for the ultimate disposition of materials recovered as a result of permitted activities state that archaeological resources excavated on public lands remain the property of the United States. Archaeological resources excavated from Indian lands remain the property of the Indian or Indian tribe having rights of ownership over such resources.

National Register of Historic Places

The National Register of Historic Places (NRHP) recognizes properties that are significant at the national, state, and/or local levels and includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Properties are nominated to the NRHP by the State Historic Preservation Officer of the state in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

The criteria for listing in the NRHP follow the standards for determining if properties, sites, districts, structures, or landscapes of potential significance are eligible for nomination. Properties nominated must meet any or all of the following criteria and must also possess integrity of location, design, setting, feeling, workmanship, association, and materials.

- Associated with events that have made a significant contribution to the broad patterns of history.
- Associated with the lives of persons significant in our past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Yield, or may be likely to yield, information important in prehistory or history.

STATE

Assembly Bill 52

The Native American Historic Resource Protection Act, AB 52, took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to tribal cultural resources (TCR) into the CEQA process. It requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. Projects that require a notice of preparation of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration are subject to AB 52. A significant impact on a TCR is considered a significant environmental impact and requires feasible mitigation measures.

Tribal cultural resources must have certain characteristics:

1. Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. (Public Resources Code [PRC] Section 21074(a)(1))
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (PRC Section 21074[a][2])

The first category requires that the tribal cultural resource qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it supports its determination with substantial evidence and consider the resource's significance to a California tribe. Following is a brief outline of the process, paraphrased from PRC Sections 21080.3.1 and 21080.3.2.

1. A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing.
2. Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.
3. A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
4. The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
5. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource, OR a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.

Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on tribal cultural resources and discuss feasible alternatives or mitigation that avoid or lessen the impact.

PRC Section 21082.3(c)(1) states that any information, including the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any

information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. However, confidentiality does not apply to data or information that are, or become, publicly available; are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe; are independently developed by the project applicant or the project applicant's agents; or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.

Senate Bill 18

Existing law provides limited protection for Native American prehistoric, archaeological, cultural, spiritual, and ceremonial places. These places may include sanctified cemeteries, religious sites, ceremonial sites, shrines, burial grounds, prehistoric ruins, archaeological or historic sites, Native American rock art inscriptions, or features of Native American historic, cultural, and sacred sites.

SB 18 was signed into law in September 2004 and went into effect on March 1, 2005. It placed new requirements upon local governments for developments within or near "traditional tribal cultural places" (TTCP). Per SB 18, the law requires local jurisdictions to provide opportunities for involvement of California Native American tribes in the land planning process for the purpose of preserving traditional tribal cultural places. The Office of Land Use and Climate Innovation's Tribal Consultation Guidelines, adopted on November 14, 2005, provides advisory guidance to cities and counties on the process for consulting with Native American tribes during the adoption or amendment of local general plans or specific plans. The Tribal Consultation Guidelines recommend that the Native American Heritage Commission (NAHC) provide written information as soon as possible but no later than 30 days after receiving a request to inform the lead agency if the proposed project is determined to be in proximity to a TTCP and another 90 days for tribes to respond to notices provided by local governments if they want to consult to determine whether the project would have an adverse impact on the TTCP. There is no statutory limit on the consultation duration. Prior to the adoption or amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located in the city or county's jurisdiction; the referral must allow a 45-day comment period. The CEQA public distribution list shall include tribes provided by the NAHC. If the NAHC, the tribe, and interested parties agree upon the mitigation measures necessary for the proposed project, they would be included the environmental document of a project (PRC Sections 5097.9–5097.991).

Archaeological resources are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code. In addition, cultural resources are recognized as a nonrenewable resource and therefore receive protection under the California PRC and CEQA.

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources, and sacred sites and identifies the powers and duties of the NAHC.

PRC Sections 5097.9 to 5097.991 also require notification to descendants of discoveries of Native American human remains and provide for treatment and disposition of human remains and associated grave goods.

California Public Resources Code Sections 21073 and 20174

PRC Section 21073 defines a "California Native American tribe" as a Native American tribe located in California that is on the contact list maintained by the NAHC.

Section 21074 defines TCRs as sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either included in or determined to be eligible for inclusion in the CRHR, or are included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or are a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

California Health and Safety Code

California Health and Safety Code Section 7050.5 requires that if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

California Register of Historical Resources

The California Register of Historic Resources (CRHR) is the state version of the NRHP program. It was enacted in 1992 and became official on January 1, 1993. The CRHR was established to serve as an authoritative guide to the state's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to PRC Section 5024.1(c), a resource may be listed as a historical resource in the CRHR if it meets any of the four NRHP criteria.

California State Historical Landmarks

California Historical Landmarks (CHLs) are buildings, structures, sites, or places that have been determined to have statewide historical significance by meeting at least one of the criteria listed below:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Associated with an individual or group having a profound influence on the history of California.
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best-surviving work in a region of a pioneer architect, designer, or master builder.

The resource also must have written consent of the property owner; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks.

California State Points of Historical Interest

California Points of Historical Interest (CPHI) are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (City or County).
- Associated with an individual or group having a profound influence on the history of the local area.
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

LOCAL

City of Costa Mesa Local Register Designation Criteria

The City of Costa Mesa's Local Register of Historic Places identifies and protects cultural resources that reflect the city's historical, architectural, and cultural development. Under Costa Mesa Municipal Code Section 13-200.9, Historic preservation procedures, resources generally 50 years of age or older may be designated if they meet National Register criteria or locally defined standards that consider historical associations, architectural merit, cultural importance, and integrity.

> The city council, upon the recommendation of the planning commission (or other commission/committee designated by the city council), may designate any building, structure, site, object, district, improvement, or natural feature that is over 50 years of age or, in special circumstances under 50 years, as a local landmark if it meets the criteria for listing in the National Register of Historic Places, or the criteria listed below. Any structure identified in the city's general plan is recognized as being eligible for placement on the local Register. Designation criteria shall include the following:
>
> When the resource:
>
> A. Exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history; or
> B. Is identified with persons or events significant in local, state, or national history; or
> C. Embodies distinctive characteristics of a style, type, period, or method of construction; or
> D. Is a valuable example of the use of indigenous materials or craftsmanship; or
> E. Represents the work of a notable builder, designer, or architect; or
> F. Contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or
> G. Has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community or of the city; or
> H. Embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation; or

I. Is similar to other distinctive properties, sites, areas, or objects based on a historic, cultural, or architectural motif; or

J. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning; or

K. Is a type of building or is associated with a business or use which was once common but is now rare; or

L. Yields, or may yield, information important in prehistory or history; and retains the integrity of those characteristics necessary to convey its significance.

City of Costa Mesa General Plan

The Historical and Cultural Element of the General Plan includes the following policies related to cultural resources within the city.

- **Policy HCR-1.4.** Require, as part of the environmental review procedure, an evaluation of the significance of paleontological, archaeological, and historical resources, and the impact of proposed development on those resources.
- **Policy HCR-1.7.** Require cultural resources studies (i.e, archaeological and historical investigations) for all applicable discretionary projects, in accordance with CEQA regulations. The studies should identify cultural resources (i.e., prehistorical sites, historical sites, and isolated artifacts and features) in the project area, determine their eligibility for inclusion in the California Register of Historical Resources, and provide mitigation measures for any resources in the project area that cannot be avoided. Cultural resources studies shall be completed by a professional archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in prehistorical or historical archaeology.

City of Costa Mesa Municipal Code (Article 14, Historic Preservation)

Municipal Code Title 13, Chapter IX, Article 14, Historic Preservation, is intended to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, sites, districts, neighborhoods, natural features, and significant permanent landscaping having special historical, archaeological, cultural, architectural, or community value in the City. Pursuant to Article 14, no person, owner, or other entity shall restore, rehabilitate, alter, develop, construct, demolish, remove, or change the appearance of any cultural resource on the local Register of Historic Places without first having applied for and been granted a certificate of appropriateness to do so by the planning commission (or other commission/committee designated by the City council).

3.16.2 Existing Conditions

REGIONAL PRE-CONTACT HISTORY

Paleo-Indian Period/Terminal Pleistocene (12,000 to 10,000 years before present [BP])

The first inhabitants of southern California were big-game hunters and gatherers exploiting extinct species of Pleistocene megafauna (e.g., mammoth and other Rancholabrean fauna). Local "fluted point" assemblages comprised of large spear points or knives are stylistically and technologically similar to the Clovis Paleo-Indian cultural tradition dated to this period elsewhere in North America. Archaeological evidence for this period in southern California is limited to a few small temporary camps with fluted points found around late Pleistocene lake margins in the Mojave Desert and around Tulare Lake in the southern San Joaquin Valley. Single points are reported from Ocotillo Wells and Cuyamaca Pass in eastern San Diego County and from the Yuha Desert in Imperial County.

Early Archaic Period/Early Holocene (10,000 to 8,500 BP)

Approximately 10,000 years ago, at the beginning of the Holocene, warming temperatures and the extinction of the megafauna resulted in changing subsistence strategies with an emphasis on hunting smaller game and increasing reliance on plant gathering. Previously, Early Holocene sites were represented by only a few sites and isolates from the Lake Mojave and San Dieguito complexes found along former lakebeds and grasslands of the Mojave Desert and in inland San Diego County. More recently, southern California Early Holocene sites have been found along the Santa Barbara Channel, in western Riverside County, and along the San Diego County coast.

Encinitas Tradition or Milling Stone Period/Middle Holocene (8,500 to 1,250 BP)

The Encinitas Tradition, formerly known as the Milling Stone Period, refers to a period of time during which small mobile bands of people who spoke an early Hokan language foraged for a wide variety of resources, including hard seeds, berries, and roots/tubers (yucca in inland areas); rabbits and other small animals; and shellfish and fish in coastal areas. Sites from the Encinitas Tradition consist of residential bases and resource acquisition locations with no evidence for overnight habitation. Residential bases have hearths and fire-affected rock indicating overnight habitation and food preparation. Residential bases along the coast have large amounts of shell and are often termed shell middens.

The Encinitas Tradition was initially relevant to non-desert regions of southern California and later segmented into the Topanga and Greven Knoll Patterns. The Topanga Pattern encompasses the Los Angeles Basin and Orange County, and the Greven Knoll Pattern covers southwestern San Bernardino County and western Riverside County. Each pattern consists of three temporal phases: Topanga I (8,500 to 5,000 years BP), Topanga II (5,000 to 3,500 BP), concluding around

3,500 BP with the arrival of Takic speakers, but continuing until about 2,000 BP in the Santa Monica Mountains.

Topanga I is characterized by abundant manos and metates, core tools, scarpers (see Appendix D.1). These artifacts gradually decrease in number through Topanga II and III. Projectile points decrease in size by Topanga II, and mortars and pestles are adopted. By Topanga III, manos, metates, mortars, and pestles increase in abundance. A wider variety of small projectile points are found as well as stone-lined earthen ovens.

Palomar Tradition (1,250 to 150 BP)

The ancestors of the Gabrielino (Tongva) moved into the Los Angeles Basin from the southern San Joaquin Valley about 3,500 BP, replacing the native Hokan speakers. Speakers of proto-Gabrielino reached the southern Channel Islands by 3,200 BP and moved as far south as Aliso Creek in Orange County by 3,000 BP.

The material culture of the inland areas where Takic languages were spoken at the time of Spanish contact is part of the Palomar Tradition (ECORP 2026). Two patterns are associated with the Palomar Tradition, the San Luis Rey and Peninsular. The San Luis Rey Phase I (1,000 to 500 BP) and San Luis Rey Phase II (500 to 150 BP) pertain to the area occupied by the Gabrielino at the time of Spanish contact. The Peninsular I (1,000 to 750 BP), II (750 to 300 BP), and III (300 to 150 BP) Phases are used in the areas occupied by the Cahuilla and Serrano, east of the project area.

San Luis Rey Phases I and II extended from the southern border of Orange County to the northern portion of San Diego County. The San Luis Rey Phase I is characterized by Cottonwood Triangular arrow points, use of bedrock mortars, stone pendants, shell beads, quartz crystals, and bone tools. San Luis Rey II is characterized by the addition of ceramics, including ceramic cremation urns, red pictographs on boulders in village sites, and steatite arrow straighteners. During San Luis Rey I there were a series of small permanent residential bases at water sources, each occupied by a kin group (probably a lineage). During San Luis Rey II people from several related residential bases moved into a large village located at the most reliable water source. Each village had a territory that included acorn harvesting camps at higher elevations. Villages contained numerous bedrock mortars, large dense midden areas with a full range of flaked and ground stone tools, rock art, and a cemetery.

ETHNOHISTORY

Ethnographic accounts of Native Americans indicate that the Gabrielino (also known as Gabrieleño, or Tongva) once occupied the region that encompasses the project area. At the time of contact with Europeans, the Gabrielino were the main occupants of the southern Channel Islands, the Los Angeles Basin, and much of Orange County and extended as far east as the

western San Bernardino Valley. The term "Gabrielino" came from the group's association with Mission San Gabriel Arcángel, established in 1771.

The Gabrielino are believed to have been one of the most populous and wealthy Native American tribes in southern California prior to European contact and spoke a Takic language. The Takic group of languages is a subgroup of the Uto-Aztecan language family.

The Gabrielino occupied villages along rivers and at the mouths of canyons. Populations ranged from 50 to 200 inhabitants. Residential structures within the villages were domed, circular, and made from thatched tule or other available wood. Gabrielino society was organized by kinship groups, with each group composed of several related families who together owned hunting and gathering territories. Settlement patterns varied according to the availability of floral and faunal resources.

Vegetal staples consisted of acorns, chia, seeds, piñon nuts, sage, cacti, roots, and bulbs. Animals hunted included deer, antelope, coyote, rabbits, squirrels, rodents, birds, and snakes. The Gabrielino also fished and collected marine shellfish.

By the late 18th century, the Gabrielino population had significantly dwindled due to introduced European diseases and dietary deficiencies, and communities disintegrated as families were taken to the missions. Recently, Gabrielino culture has undergone a resurgence, and current descendants are actively preserving their heritage.

COSTA MESA HISTORY

From 1848 to about 1880, the Santiago de Santa Ana grant was divided informally among the Yorba and Peralta heirs who continued to use the land for cattle ranching, vineyards, and other agricultural uses. Upon Teodocio Yorba's death in 1863, the ranch buildings and land at Old Santa Ana were conveyed to his daughter and son-in-law, Desiderio Burruel. The Santiago de Santa Ana grant was legally partitioned among the Yorba and Peralta descendants and other claimants in 1868. The land grant was divided into over 1,000 parcels of land. Many of the heirs sold their parcels, which resulted in much of the rancho passing out of the ownership of the Yorba and Peralta families. The towns of Orange, Tustin, and Santa Ana were established on some of these parcels in the early 1870s.

South of Santa Ana most of the former rancho land remained agricultural through the first half of the twentieth century. The small communities of Fairview, Newport, and Thurin had developed by 1900 to provide services for the rural households. Thurin was a stop on the Santa Ana & Newport Railroad, built by the McFadden Brothers in 1891 to connect their lumber business in Santa Ana with their Newport pier. The Santa Ana & Newport Railroad was purchased by the Southern Pacific Railroad in 1899.

The townsite of Harper was laid out along the railroad south of Thurin in 1910 (near what is now 19th Street and Newport Boulevard). It was named for a local farmer who had requested the siding at that location. Primarily a farming community, residents of Harper grew mainly sweet potatoes, corn, tomatoes, strawberries, and apples. By 1920, more businesses began to move to the community. In May of 1920, the community of Harper was officially renamed Costa Mesa. Although development in Costa Mesa paused during the Great Depression, it increased again by the 1940s. During the years after World War II most of the agricultural land in Costa Mesa was developed for residential and commercial use.

Costa Mesa was incorporated as a city in 1953. It included the previously separate communities of Costa Mesa, Thurin, Fairview, and Newport. By the end of the twentieth century, the city had developed into a major commercial and industrial center of Orange County. In 1999, it adopted the slogan "The City of the Arts," because it is home to multiple theaters and concert halls.

NATIVE AMERICAN HERITAGE COMMISSION

As part of an Archaeological and Built Environment Resources Inventory Report, ECORP contacted the NAHC on December 9, 2025, to request a search of the Sacred Lands File (SLF) for the project site. This search determines whether the California Native American tribes within the project site have recorded Sacred Lands in the SLF, which is populated by members of the Native American community with knowledge about the locations of tribal cultural resources (TCR). NAHC returned a positive result, which indicates that sacred lands are in the NAHC search radius.

BUILT ENVIRONMENT INVENTORY EVALUATION

Fairview Developmental Center

The 39 buildings and structures on the FDC project site were evaluated to determine if they meet the criteria for to be listed in the NRHP or CRHR. In addition, the FDC and any individual buildings were evaluated to determine if they met the criteria to be considered a California Historical Landmark.

The Fairview State Hospital Historic District (Historic District) is historically significant as a cohesive and distinguishable entity whose components, while generally lacking individual distinction, collectively represent an important concentration of buildings, structures, objects, and landscape features unified by a common plan, purpose, and physical development. The period of significance extends from 1952, when construction began, to 1969, the onset of the deinstitutionalization era. The Historic District is significant at the local level for its role in the evolution of public institutional mental health care (NRHP/CRHR Criteria A/1) and at the state level as a representative example of a post–World War II state hospital campus (NRHP/CRHR Criteria C/3).

Of the 39 buildings and structures within the FDC, 36 contribute to the eligibility of the Historic District and are considered culturally sensitive resources. In addition, contributing landscape features and outdoor spaces are integral to the Historic District and are also considered culturally sensitive. However, neither the FDC as a whole nor any individual building or feature meets the criteria for designation as a California Historical Landmark.

Costa Mesa County Club (Mesa Linda Golf Course)

NRHP and CRHP

The Costa Mesa County Club Golf Course was evaluated as a historic landscape with buildings and landscape features for both the NRHP and the CRHR. The Costa Mesa County Club Golf Course, completed in 1967, was part of the Costa Mesa Country Club and primarily intended for local recreation. However, it lacks individual significance under the NRHP and CRHR Criteria A/1 because it is not linked to notable historical events or broader historical patterns in Orange County. Under NRHP/CRHR Criteria B/2, the course does not exhibit ties to significant historical figures because archival research shows no associations with prominent individuals at local, state, or national levels. No significant golfers or owners are linked to the course's historical narrative, diminishing its relevance in this context. Regarding NRHP/CRHR Criteria C/3, although it was designed by renowned golf course architect William F. Bell, the Costa Mesa County Club Golf Course does not display his signature design elements or the artistic innovations that characterize his works. Despite featuring standard golf course components and integration with the environment, it remains a modest example and lacks the distinctive traits seen in Bell's other recognized designs. Finally, in the context of NRHP/CRHR Criteria D/4, the Costa Mesa County Club Golf Course does not hold the potential to yield historically significant information because existing archival research is complete and well established. Consequently, the course is deemed ineligible for listing under all four criteria assessed. A full evaluation of the Costa Mesa County Club Golf Course to the NRHP and the CRHR requirements can be found in Appendix D.1.

City of Costa Mesa Local Register Designation Criteria

ECORP evaluates the Costa Mesa County Club Golf Course against the designation criteria for the City of Costa Mesa's local register, which provides a comprehensive framework to evaluate properties based on their historical, cultural, and architectural significance. As substantiated in Table 3.4-1, *City of Costa Mesa Local Register Designation Criteria: Mesa Linda Golf Course*, of this DEIR, the Costa Mesa County Club Golf Course has been determined not to qualify as a historical resource under applicable local criteria.

3.16.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to recreation if it would:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

   ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

METHODOLOGY

Sacred Lands File Search

A SLF request was submitted to the NAHC to in inquire about the presence/absence of sacred or religious sites in the vicinity of the project site. The NAHC's SLF returned a positive result, which indicates that sacred lands are located within the NAHC search radius.

SCCIC Records Search

A records search for the project area was conducted at the South Central Coastal Information Center (SCCIC) of the CHRIS at California State University, Fullerton, on November 24, 2025. The purpose of the records search is to determine the extent of previous surveys within a one-mile (1600-meter) radius of the project area, in addition to whether previously documented pre-contact or historic archaeological sites, architectural resources, or traditional cultural properties exist within the project area.

Archival Records Review

In addition, a review of archaeological records and historical references pertinent to Orange County was conducted. Documents included the Built Environment Resource Directory (BERD), National Register Information System, California Historical Landmarks, various Caltrans surveys, and others. Historical maps were also examined dating from 1890 to 1981, including multiple editions of USGS Santa Ana and Newport Beach quadrangles. Historical aerial photographs from 1938 to 1992 were also analyzed to assess the project area usage and changes in the built environment. The Costa Mesa Register of Historic Places is situated about one mile south of the project area. Appendix D.1 lists all references and databases reviewed under the records search.

An archival records search focusing on the Costa Mesa Country Club property was conducted. On January 8, 2025, digitized building permit records were requested from the City of Costa Mesa Building Safety Division and received on January 13, 2025. The available permits were limited to interior renovations and cellular antenna installations; no original construction permits were provided. In addition, the digital collections of the Costa Mesa Public Library were reviewed, including historical articles, photographs, and documents relevant to the property, which were used to inform the historical context and significance evaluation. Historical newspapers from Costa Mesa and surrounding communities were also examined to better understand the city's development and the history of the Costa Mesa Country Club property. Finally, on November 15, 2025, data from the Orange County Assessor files were reviewed to confirm construction dates and current ownership of the golf course.

Historical Society Correspondence

Letters were sent to the Orange County Historical Society and Costa Mesa Historical Society on December 9, 2025, seeking comments or historical information relevant to the project site. As of this document's preparation, there has been no response from the Orange County Historical Society; the Costa Mesa Historical Society acknowledged receipt of the letter on December 10, 2025, but did not provide additional information.

Pedestrian Survey

An intensive pedestrian survey of the FDC on October 13, 2023, and of Shelley Circle Trail and the Costa Mesa County Club Golf Course on November 19, 2025, used 15-meter transects. Figure 3.4-1, *Survey Coverage*, shows the total area covered by the field study.

Area of Potential Effects

As shown in Figure 3.4-1, *Survey Coverage*, the area of potential effects (APE) consists of the horizontal and vertical limits of a project and includes the area within which significant impacts or adverse effects to Historical Resources or Historic Properties could occur as a result of the proposed project. The APE is defined for projects subject to regulations implementing Section 106 (federal law and regulations).

The horizontal APE consists of all areas where activities associated with a project are proposed. This includes areas proposed for construction, vegetation removal, grading, trenching, stockpiling, staging, paving, and other elements. The horizontal APE is illustrated in Figure 3.4-1.

The vertical APE is described as the maximum depth below the surface to which excavations for project foundations and facilities will extend. Therefore, the vertical APE includes all subsurface areas where archaeological deposits could be affected. The subsurface vertical APE varies across the project area but could extend as deep as 20 feet below the current surface; therefore, a review of geologic and soils maps was necessary to determine the potential for buried archaeological sites that cannot be seen on the surface. The vertical APE also is described as the maximum height of structures that could affect the physical integrity and integrity of setting of cultural resources, including districts and traditional cultural properties. For the proposed project, the above-surface vertical APE is assumed to be as high as 120 feet above the current surface.

Tribal Consultation

The City requested a NAHC contact list. The NAHC Contact List is used to determine which tribes meet the statutory definition of a “California Native American Tribe” and are eligible to engage in consultation for purposes of SB 18 (tribal consultation in land use planning) and AB 52 (CEQA tribal consultation); and which tribes meet the definition of “California Indian Tribe” for the purposes of AB 27. The City sent formal requests to initiate the tribal consultation process with California Native American tribes traditionally and culturally affiliated with the project site in accordance with statutory requirements on October 28, 2025.The City received formal requests to conduct tribal consultation with the Juaneño Band of Mission Indians Acjachemen Nation 84-A, Juaneño Band of Mission Indians Acjachemen Nation- Belardes, and Gabrieleño Band of Mission Indians–Kizh Nation. Consultation subsequently occurred pursuant to AB 52 and SB 18. The City concluded the formal consultation process with the Juaneno Band of Mission Indians Acjachemen Nation-84-A on February 19, 2026, the Gabrieleno Band of Mission Indians-Kizh Nation on March 5, 2026, and the Juaneno Bando of Mission Indians Acjachemen Nation-Belardes on March 17, 2026.

3.16.4 Project Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

The FDC is considered eligible for listing in the NRHP and the CRHR under Criteria A/1 and C/3. The Historic District is significant at the local level for its role in the evolution of public institutional mental health care (NRHP/CRHR Criteria A/1) and at the state level as a representative example of a post–World War II state hospital campus (NRHP/CRHR Criteria C/3). Of the 39 buildings and structures within the FDC, 36 contribute to the eligibility of the Historic District and are considered culturally sensitive resources. In addition, the FDC as a whole or any individual building does not meet the criteria for designation as a California Historical Landmark.

However, the FDC Historic District is not considered a TCR as defined in Public Resources Code Section 21074. As discussed above, the FDC's historical significance eligibility revolves around its role in the evolution of public institutional mental health care, and as a post–World War II state hospital campus, and does not have tribal cultural and/or spiritual significance to California Native American tribes based on the consultation process.

The Costa Mesa County Club Golf Course was evaluated as a historic landscape with buildings and landscape features for the NRHP, CRHR, and the City of Costa Mesa Local Register Designation Criteria. Information found during a search of the SCCIC, and archival records, Historical Society Correspondence, and a pedestrian survey, assisted in the evaluation of the Costa Mesa County Club Golf Course against all four criteria for NRHP, and CRHR. Information obtained through a records search at the SCCIC, review of archival materials and Historical Society correspondence, and a pedestrian field survey was used to evaluate the Costa Mesa County Club Golf Course for eligibility under all four criteria of the NRHP and the CRHR. The course is deemed ineligible for listing under all four criteria assessed. Additionally, the Costa Mesa County Club Golf Course has been determined not to qualify as a historical resource under applicable local criteria (see Appendix D.1). Therefore, **no impact** would occur.

Significance without Mitigation: No impact

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Sacred Lands File Search

A SLF request was submitted to the NAHC to inquire about the presence/absence of sacred or religious sites in the vicinity of the project site. The NAHC's SLF returned a positive result, which indicates that sacred lands are located within the NAHC search radius.[1]

SB 18 and AB 52 Consultation

In accordance with SB 18 and AB 52, the City notified tribes identified by the NAHC and on the City's Tribal Consultation list about the proposed project on October 23, 2025, to determine the potential for tribal cultural resources on-site and to determine if local knowledge of TCRs is available about the project site and surrounding area. The following tribes responded and requested consultation pursuant to AB 52 and SB 18:

- **Juaneño Band of Mission Indians Acjachemen Nation 84-A**. The Juaneño Band of Mission Indians requested consultation with the City pursuant to AB 52. The City and Juaneño Band of Mission Indians consulted virtually and via email. The City and the Juaneño Band of Mission Indians coordinated on the language for Mitigation Measures TCR-1, TCR-2, and TCR-3.
- **Juaneño Band of Mission Indians Acjachemen Nation- Belardes**. The Juaneño Band of Mission Indians requested consultation with the City pursuant to AB 52. The City and Juaneño Band of Mission Indians consulted virtually and via email. The Juaneño Band of Mission Indians coordinated on the language for Mitigation Measures TCR-1, TCR-2, and TCR-3.
- **Gabrieleño Band of Mission Indians–Kizh Nation.** The Gabrieleño Band of Mission Indians–Kizh Nation requested consultation with the City pursuant to AB 52. The City and Kizh Nation

[1] If a SLF search reveals a positive result for sacred lands and the potential of a native American cultural resource is in a project area, the NAHC does not provide the name or location of the sites. Instead, the NAHC provides the requesting party a list of the California Native American Tribes on its AB 52/SB 18 Tribal Consultation Lists that are traditionally and culturally affiliated to the project area so that the CEQA lead agency may consult with the Tribes to discuss avoidance, preservation in place, or mitigation of impacts to any Native American cultural resources in a project area.

consulted via email. The Gabrieleño Band of Mission Indians–Kizh Nation coordinated on the language for Mitigation Measures TCR-1, TCR-2, and TCR-3.

The City concluded the formal consultation process with the Juaneno Band of Mission Indians Acjachemen Nation-84-A on February 19, 2026, the Gabrieleno Band of Mission Indians-Kizh Nation on March 5, 2026, and the Juaneno Bando of Mission Indians Acjachemen Nation-Belardes on March 17, 2026.

Although the project site and surrounding area have previously been developed and disturbed, the potential to uncover tribal cultural resources at the project site exists based on the records search and tribal consultation. In addition, because the proposed project would require utility trenching and other ground-disturbing activities for construction, there is potential to uncover TCRs during ground-disturbing activities.

Ground-disturbing activities, such as utility trenching and grading, may encounter undisturbed native soils, and it is possible that subsurface TCRs could be discovered. The disturbance of these TCRs could cause a substantial adverse change which would be considered **potentially significant**.

Significance without Mitigation: Potentially significant

Impact TCR-1: Implementation of the proposed project could result in an substantial adverse change to unknown TCRs during ground-disturbing activities.

Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

a) Prior to the commencement of any ground disturbing activity at the project site, the Project Applicant shall retain a Native American Monitor, approved by the tribes that consulted on this project pursuant to Assembly Bill AB52 and Senate Bill SB18 (the "Tribe" or the "Consulting Tribe"), which includes the Juaneño Band of Mission Indians – Acjachemen Nation Belardes, Juaneño Band of Mission Indians – Acjachemen Nation 84A, and Gabrieleño Band of Mission Indians – Kizh Nation, and in concurrence with the City of Costa Mesa (City) as the CEQA lead agency. The Project Applicant shall coordinate with the Consulting Tribes to develop an executed contract to pay for a tribal monitor to be present during ground-disturbing activities. Prior to the issuance of any permit necessary to commence a ground-disturbing activity, a copy of the executed contract shall be submitted to the City of Costa Mesa Economic and Development Services Department.

b) The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required

in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition and removal of building foundations, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

c) The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered tribal cultural resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc. as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the City upon written request to the Tribe.

On-site monitoring shall conclude upon either (1) written confirmation to the Consulting Tribes from a designated point of contact for the City that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Consulting Tribes that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact TCRs.

Mitigation Measure TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-funerary/Non-ceremonial)

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 100 feet) and shall not resume until the discovered TCR has been fully assessed by the designated tribal monitor and qualified archaeologist (see Mitigation Measures CUL-4). The City and Consulting Tribes shall be notified and all TCRs shall be recovered and retained in the form and/or manner the Consulting Tribes deem appropriate, in the Consulting Tribes' discretion, and for any purpose the Consulting Tribes deems appropriate, including for educational, cultural, and/or historic purposes.

Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

Native American human remains are defined in Public Resource Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal

completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, shall be treated according to this statute.

a) If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

b) Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

c) If human remains are discovered, the designated qualified archaeologist (see Mitigation Measures CUL-5) shall notify the Consulting Tribes, the City, and the Orange County Coroner. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the California Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the proposed project. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains.

d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

e) If preservation in place is not feasible, the MLD shall recommend treatment measures for rebury where remains will not be further disturbed. This shall also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located.

f) Work may not resume within the no work radius until the City, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measures (MMs) TCR-1, TCR-2, and TCR-3 would provide native American monitoring and archeological monitoring prior to ground-disturbing activities, and procedures upon the discovery of tribal cultural resources. Compliance with federal, State, and local regulations and implementation of MMs TCR-1, TCR-2, and TCR-3 would ensure that impacts associated with TCRs are less than significant.

3.16.5 Cumulative Impact Analysis

The cumulative setting for tribal cultural resources includes the City of Costa Mesa where ongoing and future urban development may result in ground disturbance. Such activities collectively increase the potential to damage or destroy unknown tribal cultural resources.

Would the project have a cumulative effect related to tribal cultural resources?

Cumulative impacts to TCRs would occur when the impacts of the proposed project, in conjunction with other projects and development in the City, result in multiple and/or cumulative impacts to TCRs in the area. The SLF identified a positive result, which indicates that sacred lands are located within the NAHC search radius. Future development within the surrounding area may result in a positive result and would involve a degree of earthwork, and therefore would contribute to a regionwide cumulative risk to TCRs. Similar to the proposed project, other development projects would involve grading, excavation, utility trenching, and other earthwork that could inadvertently uncover previously unknown TCRs. As with the proposed project, each related cumulative project would be required to comply with SB 18, AB 52, and PRC Section 21083.2(i), which addresses tribal consultation and accidental discoveries of archaeological sites and resources, including tribal cultural resources.

As discussed above, the proposed project incorporates Mitigation Measures TCR-1, TCR-2, and TCR-3 to ensure that any unanticipated finds are properly identified, evaluated, and protected in compliance with federal, State, and local policies. Future projects would incorporate project specific mitigation measures to ensure impacts to TCRs are limited. With these mitigation measures in place, the proposed project's incremental contribution to cumulative cultural-resource impacts would be **less than significant with mitigation**, and the proposed project's impacts would not be cumulatively considerable.

Significance with Mitigation: Less than significant.

3.17 UTILITIES AND SERVICE SYSTEMS

This section of the DEIR evaluates the potential utilities and service systems impacts associated with the Fairview Developmental Center Specific Plan (proposed project). This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential utilities and service systems impacts, and identifies feasible mitigation measures, if required, that could mitigate any potentially significant impacts.

This includes impacts on utilities and service systems, including water supply and demand, wastewater (sewage) conveyance and treatment, solid waste collection and disposal systems, storm drainage systems, and other utilities. Impacts to hydrology (e.g., flooding) and water quality can be found in Section 3.10, *Hydrology and Water Quality*. The regulatory framework and existing conditions for electricity and natural gas facilities can be found in Section 3.6, *Energy*.

The analysis in this section is based, in part, on the following source(s):

- *Proposed Conditions Infrastructure Report For Sewer And Drainage*, Fuscoe Engineering, Inc., February 2026 (DEIR Appendix K.1)
- *Dry Utility Summary Memo,* E4 Utility Design, March 4, 2026 (DEIR Appendix K.2)
- *Water Supply Assessment,* West & Associates Engineering Inc., March 2026 (DEIR Appendix G.1)

Notice of Preparation Public Comments

The City received a letter from Wendy Leece on December 5, 2025, and Costa Mesa First on December 12, 2025, for the Notice of Preparation (NOP). The comment letters ask if dry utilities would be underground and request that the DEIR analyze utility and solid waste impacts for the proposed project. The relevant utilities and service systems issues raised in this comment letter are addressed in this section. For a summary of the comment letters, refer to Table 1-1 in Chapter 1, *Introductio*n, or see Appendix A.1, *Notice of Preparation and Scoping Meeting Comments*, for the complete comment letters.

Terminology

- **AFY**: acre-feet per year (approximately 325,851 gallons per year)
- **BMPs**: best management practices
- **LID**: low impact development
- **MGD**: millions of gallons per day

- **MS4**: municipal separate storm sewer system
- **NPDES**: National Pollution Discharge Elimination System
- **SWPPP**: stormwater pollution prevention plan
- **UWMP**: urban water management plan
- **WSA:** water supply assessment

3.17.1 Regulatory Framework

FEDERAL

Federal Safe Drinking Water Act

The Safe Drinking Water Act, the principal federal law intended to ensure safe drinking water to the public, was enacted in 1974 and has been amended several times since then. It authorizes the United States Environmental Protection Agency (EPA) to set national standards for drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally occurring and human-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Water Resources Control Board (SWRCB) conducts most enforcement activities. If a water system does not meet standards, it is the water supplier's responsibility to notify its customers.

America's Water Infrastructure Act of 2018

America's Water Infrastructure Act was signed into law on October 23, 2018, and authorizes federal funding for water infrastructure projects; expands water storage capabilities; assists local communities in complying with the Safe Drinking Water Act and Clean Water Act; reduces flooding risks for rural, western, and coastal communities; and addresses significant water infrastructure needs in tribal communities (Barasso 2018). Additionally, the act requires that drinking water systems that serve more than 3,300 people develop or update risk assessments and emergency response plans, which must be certified by the EPA within a deadline specified by America's Water Infrastructure Act.

Clean Water Act and National Pollution Elimination Discharge System

The Clean Water Act (CWA) establishes regulations to control the discharge of pollutants into the waters of the United States and regulates water quality standards for surface waters (US Code, Title 33, Sections 1251 et seq.). Under the act, the EPA is authorized to set wastewater standards and runs the National Pollutant Discharge Elimination System (NPDES) permit program. Under the NPDES program, permits are required for all new developments that discharge directly into Waters of the United States. NPDES permits generally identify effluent

and receiving water limits on allowable connections and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters and by the National Pretreatment Program for indirect discharges to a wastewater (sewage) treatment plant. NPDES permits for such discharges in the project region are issued by the Santa Ana Regional Water Quality Control Board (RWQCB).

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (Title 40 of the Code of Federal Regulations), Part 258, contains regulations for municipal solid waste landfills and requires states to implement permitting programs incorporating the federal landfill criteria. The federal regulations address landfill location, operation, design, groundwater monitoring, and closure.

STATE

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code Section 13000 et seq.) is the basic water quality control law for California. Under this Act, the State Water Board has ultimate control over state water rights and water-quality policy. In California, the EPA has delegated authority to issue NPDES permits to the State Water Board. The nine RWQCBs carry out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan, or Basin Plan, that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water-quality conditions and problems. The City of Costa Mesa is under the jurisdiction of the Santa Ana RWQCB (Region 8).

Urban Water Management Planning Act

The Urban Water Management Planning Act requires urban water suppliers to prepare an urban water management plan (UWMP) if they provide water for municipal purposes to more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water. The intent of the UWMP is to assist water supply agencies in water resource planning given their existing and anticipated future demands. The UWMP must include a water supply and demand assessment that compares total water supply available to the water supplier with the total projected water use over a 20-year period. It is also mandatory that UWMPs be updated every five years.

California Senate Bill 610 and 221

Senate Bill (SB) 610 and SB 221 were amended in 2001 to assure coordination between the local water and land use decisions to confirm that California cities and communities are provided

with adequate water supply. Specific projects are required to prepare a Water Supply Assessment (WSA). The WSA is composed of information regarding existing and forecasted water demands, as well as information pertaining to available water supplies for the new development.

The following projects are required to prepare a WSA:

- Residential developments consisting of more than 500 homes, or
- A business employing more than 1,000 people or having more than 500,000 square feet;
- A commercial office building employing more than 1,000 people or having more than 250,000 square feet of floor space;
- A hotel having more than 500 rooms;
- An industrial complex with more than 1,000 employees and occupying more than 40 acres of land; or
- A mixed-use project that requires the same or greater amount of water as a 500 dwelling-unit project.

SB 221 requires written verification that there is sufficient water supply available for new residential subdivisions that include over 500 dwelling units or meet the other requirements listed above. The verification must be provided before construction of the project begins.

Sustainable Groundwater Management Act of 2014

On September 16, 2014, a three-bill legislative package was signed into law, collectively known as the Sustainable Groundwater Management Act (SGMA). The Governor's signing message states, "a central feature of these bills is the recognition that groundwater management in California is best accomplished locally." Under the roadmap laid out by the legislation, local and regional authorities in medium and high-priority groundwater basins must form groundwater sustainability agencies (GSA) that oversee the preparation and implementation of groundwater sustainability plans (GSP).

The Water Conservation Act of 2009 (Senate Bill X7-7)

The Water Conservation Act of 2009, also known as SB X7-7, requires all California water suppliers to increase their water-use efficiency. The goal of the bill was to reduce urban water usage by 20 percent by 2020. Urban water suppliers who did not meet the 20 percent by 2020 objective would be ineligible for state water grants or loans. Water suppliers must continue to calculate baseline water usage and set goals to meet specified water reductions. Compliance with the SB X7-7 requirements is reported in the UWMPs.

Water Conservation Legislation 2018

In 2018, the California Legislature enacted two policy bills (SB 606 and Assembly Bill [AB] 1668) to establish long-term improvements in water conservation and drought planning to adapt to climate change and longer and more intense droughts in California (DWR 2026). The framework applies to both urban and agricultural water use. The California Department of Water Resources (DWR) and the SWRCB were tasked with establishing new water use efficiency standards for:

- Indoor residential water use
- Outdoor residential water use
- Commercial, industrial, and institutional water use for landscape irrigation with dedicated meters
- Water loss

Urban water suppliers are required to stay within annual water budgets based on their standards for their service areas, and to calculate and report their urban water use objectives in an annual water use report. The indoor residential water use standard was established with the passage of SB 1157 in 2022. As a result, the California Water Code defines a 47-gallon-per-person daily standard for indoor residential use beginning in 2025 and further decreases to 42 gallons by 2030.

The outdoor residential and commercial water use standards are established as landscape efficiency factors (LEF) and become progressively more efficient over time, with a LEF for residential and commercial account of 0.80 until 2035, at which time it decreases to 0.63 until 2040, and then establishes a LEF for residential outdoor accounts of 0.55 and a LEF for commercial outdoor accounts of 0.45 after 2040. The water loss standard is the maximum allowable “real” water loss measured in gallons per connection per day for each water purveyor’s service area. Real losses are defined as the volume of annual leakage from the water purveyor’s distribution system.

Collectively, the water use efficiency standards and local service area characteristics (such as population and landscape area) establish the Urban Water Use Objectives (UWUO) per urban retail water supplier that cannot be exceeded on an annual basis. Urban retail water suppliers are required to calculate and report their UWUOs alongside their actual usage in an annual report. The first reports were due to the SWRCB on January 1, 2024, and are required to be submitted every January 1 thereafter. The final proposed “Making Conservation a California Way of Life” regulation was adopted by the SWRCB on July 3, 2024, and became effective in January 1, 2025 (SWRCB 2026a).

The legislation also includes changes to UWMP preparation requirements. These changes include additional requirements for Water Shortage Contingency Plans (WSCP), expansion of dry

year supply reliability assessments to a five-year drought period, and establishment of annual drought risk assessment procedures and reporting.

Water Conservation in Landscaping Act of 2006 (AB 1881)

The Water Conservation in Landscaping Act (AB 1881) requires cities and counties to adopt the State of California's Model Water Efficient Landscape Ordinance (MWELO) or a comparable landscape water conservation ordinance that is at least as effective as the State's MWELO in conserving water.

The MWELO was revised in July 2015 via Executive Order B-29-15 to address the ongoing drought and to build resiliency for future droughts. The 2015 revisions to the MWELO increased water efficiency standards for new and retrofitted landscapes through more efficient irrigation systems, greywater usage, and on-site stormwater capture and by limiting the portion of landscapes that can be covered in turf. Each city and county is required to submit annual reports to DWR that document how the agency is achieving compliance with the State MWELO and how many projects were subject to the ordinance during the annual reporting period. Chapter 7, Landscaping Standards, of the City of Costa Mesa Municipal Code complies with AB 1881.

California Building Code: CALGreen

The California Building Standards Commission adopted the nation's first green building standards in July 2008, the California Green Building Standards Code, also known as CALGreen. CALGreen applies to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure in California. The code establishes planning and design standards for sustainable site development, including water efficiency and water conservation measures that typically reduce water consumption by 20 percent. CALGreen is updated every three years to allow for consideration and possible incorporation of new low flow plumbing fixtures and water efficient appliances.

Section 4.408 (Residential) and Section 5.408 (Nonresidential), Construction Waste Reduction, Disposal and Recycling, mandate that a minimum of 65 percent of nonhazardous construction and demolition debris generated during most new construction must be recycled or salvaged. CALGreen requires developers to prepare and submit a Construction and Demolition Recycling and Waste Reduction Plan, which is submitted to the City for approval, or use a waste management company with verifiable documentation. The waste management plan must:

- Identify the materials to be diverted from disposal, recycled, reused on the project, or salvaged for future use or sale.
- Specify if materials will be sorted on-site (source-separated) or bulk mixed (single stream).
- Identify the diversion facilities where the material will be taken.
- Identify construction methods employed to reduce the amount of waste generated.

- Specify that the amount of materials diverted be calculated by weight or volume, but not by both.

The mandatory provisions of CALGreen became effective January 1, 2011, and the latest version, the 2025 California Green Building Standards Code, became effective on January 1, 2026. The building efficiency standards are enforced through the local building permit process.

California Energy Code: Title 24, Part 6

Resource conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission, now the California Energy Commission, in June 1977 and most recently revised in 2024 (California Code of Regulations [CCR] Title 24, Part 6). Title 24 Part 6 requires the design of building shells and building components to conserve energy, including that generated from water consumption. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The 2025 standards become effective and replace the existing 2022 standards on January 1, 2026.

California Plumbing Code

The latest version of the California Plumbing Code was issued in 2025 and became effective as of January 1, 2026. The California Plumbing Code is updated on a three-year cycle. It specifies technical standards for the design, materials, workmanship, and maintenance of plumbing systems. One of the purposes of the plumbing code is to prevent conflicting plumbing codes within local jurisdictions. Among many topics covered in the code are water fixtures, potable and non-potable water systems, and recycled water systems.

California Water Code

The California Water Code states that the water resources of the State must be put to beneficial use and that waste or unreasonable use of water should be prevented. The code is divided into several sections that include provisions regarding water quality, formation of irrigation districts and water districts, safe drinking water, and water supply and infrastructure improvements. The California Water Code also addresses water shortage emergencies, drought planning, conservation mandates, potable water reuse, appropriation of water, and water rights.

Mandatory Water Conservation

Following the declaration of a state of emergency on July 15, 2014, due to drought conditions, the SWRCB adopted Resolution No. 2014-0038 for emergency regulation of Statewide water conservation efforts (SWRCB 2014). These regulations, which went into effect on August 1, 2014, were intended to reduce outdoor urban water use and persuade all California households to voluntarily reduce their water consumption by 20 percent. Urban water suppliers with 3,000

or more service connections were required to report monthly water consumption to the SWRCB.

In January of 2022, following the governor's proclamation of a drought state of emergency for all counties, the SWRCB adopted the prohibited wasteful water uses emergency regulations. These include the prohibition of the following wasteful water use practices: 1) the application of potable water to outdoor landscapes in a manner that causes excess runoff; 2) the washing of vehicles without an automatic shut-off nozzle; 3) the application of potable water to driveways and sidewalks; 4) the use of potable water in nonrecirculating ornamental fountains; and 5) the application of potable water to outdoor landscapes during and within 48 hours after at least 0.25 inch of rainfall. In June of 2022, additional emergency water conservation regulations were enacted prohibiting the irrigation of nonfunctional turf at commercial, industrial, and institutional accounts, and the implementation of conservation actions under Level 2 of urban water suppliers' WSCPs. As of June 5, 2024, the emergency regulations expired.

In October of 2023, AB 1572 was signed into law by the governor, prohibiting the irrigation of nonfunctional turf at commercial, industrial, and institutional sites (with exceptions for areas irrigated with recycled water or harvested rainwater). The irrigation prohibitions become effective in stages between 2027 and 2031, beginning with state and local government facilities. Under the law, urban water suppliers must adopt the same irrigation prohibitions into their local regulations.

State Water Resources Control Board Division of Drinking Water

The California Division of Drinking Water (DDW) regulates public water systems within California; oversees water recycling projects; permits water treatment devices; and supports and promotes water system security. The Division of Financial Assistance provides funding opportunities for drinking water system improvements; provides support for small water systems and for improving technical, managerial, and financial capacity; and certifies drinking water treatment and distribution operators. The Field Operations Branch of the Division of Drinking Water is responsible for the enforcement of the federal and California Safe Drinking Water Acts and the regulatory oversight of approximately 7,500 public water systems to ensure the delivery of safe drinking water to all Californians. In this capacity, Field Operations Branch staff perform field inspections, issue operating permits, review plans and specifications for new facilities, take enforcement actions for noncompliance with laws and regulations, review water quality monitoring results, and support and promote water system security.

SWRCB General Waste Discharge Requirements

The General Waste Discharge Requirements (Order No. 2022-0103-DWQ) specify that all federal and state agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of

California need to develop a sewer master plan. The master plan evaluates existing sewer collection systems and provides a framework for undertaking the construction of new and replacement facilities to maintain proper levels of service. It includes inflow and infiltration studies to analyze flow monitoring and water use data, a capacity assurance plan to analyze the existing system with existing land use and unit flow factors, a condition assessment and sewer system rehabilitation plan, and a financial plan with recommended capital improvements and financial models.

SWRCB General Construction Permit

Construction activities that disturb one or more acres of land that could impact hydrologic resources must comply with the requirements of the SWRCB Construction General Permit (Order No. 2022-0057-DWQ). Under the terms of the permit, applicants must file permit registration documents (PRD) with the SWRCB prior to the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, Storm Water Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website.

Applicants must also demonstrate conformance with applicable best management practices (BMP) and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection, and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program, a sampling program to ensure compliance with water quality standards, and on-site collection of samples and inspection of BMPs during a qualifying precipitation event.

SWRCB Trash Amendment

On April 7, 2015, the SWRCB adopted an amendment to “Water Quality Control Plan for Ocean Waters of California” to control trash. In addition, “Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California” added “Part 1, Trash Provisions.” Together, they are collectively referred to as the "Trash Amendments." The Trash Amendments provide statewide consistency for the RWQCBs in their regulatory approach to protect aquatic life and public health beneficial uses, reduce environmental issues associated with trash in State waters, and focus limited resources on high-trash-generating areas (SWRCB 2015).

The Trash Amendments apply to all Phase I and II permittees under the NPDES MS4 permits. Compliance with the Trash Amendment requires municipalities to install certified trash treatment control systems on all catch basins no later than December 2, 2030 (SWRCB 2026b).

The Santa Ana RWQCB implements the statewide Trash Amendments through Water Code Section 13383 Orders that contain region-specific requirements.

California Integrated Waste Management Act

California's Integrated Waste Management Act of 1989 (AB 939) required that cities and counties divert 50 percent of all solid waste from landfills as of January 1, 2000, through source reduction, recycling, and composting. The Act required that each city and county prepare a Source Reduction and Recycling Element to be submitted to the Department of Resources Recycling and Recovery (CalRecycle), a department within the California Natural Resources Agency. AB 939 also establishes a goal for all California counties to provide at least 15 years of ongoing landfill capacity. In 2007, SB 1016 amended AB 939 to establish a per capita disposal measurement system. The per capita disposal measurement system is calculated as a jurisdiction's reported total disposal of solid waste divided by a jurisdiction's population. CalRecycle sets a target per capita disposal rate for each jurisdiction. Each jurisdiction must submit an annual report to CalRecycle with an update of its progress in implementing diversion programs and its current per capita disposal rate.

Mandatory Commercial Recycling Requirements

AB 341 (Chapter 476) set a statewide solid waste diversion goal of 75 percent by 2020. AB 341, which was passed in 2011 and took effect July 1, 2012, mandates recycling for businesses producing four or more cubic yards of solid waste per week or multi-family residential dwellings of five or more units. Under AB 341, businesses and multi-family dwellings of five or more units must separate recyclables from trash and either subscribe to recycling services, self-haul their recyclables, or contract with a permitted private recycler.

Mandatory Organics Recycling Act

AB 1826, which was enacted in 2014, mandates organic waste recycling for all businesses and multifamily dwellings with five or more units. Starting January 1, 2020, all generators of 2 cubic yards or more of garbage, recycling, and compost combined per week must recycle organic waste. Organic waste includes food scraps, food-soiled paper waste, yard trimmings, and landscape materials. Organic waste can be recycled through composting, mulching, and anaerobic digestion which produces renewable energy and fuel. In addition to recycling food scraps, donating surplus food to local food banks can be part of the AB 1826 compliance effort.

California Short-Lived Climate Pollutants Act

SB 1383 focuses on the elimination of methane gas created by organic materials in landfills and set targets to achieve a 50 percent reduction in the statewide disposal of organic waste by 2020 and a 75 percent reduction by 2025. Organic waste makes up half of what Californians send to landfills. SB 1383 requires all businesses and residents to divert organic materials (including food waste, yard waste, and soiled paper products) from the landfill. The regulation took effect

on January 1, 2022, and requires that organics collection service be provided to all residents and businesses. The collected organic waste must be recycled into new products, such as compost, mulch, biofuel, and electricity. Each city and county have an annual procurement target based on its population. Also, an edible food recovery program must be established by 2025 with the goal of recovering 20 percent of currently disposed edible food that would otherwise be sent to landfills to feed people in need. Mandated food donors and food recovery organizations and services must keep records of the amount and dates of food donations and acceptances.

California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and Recycling Access Act requires development projects to set aside areas for collecting and loading recyclable materials. This act required CalRecycle to develop a model ordinance for adoption by any local agency to provide adequate areas for the collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt a model or an ordinance of their own that establishes standards, including space allocation, for the collection and loading of recyclable materials.

REGIONAL

Mesa Water District 2020 Urban Water Management Plan

Mesa Water District (Mesa Water) created the 2020 Urban Water Management Plan (UWMP) to fulfill requirements set by the DWR and the Urban Water Management Planning Act. As a retail water supplier, Mesa Water sources water locally from the Orange County Groundwater Basin, recycled water from the Orange County Water District, and maintains a backup supply from the Municipal Water District of Orange County. This comprehensive UWMP assesses the reliability of water supply over a 20–25-year horizon, evaluating current and future water sources and demands in its service area. The 2020 update revises components from the 2015 UWMP concerning water resource needs, efficiency, reliability assessment, and strategies to handle water shortages, and includes a new Water Shortage Contingency Plan to effectively manage potential shortages. It meets all updated compliance requirements established by the Act since 2015 (Mesa Water 2021).

Mesa Water is in the process of updating the UWMP and the 2025 UWMP should be available by summer 2026.

Mesa Water District Water Shortage Contingency Plan

The Water Shortage Contingency Plan (WSCP) for Mesa Water is included in the 2020 UWMP as Appendix H. The WSCP is a standalone document which provides a structured guide for Mesa Water to deal with water shortages, incorporating prescriptive information and standardized action levels, lists the appropriate actions and water use efficiency measures to be taken to

ensure water supply reliability in times of water shortage conditions, along with implementation actions in the event of a catastrophic supply interruption (MWD 2021).

Santa Ana RWQCB General Waste Discharge Requirements

The project is regulated under the NPDES Phase I Municipal Stormwater Permits issued by the Santa Ana RWQCB for Orange County (Order No. R8-2009-0030 [NPDES Permit No. CAS618030]). The Order requires dischargers to adopt a Sewer System Management Plan and a grease (e.g., fats, oils, and grease) control ordinance to require commercial food establishments to install and maintain sewer interceptors. The Order also requires dischargers to establish other legal authority to preserve the integrity of the sewer system and prevent sewer system spills.

Orange County Sanitary District: Sewer Charges

The Orange County Sanitary District (OCSD) Ordinance No. OCSD-38 is imposed when a property newly connects to the OCSD system, or a previously connected property expands its use. Revenue generated under the provision of this ordinance shall be used for the acquisition, construction, reconstruction, maintenance, and operation of the local sewer system together with costs of administration.

OCSD: Wastewater Discharge Regulations

OCSD Ordinance No. 53 sets limits on wastewater discharged to sewers and conveyed to OCSD wastewater treatment plants. Ordinance No. 53 also limits concentrations of certain substances, including metals and hazardous materials.

Orange County Drainage Area Management Plan

The County's 2003 Drainage Area Management Plan (DAMP) describes the agreements, structures, and programs that (OCPW 2023):

- Provide the legal authority for prohibiting unpermitted discharges into the storm drain system and for requiring BMPs in new development and significant redevelopment;
- Improve existing municipal pollution prevention and removal BMPs to further reduce the amount of pollutants entering the storm drain system;
- Educate the public about the issue of urban stormwater and non-stormwater pollution and obtain their support in implementing pollution prevention BMPs;
- Ensure all new development and significant redevelopment incorporates appropriate site design, source control and treatment control BMPs to address specific water quality issues;
- Ensure construction sites implement control practices that address control of construction-related pollutant discharges, including erosion and sediment control and on-site hazardous materials and waste management;

- Ensure that existing development address discharges from industrial facilities, selected commercial businesses, residential development, and common interest areas/homeowner associations;
- Detect and eliminate illegal discharges/illicit connections to the municipal storm drain system;
- Identify impacted receiving waters and produce environmental quality information to direct management activities, including prioritization of pollutants to support the development of specific controls to address these problems; and
- Assess watersheds and manage urban runoff on a watershed basis.

Countywide Integrated Waste Management Plan

Public Resources Code (PRC) Sections 41770 and 41822, and 14 CCR Section 18788 require that each countywide or regional agency integrated waste management plan (CIWMP or RAIWMP), and the elements thereof, be reviewed, revised if necessary, and submitted to the Department of Resources Recycling and Recovery (CalRecycle) every five years. CalRecycle developed this Five-Year CIWMP/RAIWMP Review Report template to streamline the Five-Year CIWMP/RAIWMP review, reporting, and approval process (OC Waste & Recycling 2021).

LOCAL

Costa Mesa Sanitary District Master Plan Update

The Costa Mesa Sanitary District (CMSD) prepared an update to its Master Plan in November 2021. The purpose of this updated report was to determine whether the system has the capacity to handle flows from ultimate buildout of the CMSD service area. The plan compares the capacity of the sewer mains to the ultimate flow generated by complete buildout of the land uses inside the jurisdictional boundaries of the agency. When the wastewater system was originally designed in the early 1950's, the development densities and the anticipated flows were very low when compared with current maximum flows. Additionally, stormwater runoff is making its way into the system through infiltration and inflow. These additional flows require wastewater lines to be larger to accommodate the additional flows during periods of heavy rainfall. CMSD has adopted the industry standard of designing new sewer lines up to 18 inches in diameter to be flowing no more than half-full at peak wet-weather conditions. However, when analyses of existing conditions are completed for the purposes of determining when additional capacity is required, flows above these limits are acceptable. However, at no time are sewers allowed to flow in a surcharged or pressure conditions.

As part of the 2021 Update, flow monitoring indicated the peak flows had not met the threshold for the proposed sewer improvement of the 18-inch line in Harbor Boulevard north of the project site, to Baker Street.

CMSD Operations Code

The CMSD is responsible for providing wastewater collection and transmission to OCSD facilities for treatment and disposal. The CMSD Operations Code codifies all existing CMSD regulations that pertain to ongoing CMSD operations to provide staff and the public with useful references to CMSD regulations. The Operations Code ensures wastewater facilities are complete, correctly operating, and in compliance with government codes and wastewater industry practices. The Operations Code also provides interested parties with procedures, policies, and requirements for the design and construction of new CMSD wastewater infrastructure.

City of Costa Mesa Storm Drain Master Plan Update (2022–2026)

In 2021, the City updated their storm drain master plan and storm drain connection fees. The Existing Conditions Assessment Report (ECAR) was completed in 2022 and ultimately approved by the City in October 2024. The ECAR consisted of a citywide hydraulic model to analyze existing conditions for 10-year, 25-year and 100-year storm events. The modeling results were compared against known flooding events to ensure an accurate model. The ECAR did not identify any high priority storm drain improvements associated with the area of the FDCSP including those city-owned storm drains north and south of the project site.

Phase II of the storm drain master plan update included the development of the Proposed Drainage and Water Quality Improvements report to identify additional details on the highest priority improvements, locations, design details, cost estimates and opportunities for regional stormwater BMP projects for stormwater and water quality benefits. This report was also approved by the City in October 2024. Similar to the ECAR, the Phase II report concluded there are no high priority storm drain improvements or regional BMPs associated with the FDCSP area.

Phase III of the storm drain master plan update included the Storm Drainage Impact Fee Nexus Study prepared in February 2026. The City Council introduced an ordinance and recommended fee adoption on April 7, 2026 as the final component of the 2024 Storm Drain System Master Plan update (Costa Mesa 2026a). The updated fee study identifies different drainage fees for the Santa Ana Watershed compared to the Newport Bay Watershed. The FDCSP falls within the Santa Ana Watershed and would be subject to the updated fees associated with this watershed. The proposed fees would be based on a fee per impervious acre in relation to different land use types (Appendix K.1).

Costa Mesa General Plan

The City of Costa Mesa General Plan includes policies relevant to utilities and utility systems that would apply to the proposed project.

Conservation Element

- **Policy CON-2.A.9.** Encourage waste management programs that promote waste reduction and recycling to minimize materials sent to landfills. Maintain robust programs encourage residents and businesses to reduce, reuse, recycle, and compost.
- **Policy CON-2.A.10.** Support waste management practices that provide recycling programs. Promote organic recycling, landfill diversion, zero waste goals, proper hazardous waste collections, composting, and the continuance of recycling centers.
- **Policy CON-2.A.11.** Continue construction and demolition programs that require recycling and minimize waste in haul trips.
- **Policy CON-3.A.1.** Continue to consult with local water districts and the Orange County Water District to ensure reliable, adequate, and high quality sources of water supply at a reasonable cost.
- **Policy CON-3.A.3.** Restrict use of turf in new construction and landscape reinstallation that requires high irrigation demands, except for area parks and schools, and encourage the use of drought-tolerant landscaping.
- **Policy CON-3.A.5.** Work with public and private property owners to reduce stormwater runoff in urban areas to protect water quality in storm drainage channels, the Santa Ana River, and other local water courses that lead to the Pacific Ocean.
- **Policy CON-3.A.6.** Continue to develop strategies to promote stormwater management techniques and storm drain diversion programs that collectively and naturally filter urban runoff.
- **Policy CON-3.A.7.** Continue to comply with the National Pollutant Discharge Elimination System Program (NPDES) by participating in the Countywide Drainage Area Management Plan (DAMP), which stipulates water quality requirements for minimizing urban runoff and discharge from new development and requires the provisions of applicable Best Management Practices (BMP).
- **Policy CON-3.A.8.** Require that all applicable development projects be reviewed with regards to requirements of both the on-site Water Quality Management Plan and State requirements for runoff and obtaining a Storm Water Pollution Prevention Plan (SWPPP) permit.
- **Policy CON-3.A.9.** Continue to consult with the Costa Mesa Sanitation District and the Orange County Sanitation District to modernize wastewater treatment facilities to avoid overflows of untreated sewage.

Costa Mesa Municipal Code

The Costa Mesa Municipal Code includes various directives that pertain to utilities and utility systems in Costa Mesa.

- **Title 8, Health and Sanitation, Chapter IV, Garbage, Rubbish, and Weeds.** This chapter describes solid waste enterprises providing recurring collection services to commercial businesses in Costa Mesa must operate under a franchise agreement that includes specific protections and guarantees. Key requirements of the agreement are: (1) adherence to the City of Costa Mesa Source Reduction and Recycling Element and any applicable state laws or regulations, which mandate a minimum 50 percent diversion rate for solid waste through source reduction, recycling, and composting, and a 65 percent diversion rate for construction and demolition waste; (2) guaranteed capacity for waste at state-regulated solid waste facilities that comply with permit and regulatory terms; (3) the provision of technical, instructional, promotional, and educational programs to educate customers about relevant state laws, such as AB 939, AB 341, AB 1826, AB 827, and SB 1383; (4) compliance with state regulations in the collection programs, containers, and service methodologies outlined in the agreement; and (5) the establishment of special waste programs as specified in the agreement.
- **Title 8, Chapter IV, Section 8-84, Source reduction and recycling by franchisees and permit holders.** This section is enacted for the purpose of compliance with the California Integrated Waste Management Act of 1989. The city has adopted a source reduction and recycling element and household hazardous waste element pursuant to said Act which provides for the imposition and collection of charges to fund the preparation, adoption and implementation of said elements. Such charges shall be determined, fixed and established by the city council by resolution. Such charges may be changed by the city council from time to time by resolution.
- **Title 13, Chapter 7, Landscaping Standards.** Outlines landscaping standards aimed at promoting water conservation and sustainable practices. Its objectives include establishing reasonable requirements for design and maintenance of landscapes, addressing public health and safety, protecting the environment, and encouraging the use of drought-tolerant materials. The chapter adheres to State regulations, specifically State Assembly Bill 1881, and provides guidelines for efficient irrigation to minimize water waste.

3.17.2 Existing Conditions

WATER

Water Supply

Mesa Water provides domestic water services to most of the City, portions of the City of Newport Beach and a small portion of unincorporated Orange County, with a total water service area of 18 square miles. Mesa Water would provide water to all portions of the project site.

Every urban water supplier is required to assess its reliability to provide water service to its customers under normal, dry, and multiple dry water years. The 2020 UWMP states that Mesa

Water would be able to meet projected demands between 2025 and 2045 during normal years, single dry years, and multiple dry years (see Table 3.17-1, *Normal, Single Dry, and Multiple Dry Year Supply and Demand (AFY)*).

Table 3.17-1 Normal, Single Dry, and Multiple Dry Year Supply and Demand (AFY)

Scenario	2025	2030	2035	2040	2045
Normal Year					
Supply Totals	17,555	17,928	18,472	19,032	19,592
Demand Totals	17,555	17,928	18,472	19,032	19,592
Single Dry Year					
Supply Totals	18,784	19,183	19,765	20,364	20,963
Demand Totals	18,784	19,183	19,765	20,364	20,963
Multiple Dry Year [1]					
Supply Totals	17,687	19,689	21,612	22,267	22,923
Demand Totals	17,687	19,689	21,612	22,267	22,923

Source: Appendix G.1

Note: AFY= acre-feet per year.

Multiple Dry Years starts in 2026.

Projected water demands for the proposed project include general commercial, open space (irrigation), and high- and low-density residential. In order to determine how the proposed project's water demand would impact Mesa Water's projected supply and demand, the total water demand was calculated using the acres per land use and housing units multiplied by a water demand factor (WDF) for the project site's total existing and the proposed projected water demand (See Appendix G.1, for more detail on these calculations).

Table 3.17-2, *Existing Water Demand*, presents the water demand currently at the project site. As shown in Table 3.17-2, the project site's average day water demand (ADD) is 194,135 gallons per day (GPD) or 394 AFY.

Table 3.17-2 Existing Water Demand

Land Use	WDF (GPD/acre)	WDF (GPD/DU)	DU	Area (acre)	ADD		MDD	
					GPD	AFY	GPD	AFY
Open Space Irrigation	2,400			24	57,000	64	142,500	160
General Commercial	2,500			13	32,375	37	48,563	56
Low Density Residential	-	180	250	50	45,000	51	67,500	77
High-Density Residential	-	180	332	8	59,760	67	89,640	101
Total Development	**-**		**582**	**95**	**194,135**	**219**	**348,203**	**394**

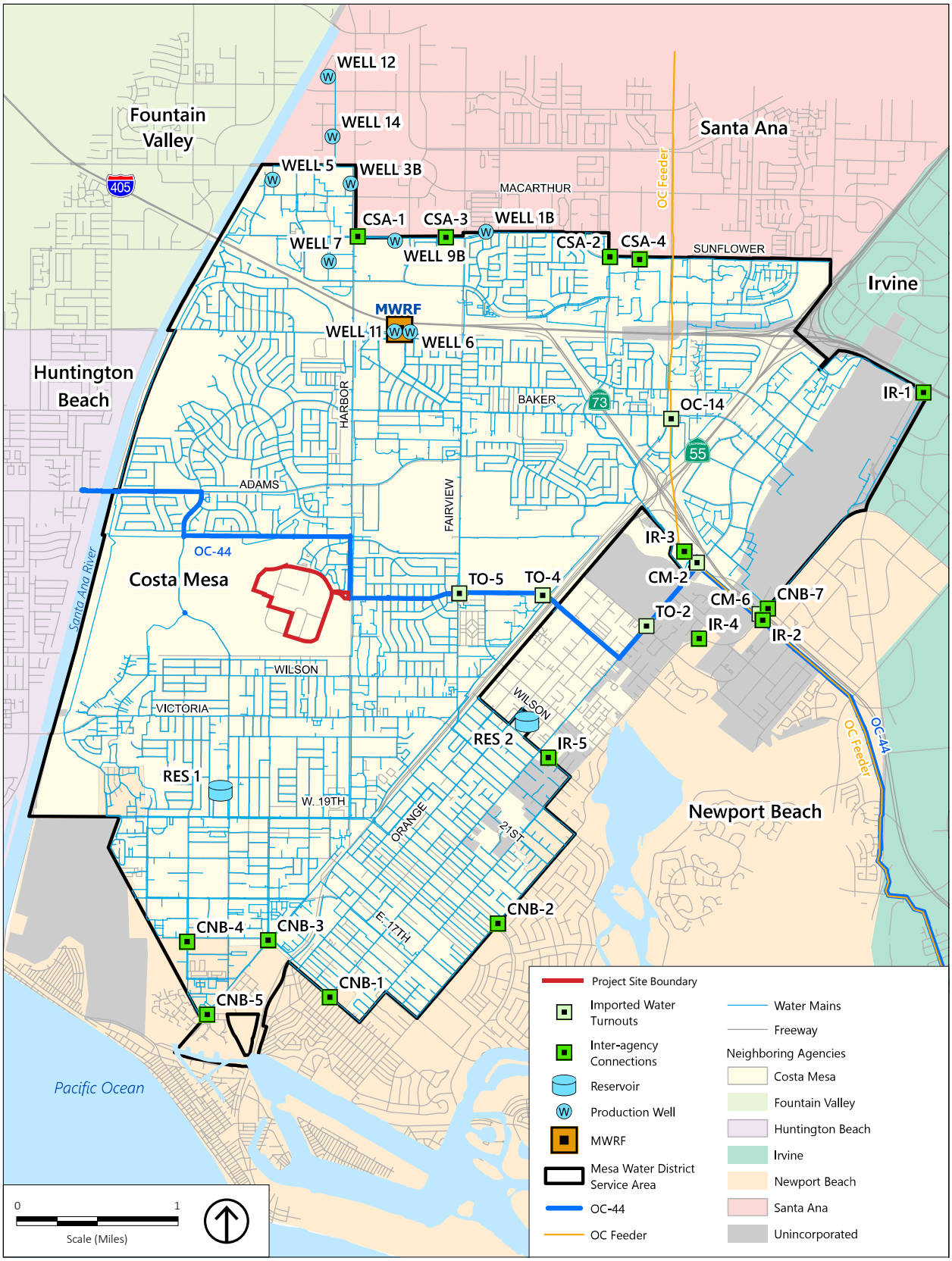
Source: Appendix G.1.

Notes: WDF= water demand factor; GPD= gallons per day; DU= dwelling unit; AFY= acre feet per year; ADD = average day water demand; MDD=maximum day water demand

Water Distribution System

Mesa Water's primary source of water is groundwater pumped from seven active clear wells within the Orange County Groundwater Basin plus two amber-colored wells at the Mesa Water Reliability Facility (MWRF). Mesa Water's current supply mix consists of 100 percent groundwater. In addition to groundwater, Mesa Water has a backup water supply of imported water from Metropolitan Water District of Southern California (Metropolitan) through deliveries from the Municipal Water District of Orange County (MWDOC), one of Metropolitan's member agencies. Additionally, Mesa Water has several emergency interconnections with three neighboring agencies, the City of Santa Ana, City of Newport Beach, and Irvine Ranch Water District. A portion of Mesa Water's irrigation demands are met with recycled water provided by Orange County Water District that is delivered through the Green Acres Projects. Mesa Water owns and operates seven groundwater wells that pump clear water from the Basin and has a combined pumping capacity of 17,200 gallons per minute (GPM) or 24.8 million gallons per day (MGD) if all wells would be operating 24 hours a day, 7 days a week.

A map of Mesa Water's existing supplies are shown on Figure 3.17-1, *Existing Water Supplies*. As shown in Figure 3.17-1, there are water mains in the Harbor Village apartments located north of the project site. The water mains are connected to OC-44, which connects to East Orange County Feeder No. 2. There is an on-site looped water distribution system of 6-inch and 8-inch diameter water mains that connect to an existing 12-inch diameter water main beneath Harbor Boulevard.



Source: West & Associates 2026.

Figure 3.17-1
Existing Water Supplies

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WASTEWATER INFRASTRUCTURE

The wastewater for the project site is conveyed from the project site to a local sewer system in Harbor Boulevard that is owned and operated by CMSD. The existing sanitary sewer system for the property currently connects to the CMSD sewer system via an 18-inch private sewer line just south of Merrimac Way. The wastewater is conveyed in Harbor Boulevard northerly in the CMSD sewer system to the OCSD trunk sewer facility at Baker Street.

The local CMSD sewer system that accepts wastewater from the project site consists of vitrified clay pipe (VCP) in Harbor Boulevard from the project site, northerly to Baker Street, approximately 1 mile northerly of the project site. The CMSD sewer system consists of two parallel 15-inch diameter sewer lines (2,000 linear feet) that drain northerly from Fair Drive to Merrimac Way fronting the project site, then combine into an 18-inch diameter sewer (4,000 lineal feet) from Merrimac Way to the connection with the OCSD trunk sewer at Baker Street to the north.

The OCSD sewer system at Baker Street consists of a 90-inch diameter reinforced concrete pipe (RCP) and collects and conveys the wastewater to the OCSD Plant 1 for treatment and processing. Plant 1 is in Fountain Valley, approximately two miles northwest of the project site.

The existing sewer facilities are depicted in Figure 3.17-2, *Existing Sewer Facilities*.

Flow Monitoring of Existing Manholes

Two sewer manholes within the 18-inch CMSD sewer main in Harbor Boulevard were monitored for a three-week period from March 28, 2024, to April 19, 2024. The north manhole is located near Baker Street, upstream of the connection to the OCSD trunk sewer line. The south manhole is just north of Mesa Verde Drive East. The results of the monitoring are presented in Table 3.17-3, *Existing Conditions per Monitored Manholes*. Data of the south manhole are used in the assessment of sewer capacities due to the higher recorded depth of 6.83 inches.

Table 3.17-3 Existing Conditions per Monitored Manholes

Manhole (MH)	Location	Pipe Diameter (in)	Existing Peak Flow (MGD)	Existing Peak Flow (cfs)	Existing Peak Flow Depth (in)	Existing % Full
(Upstream) South MH #103191	Harbor Blvd ~280 ft N/O Mesa Verde Dr. E.	18	1.545	2.391	6.83	38
(Downstream) North MH #103213	Harbor Blvd ~125 ft S/O Baker St.	18	1.641	2.539	5.97	33

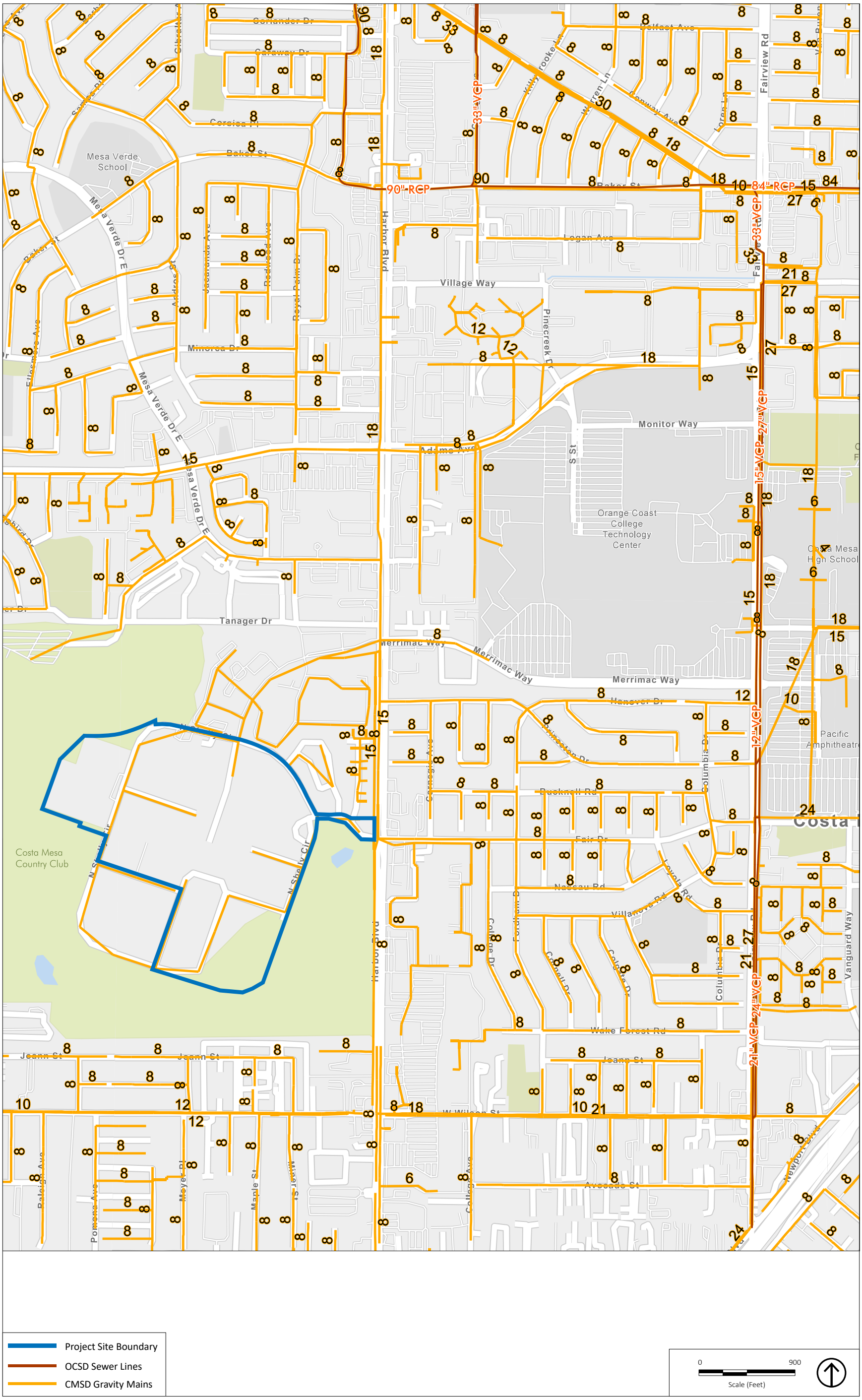
Source: Appendix K.1.
Note: MGD= million gallons per day, in=inches, cfs=cubic feet per second

STORMWATER INFRASTRUCTURE

The existing FDCSP on-site storm drain system consists of a network of inlets and storm drainpipes that discharge via a 36-inch diameter storm drainpipe at the northwest corner of the project site. This 36-inch diameter storm drain runs west of the project site through the adjacent Costa Mesa Country Club's golf course, continues under a golf course pond, and discharges at the ground surface in the vicinity of an existing 42-inch culvert at the OCFCD Fairview Channel (Facility No. D04).

The existing 36-inch storm drain that runs through the golf course is four to five feet deep and consists of RCP for the reach from the project site and switches to a 36-inch corrugated metal pipe (CMP) for the reach downstream of the pond. The Fairview Channel (OCFCD Facility No. D04) consists of a concrete trapezoidal channel that drains northwest and merges into the OCFCD Greenville-Banning Channel (OCFCD Facility No. D03), then into the Santa Ana River, which ultimately discharges into the Pacific Ocean. Additionally, there is a City-owned, 54-inch storm drain north along the golf course boundary at Tanager Drive that also discharges into the golf course to the west of the clubhouse building. From there the drainage continues through the golf course within a concrete swale before discharging into the channel via a 42-inch diameter storm drain culvert/lateral. Lastly, two storm drain systems traverse through the south and southwest portions of the golf course, south of the project site. These storms drain systems include the 96-inch/114-inch Maple Storm Drain, owned by the City of Costa Mesa, along with a City-owned 72-inch storm drain. These two storm drain systems connect with the upper reach of the reinforced-concrete trapezoidal Fairview Channel (D04).

The existing storm drain facilities are shown in Figure 3.17-3, *Existing Storm Drain Facilities*.



Source: FUSCOE 2026.

Figure 3.17-2
Existing Sewer Facilities

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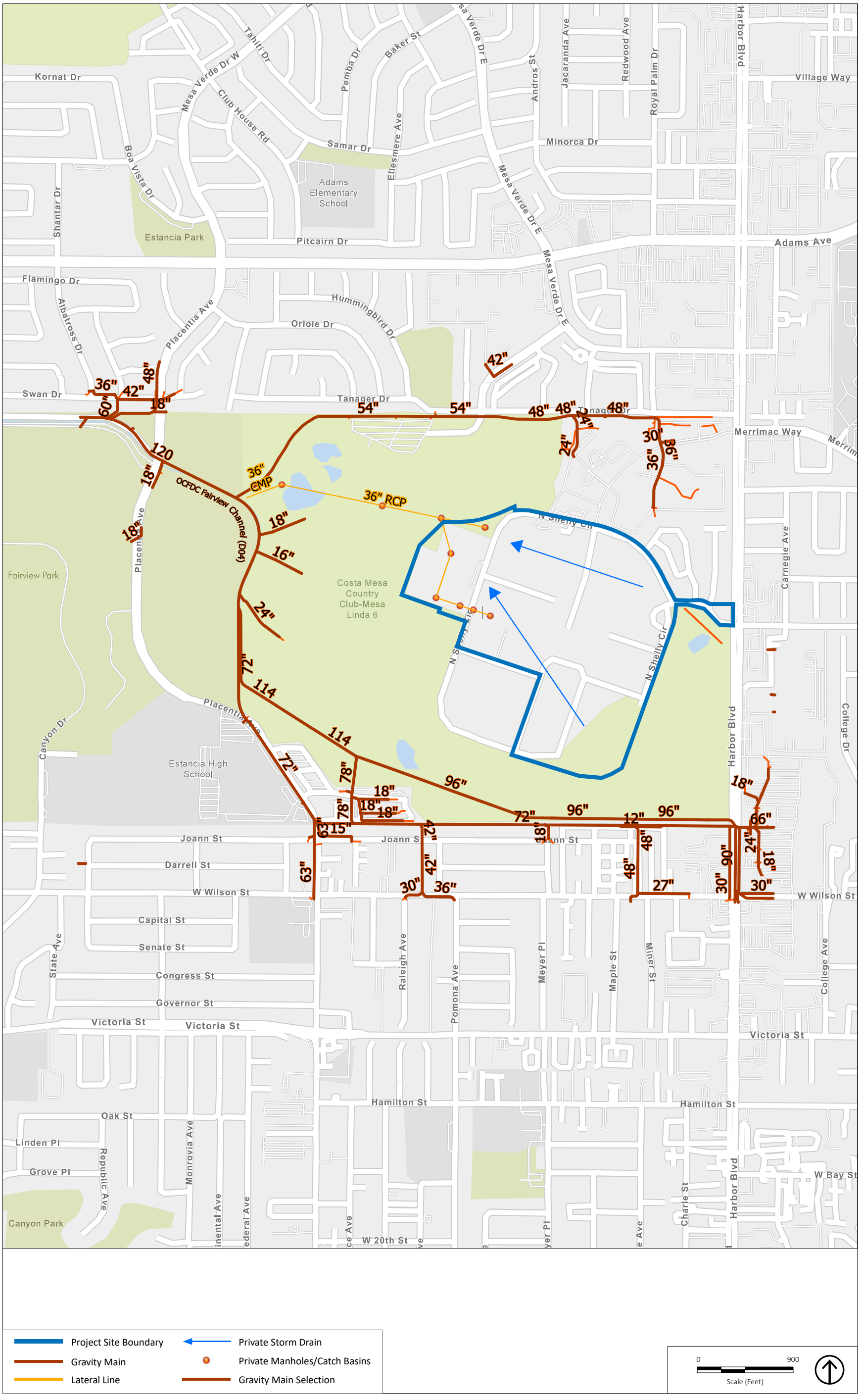

Source: FUSCOE 2026.

Figure 3.17-3
Existing Storm Drain Facilities

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As described in Section 3.9, *Hydrology and Water Quality*, the Infrastructure Report for the project (see Appendix K.1) identified several off-site drainage issues, including a damaged portion of the 36-inch storm drain west of the site and localized flooding during large storm events in a concrete swale before reaching the Fairview Channel. The City of Costa Mesa confirmed that the existing storm drain systems to the south and west of the project site do not have sufficient capacity for a direct piped connection from the project site, and that proposed drainage patterns should remain consistent with existing conditions. To address the off-site drainage issues, the City of Costa Mesa is requiring the project to meet the following conditions before project implementation:

- Condition analysis (CCTV) of the existing 36-inch storm drain that accepts drainage from the FDCSP and Southern Regional Emergency Operations Center (SREOC) site.
- Replacement of the corrugated metal pipe (CMP) portion of the storm drain with reinforced concrete pipe (RCP).
- Realign the 36-inch RCP storm drain to avoid the lake (on golf course).
- Determine capacity of the existing 36-inch storm drain.
- Proposed condition 25-year peak flow to match existing 25-year peak flow, including on-site detention if necessary.
- Prepare detailed hydrology and hydraulics report for City review and approval, based on the approved site plan.

SOLID WASTE

Collection Service

The City uses a non-exclusive franchise system to manage trash and recycling service to multi-family (5 or more units) and business properties, as well as any for-hire hauling of temporary waste collection containers from construction and demolition projects. The City also has a permit system that allows contractors to self-haul the waste generated by their primary business activity (i.e. roofing, land grading, etc.). Both the commercial non-exclusive franchise and the contractor self-haul permit system provide competition to keep collection service rates among the lowest in the County (Costa Mesa 2026b).

Current Costa Mesa haulers are:

- CR&R, Inc.
- Robert's Waste & Recycling.
- Haul-Away Rubbish Service Co.
- Waste Management of Orange County (WM)
- Rainbow Disposal Co., Inc.
- Ware Disposal
- Universal Waste Systems.

Landfills

Non-recyclable waste generated by the City is disposed of at several facilities across California. These include Antelope Valley Public Landfill, Azusa Land Reclamation Co. Landfill, Chiquita Canyon Sanitary Landfill, El Sobrante Landfill, Frank R. Bowerman Sanitary Landfill, Lancaster Landfill and Recycling Center, Mid-Valley Sanitary Landfill, Olinda Alpha Landfill, Prima Deshecha Landfill, San Timoteo Sanitary Landfill, Simi Valley Landfill & Recycling Center, and Southeast Resource Recovery Facility. However, Frank R. Bowerman Sanitary Landfill accepts the majority (approximately 70 percent) of solid waste from the City (CalRecycle 2019). For the purposes of this analysis, all waste under the proposed project is assumed to be accepted by the Frank R. Bowerman Sanitary Landfill.

The Frank R. Bowerman Sanitary Landfill is at 11002 Bee Canyon Access Road in Irvine and operated by the County of Orange County Waste and Recycling. The landfill is a Class III landfill and accepts mixed municipal, industrial, and construction and demolition. The landfill has a maximum daily permitted throughput of 11,500 tons and its estimated cease date is November 2053 (CalRecycle 2026a). Table 3.17-4, *Frank R. Bowerman Sanitary Landfill Characteristics,* summarizes the capacity and other relevant information of the landfill.

Table 3.17-4 Frank R. Bowerman Sanitary Landfill Characteristics

	Frank R. Bowerman Sanitary Landfill
Total waste from the City received in 2019 (tons)	97,805
Total waste received from Costa Mesa in 2019 (tons)	69,050
Maximum permitted throughput (TPD)	11,500
Average daily disposal rate in 2024 (TPD)	7,710
Excess daily capacity (TPD)	3,790
Remaining capacity (cubic yards)	160,896,082
Estimate closing date	2053

Sources: CalRecycle 2019a; 2019b;2024; 2026a.
Note: TPD = tons per day

Solid Waste Diversion and Recycling

Compliance with AB 939 is measured by comparing the CalRecycle target disposal rates for residents and employees to actual disposal rates. The 2024 target disposal rates for Costa Mesa were 8.5 pounds per day (PPD) for residents and 11.3 PPD for employees. Actual disposal rates in 2024 were 7.3 PPD for residents and 9.5 PPD for employees (CalRecycle 2026b). Therefore, solid waste diversion goals for the City are in compliance with AB 939.

ENERGY INFRASTRUCTURE

Energy infrastructure at the project site was historically provided by an on-site central power plant associated with the FDC. This centralized system generated and distributed electricity throughout the campus via internal distribution lines. Following the decommissioning of the FDC, the central plant is no longer operational, and the project site does not currently have active electrical demand or ongoing energy use. The existing electrical and natural gas infrastructure was designed to serve an institutional campus and does not meet current utility standards for modern residential and commercial development. Therefore, the existing on-site electrical and natural gas systems are considered unsuitable for reuse.

OTHER UTILITIES

Telecommunications services within the City of Costa Mesa are provided by a variety of private providers offering broadband internet, telephone, cable, and wireless communication services. These services support residential, commercial, and institutional uses throughout the City. Telecommunications infrastructure typically includes fiber-optic and copper lines, cellular facilities, wireless networks, and related equipment.

High-speed broadband internet service is widely available throughout the City from several providers, including AT&T, Spectrum, T-Mobile, Verizon, and satellite providers such as HughesNet and Starlink. AT&T and Spectrum provide speeds up to 5 Gbps and 1 Gbps respectively, and both provide coverage for 93 percent of the City. Wireless telecommunications services are provided through regional cellular networks operated by major carriers, including AT&T, Verizon, and T-Mobile (Costa Mesa 2025).

The City also maintains internal telecommunications systems to support municipal operations and emergency services. The City's telecommunications infrastructure includes dispatch and communications systems that support police, fire, paramedic, and other emergency response functions. These systems provide centralized dispatch services and maintain communications equipment used across City departments. (Costa Mesa 2026c)

3.17.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to utilities if it would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas,

or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

METHODOLOGY

Wastewater Generation and Analysis

As recommended and provided by CMSD, the sewer generation factors shown in Table 3.17-5 were used to develop conservative wastewater generation flow rates.

Table 3.17-5 CMSD Sewer Generation Factors

Occupancy Type	Average Daily Flow	Units
Studio Apt/Condo	150	gal/DU
1 Bedroom Apt/Condo	200	gal/DU
2 Bedroom Apt/Condo	250	gal/DU
3+ Bedroom Apt/Condo	300	gal/DU
Commercial Space	150	gal/1,000 sq ft gross floor area

Source: Appendix K.1.
Note: gal/DU = gallons per dwelling unit

The wastewater generation estimates for the proposed project are based on the factors provided in the Infrastructure Report prepared by Fuscoe Engineering (Appendix K.1), which were approved by the CMSD (see Table 3.17-5). As shown in Impact a), these wastewater generation estimates are higher than the project's projected water use (calculated in the Water Supply Assessment prepared by West & Associates Engineering, Inc. in Appendix G.1) because sewer flow factors include conservative capacity assumptions to ensure system reliability and account for potential peak flows. In contrast, water demand factors reported by Mesa Water

District reflect actual indoor water consumption and exclude certain exterior uses that do not generate wastewater. Because these sewer flow factors were provided and approved by CMSD, they were used directly in the project analysis. To ensure a conservative evaluation of environmental impacts, the analysis relies on these higher sewer flow estimates, which may overstate wastewater generation. This approach ensures that the project's potential effects on the wastewater system are not underestimated. The analysis is internally consistent and conservative, and this methodology does not change the overall conclusions regarding wastewater impacts.

3.17.4 Project Impact Analysis

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

WATER

Although the proposed project includes existing water lines from the FDC, the proposed project would require new on-site utility infrastructure to service the proposed project's new land uses. The proposed project would require installation of appropriately sized water pipelines to serve the proposed development.

Construction

Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below the surface and would be limited to on-site water distribution, with minor off-site work associated with connections to the public main. The construction-related environmental impacts associated with these improvements are analyzed throughout this DEIR since it is a component of the proposed project (see for example Section 5.4, *Cultural Resources*). This analysis focuses on whether Mesa Water would need to expand its water facilities to handle the demand generated by the project. As mentioned in the WSA prepared for the proposed project, Mesa Water does not expect to have a water supply shortage during normal, single dry, or multiple dry years over the next 20 years (See Impact (b) below).

Prior to ground disturbance, project contractors would coordinate with Mesa Water to identify the locations and depth of all lines. The project contractor would notify Mesa Water in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Additionally, water needed for construction activities would occur intermittently throughout the construction period, would be temporary in nature, and water required for construction is

generally trucked in. Therefore, construction of the proposed project would not require or result in the relocation or construction of new or expanded water infrastructure, the construction or relocation of which could cause significant environmental effects. Therefore, impacts would be **less than significant.**

Operation

Water service would be provided for both domestic use and fire protection. Prior to issuance of building permits, the final building design, including fire prevention and suppression systems, would be subject to review and approval by Costa Mesa Fire & Rescue to ensure compliance with applicable Fire Code requirements. During the engineering design and plan check process, the City and the water service provider would review the proposed infrastructure improvements to ensure adequate water service and fire flow are available to serve the proposed project. In addition, as mentioned in the WSA, Mesa Water would prepare a will-serve letter confirming its ability to provide water service to the proposed project, which would be issued upon payment of applicable fees by the project applicant.

Furthermore, the proposed project would be required to comply with the water efficiency standards of the California Green Building Standards Code (CALGreen), codified in Part 11 of Title 24 of the California Code of Regulations. The proposed project design would incorporate water-efficient features such as low-flow fixtures, drought-tolerant landscaping, and separate irrigation meters, as required. Compliance with these regulations would reduce overall water demand.

Because the proposed water infrastructure improvements would occur within the project site and would be reviewed through the City's engineering and building permit processes, implementation of these improvements would not result in significant environmental effects. Impacts would **be less than significant.**

WASTEWATER

Using the sewer generation factors (see Table 3.17-5) and peaking factor of 2.5 provided by CMSD, the wastewater generation from the proposed project residential and commercial elements are shown in Table 3.17-6. The proposed project has the potential to add 0.951 MGD of average daily flows and 2.378 MGD of peak flows into the sewer system. The existing on-site sewer system would be removed during construction of the proposed project, and a new on-site sewer system would be installed to accommodate the flows associated with the proposed land uses. The on-site sewer system would continue to discharge to the existing point of connection beneath Fair Drive. The on-site sewer pipelines are anticipated to range from 8- to 12-inch diameter VCP.

Table 3.17-6 Projected Wastewater Generation

Description	Units[1] or Commercial Space	Average Flow (MGD)	Peak Flow (MGD)	Peak Flow (cfs)
Studio Apt/Condo	33 DU	0.005	0.012	0.019
1 Bedroom Apt/Condo	1,674 DU	0.335	0.837	1.295
2 Bedroom Apt/Condo	1,634 DU	0.409	1.021	1.580
3 Bedroom Apt/Condo	619 DU	0.186	0.464	0.718
4 Bedroom Apt/Condo	40 DU	0.012	0.030	0.046
Commercial Space	35,000 SF	0.005	0.013	0.020
Total Project Flows		**0.951**	**2.378**	**3.680**

Source: Appendix K.1.

Note: MGD= million gallons per day, in=inches, cfs=cubic feet per second

The size and type of unit (studio, 1-bedroom, 2-bedroom, etc.) is for planning purposes only and was requested by CMSD. It is subject to change but provides a conservative approach for estimating sewer flows and impact evaluation.

Wastewater generation estimates are based on factors approved by the local sanitary district and may be slightly higher than corresponding water demand values. This approach ensures that potential wastewater impacts are not underestimated. See "Wastewater Generation and Analysis" in the Methodology, above.

1. 4,000 total residential units.

Sewer Capacity Assessment

Using the results of the flow monitoring provided in Table 3.17-3 along with the proposed project land uses, the existing local CMSD sewer system was evaluated to confirm capacity of the existing off-site sewer system and determine if upgrades to any of the existing sewer reaches would be required. The evaluation is based on existing conditions (Table 3.17-3) combined with the projected wastewater generation peak flows (Table 3.17-6). As presented in Table 3.17-6, it is projected that the proposed project would see an estimated proposed peak flow of 2.378 MGD. This peak flow was added to the existing peak flow obtained from the sewer flow monitoring. Based on this capacity assessment, the estimated total peak flow within the 18-inch pipe is projected to flow at 65 percent full (diameter/Depth (d/D) is 0.65). Additionally, the double 15-inch sewer pipes fronting the project site are projected to be 72 percent full (d/D is 0.72) under the buildout condition. Projected flows above the 50 percent full (d/D) threshold exceed the design capacity of an 18-inch pipe (or smaller) in CMSD's Standard Plans and Specifications.

Table 3.17-7, *Proposed Existing and Projected Peak Flows*, provides the results of the capacity assessment.

Table 3.17-7 Proposed Existing and Projected Peak Flows

Peak Q (cfs) (Existing + Projected)	Peak Q (MGD) (Existing + Projected)	Proposed Depth in 18-in Sewer (in)	Proposed Depth in 2-15-inch Sewer (in)	Percent Full (18-inch)	Percent Full (two 15-inch)
6.070	3.923	11.7	9.0	65%	72%

Source: Appendix K.1.

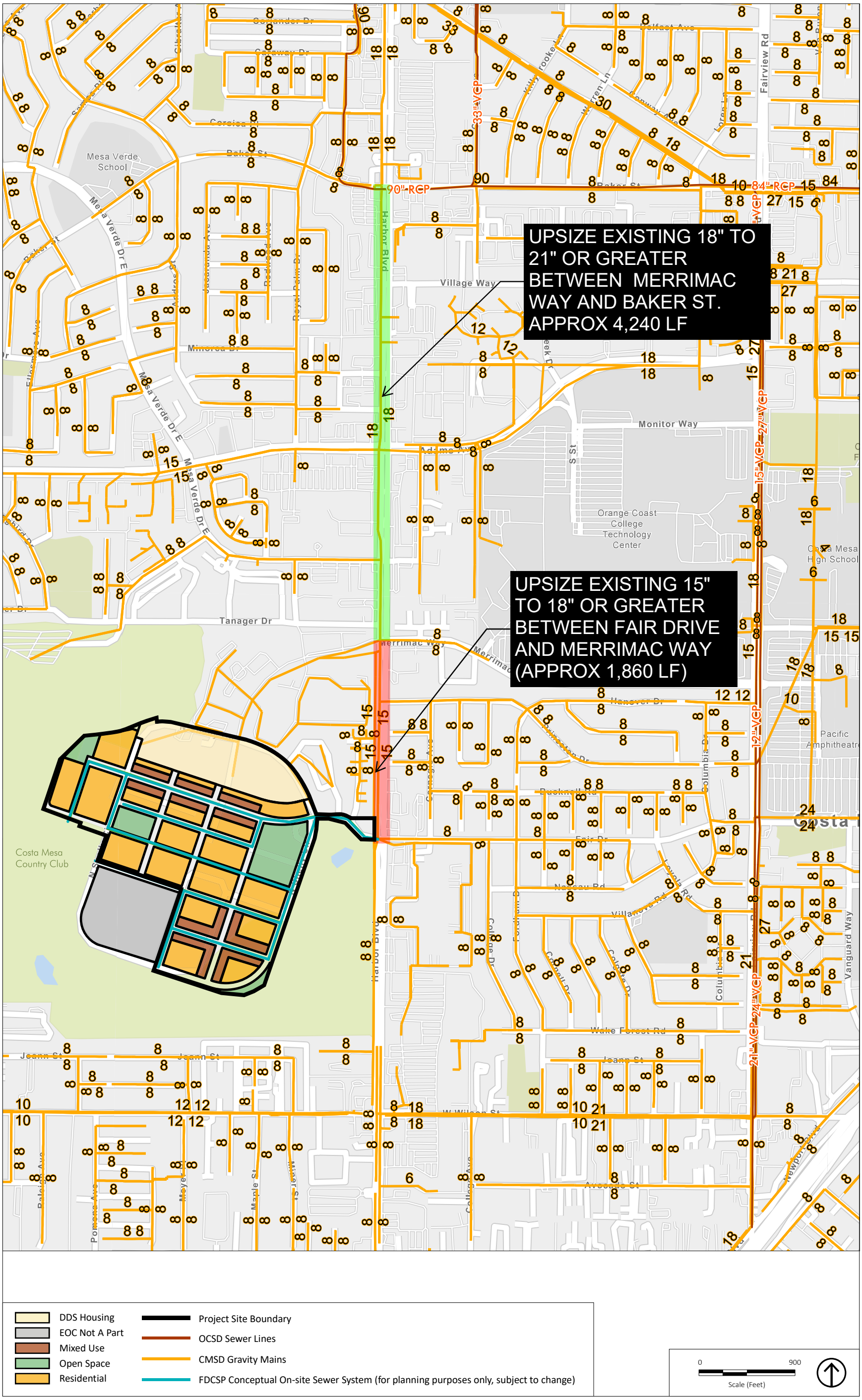
Note: MGD= million gallons per day, in=inches, cfs=cubic feet per second

Based on the results in Table 3.17-7 and the 50 percent d/D threshold, the proposed project would require the following improvements:

- Upsize one of the two parallel existing 15-inch sewer lines from the project's point of connection at Fair Drive to Merrimac Way with an 18-inch line or greater (approximately 1,860 linear feet (LF)).
- Upsize the 18-inch from Merrimac Way to Baker Street to 21 inches or greater (approximately 4,240 LF).
- Total estimated linear feet of sewer replacement or upsizing is 6,100 LF.
- Further evaluation and analysis in coordination with CMSD would be required to determine final sizing and cost sharing responsibilities

Figure 3.17-4, *Proposed Sewer Facilities*, shows the proposed sewer improvements for the proposed project.

In regard to wastewater treatment, the OCSD provided a Sewer Capacity Verification letter, dated December 29, 2025, that includes certification from OCSD that there is sufficient capacity in its facilities to accept the estimated wastewater flows associated with the proposed project as conveyed to OCSD by the local CMSD sewer system. Included in the Sewer Capacity Verification letter is the statement that OCSD would like to reevaluate the impacts to the OCSD facilities if the quantity and/or quality of discharge changes in the future from the estimates provided in the Infrastructure Report (Appendix K.1).



Source: FUSCOE 2026.

Figure 3.17-4
Proposed Sewer Facilities

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In summary, development of proposed land uses within the FDCSP would require removal of the existing sewer system on-site and the construction of a new sewer system on-site to support the proposed land uses. In addition, upgrades would also be required to existing sewer infrastructure in the public right-of-way to accommodate the increased wastewater flows. As noted, approximately 6,100 LF of new or parallel sewer lines within Harbor Boulevard from Fair Drive to Baker Street are required to accommodate the full buildout of the proposed land use. This includes approximately 1,860 LF of 18-inch or greater in Harbor Boulevard for the 15-inch line between Fair Drive and Merrimac Way and approximately 4,240 LF of 21 inches or greater for the 18-inch line in Harbor Boulevard between Merrimac Way and Baker Street. The final size, timing, and alignment of the proposed sewer line improvements would be based on the approved site plan, phasing, and coordination with CMSD. All project applicants are required to submit detailed information to CMSD regarding product type, size, number of units or square feet, projected demands (indoor and outdoor), and other project details so impacts on the existing sewer system can be managed properly. In those conditions, where hydraulic or capacity impacts affect other service areas or users within CMSD service area, the developer is responsible for paying for the impacts through their connection fees.

The construction of the on-site and off-site sewer lines and associated improvements would primarily include trenching for the pipelines. All construction would be performed in accordance with the Construction General Permit and all associated requirements. Any work that may affect services to the existing sewer lines would be coordinated with the City and CMSD. Moreover, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short duration and would cease once the installation is complete. Therefore, the proposed project impacts on wastewater associated with construction activities would be **less than significant.**

Significance without Mitigation: Less than significant.

STORMWATER INFRASTRUCTURE

The existing on-site drainage system would be demolished during construction of the proposed project, and a new on-site storm drain system would be installed to accommodate the drainage associated with construction of the proposed project's land uses. The on-site storm drain system would continue to discharge to the existing 36-inch storm drain system that continues through the golf course with the following measures to manage flows to existing conditions:

- Condition analysis (CCTV) of the existing 36-inch storm drain that accepts drainage from the project site.
- Replacement of the CMP portion of the storm drain with RCP.
- Realign the 36-inch RCP storm drain to avoid the lake.
- Determine capacity of the existing 36-inch storm drain.

- Proposed condition 25-year peak flow to match existing 25-year peak flow including on-site detention if necessary.
- Prepare detailed hydrology & hydraulics report for City review and approval based on the approved site plan.

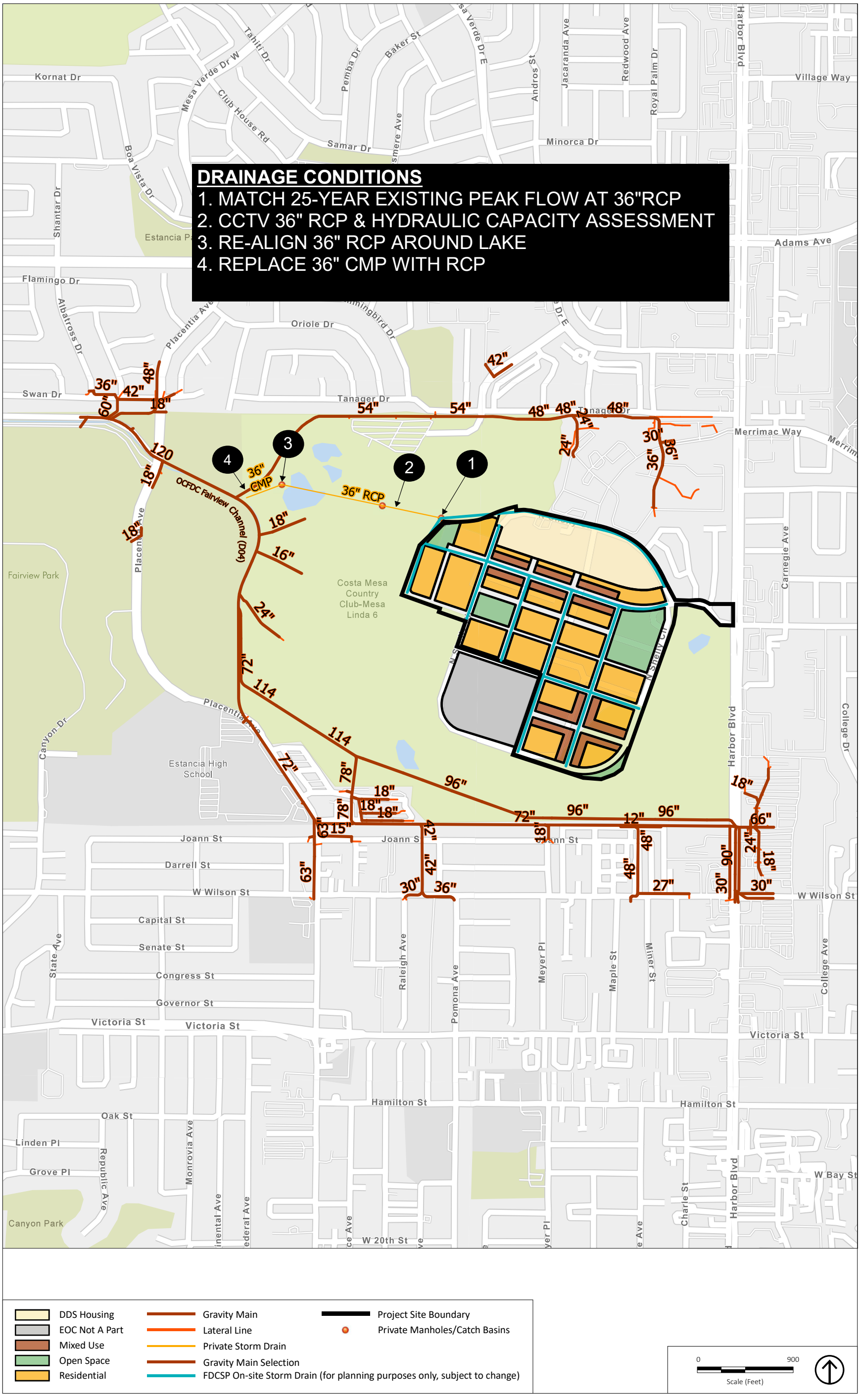
Figure 3.17-5, *Proposed Storm Drain Facilities*, shows the proposed drainage facilities for the proposed project.

A hydrologic analysis of the project site would be prepared, along with a hydraulic analysis of the existing 36-inch storm drain that conveys the drainage through the golf course. The existing 25-year peak flow would be the design storm for which the proposed condition peak flow must match. If the proposed condition 25-year peak flow exceeds the existing condition, on-site detention would be required to attenuate peak flows to match existing condition 25-year peak flows. This would ensure that development of the proposed project would not increase peak flows to the golf course compared to existing conditions. As part of the analyses, a hydraulic evaluation would be made to determine the maximum allowable peak flow for the 36-inch RCP in accordance with local drainage criteria. If the maximum allowable peak flow is less than the 25-year existing peak flow, additional on-site detention would be required to match the allowable peak flow rate. Based on the current project site conditions and approved design storm event in the county flood control hydrology report, using the 25-year storm event as the basis for design is applicable.

It is recommended that the downstream CMP section be replaced with RCP of the same size (36-inch). Additionally, there is an option to either allow the flows to discharge prior to the existing 42-inch culvert into the Fairview Channel or install a new connection to the channel. However, a new connection to the channel would require obtaining permits from OCFCD. This decision would be made by the master developer in coordination with the City and OCFCD. The City of Costa Mesa Public Works' Maintenance Division is responsible for the maintenance and upkeep of the City's public drainage facilities. It is anticipated that the portions of proposed storm drain system would be owned and maintained by the City, and therefore all City storm drain design standards would be followed.

In summary, the proposed project would replace the existing on-site drainage system with a new storm drain system designed to maintain existing 25-year peak flow conditions through hydrologic and hydraulic analyses, potential on-site detention, and improvements to the existing 36-inch storm drain. These measures would ensure that runoff from the project site does not increase peak flows to downstream facilities and that the system complies with City drainage standards. Therefore, impacts related to stormwater infrastructure would be **less than significant.**

Significance without Mitigation: Less than significant.



Source: FUSCOE 2026.

Figure 3.17-5
Proposed Storm Drain Facilities

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ENERGY INFRASTRUCTURE

The proposed project would no longer rely on the central plant for electricity and would require all new on-site infrastructure. As part of the demolition plan, the central plan would be removed along with all other utilities. None of the existing utilities on-site are feasible to keep but require replacement with modernized infrastructure that meets current code requirements. Table 3.17-8, *Electrical Usage for the Proposed Project*, shows the planning level estimate of the future demand for full buildout with and without electric vehicles (EV).

Table 3.17-8 Electrical Usage for the Proposed Project

Land Use	KW	KVA	AMPS
WITH EV			
Condominium/Multifamily Apartments	22,167.6	24,630.7	68,418.5
Senior Affordable/Permanent Supportive	3,600	4,000	11,111
Condominium/ Multifamily Apartments	4,968	5,520	15,333.3
Townhomes	1,353.6	1,504	4,177.8
State Housing Townhome/Condos	4,512	5,013.3	13,925.9
Total Demand	36,601.2	40,668	112,966.7
WITHOUT EV			
Condominium/Multifamily Apartments	7,064.4	7,849.3	2,1803.7
Senior Affordable/Permanent Supportive	800	888.9	2,469.1
Condominium/ Multifamily Apartments	1,566	1,740	4,833.3
Townhomes	446.4	496	1,377.8
State Housing Townhome/Condos	1,488	1,653.3	4,592.6
Total Demand	**11,364.8**	**12,627.6**	**35,076.5**

Source: Appendix K.2.

Note: kW=kilowatts, kVA=kilovolt-amperes, Amps =amperes, EV = electric vehicles

Southern California Edison (SCE) would install typical facilities as needed around the property (e.g., outdoor switches, transformers, and services). SCE previously confirmed that they have capacity in the local area for some redevelopment, but off-site infrastructure would likely be required to support the full buildout. Points of connection from SCE and the need for a looping system and/or multiple circuits would be identified in the Engineering Analysis Report (EAR). The EAR would provide a current assessment of how much power is currently available for the proposed project and identify what new infrastructure would be required to energize the entire proposed project. The report would also identify how long it will take to build the new infrastructure if needed. Depending on SCE's EAR study, SCE may decide to feed the new

development from the same source on Merrimac Way or from the nearby vault on Harbor Blvd or from both locations.

Natural gas was also served by the utility at the central plant. The Southern California Gas Company (SoCalGas) would remove these facilities and provide a typical system with mains in the streets and each building with an individual service if needed. The new gas system would connect to the existing high-pressure distribution system beneath Harbor Boulevard adjacent to the project site.

Although the proposed project would necessitate the construction of new on-site and potentially off-site electric and natural gas facilities, these facilities are typical urban utility improvements (transformers, distribution lines, street mains, service connections) that are routinely installed in residential and commercial developments. The installation and routing of these systems is standard practice, and construction would occur within existing streets and utility easements. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

OTHER UTILITIES

As mentioned in Section 3.17.2, approximately 93 percent of households in Costa Mesa have broadband internet subscriptions, indicating widespread access to telecommunications services in the City. Broadband availability generally meets or exceeds State service standards, and multiple providers offer service within the jurisdiction, ensuring adequate capacity and competition among providers. Development projects in Costa Mesa typically connect to existing telecommunications infrastructure within adjacent rights-of-way. New development of the proposed project would be served by extending existing lines or installing new telecommunications facilities as needed to connect to provider networks. Installation and operation of telecommunications infrastructure would be in accordance with applicable local regulations and service provider requirements. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

A Water Supply Assessment (WSA) is mandated by State law by Public Resource Code Section 21080, SB 610, Water Code Section 10910 et seq., and Senate Bill 221 (SB 221), Government Code Section 66473.7, for any project that falls within one of 7 categories of “projects” as defined under Water Code Section 10912. This code includes residential sites with more than 500 dwelling units, which applies to the proposed project. The WSA was prepared by West &

Associates and is available in Appendix G.1 of this DEIR. The results of the WSA are provided herein.

Table 3.17-9, *Proposed Project Water Demand*, presents the average and maximum water demand for the proposed project as well as the water demand factors used to determine the demand by the area or dwelling unit of each respective land use. As shown in Table 3.17-9, the proposed project's ADD is estimated to be 765,967 GPD or 862 AFY.

Table 3.17-9 Proposed Project Water Demand

Land Use	WDF (GPD/acre)	WDF (GPD/DU)	DU	Area (acre)	ADD		MDD	
					GPD	AFY	GPD	AFY
Open Space Irrigation	2,400			18.3	43,959	51	109,897	128
General Commercial	2,500			0.8	2,009	3	3,013	5
Low Density Residential	-	180	144	6	25,920	30	38,880	45
High-Density Residential	-	180	3,856	54	694,080	778	1,041,120	1,167
Total Development	**-**		**4,000**	**79.1**	**765,967**	**862**	**1,192,910**	**1,345**

Source: Appendix G.1.

Note: WDF= water demand factor; GPD= gallons per day; DU= dwelling unit; AFY= acre feet per year; ADD = average day water demand; MDD=maximum day water demand; gpm= gallons per minute

The 2020 UWMP determined that "Mesa Water is projected to meet full-service demands through 2045 for the same scenarios." However, because the proposed project's water demand was not included in the 2020 UWMP, the WSA included an evaluation of Mesa Water's water supply with project development to determine if Mesa Water would have adequate water supply in future years to accommodate the proposed project. Table 3.17-10, *Normal, Single Dry, and Multiple Dry Year Supply and Demand for the Proposed Project (AFY)*, provides the results of Mesa Water's projected supply and demand with development of the proposed project.

Table 3.17-10 Normal, Single Dry, and Multiple Dry Year Supply and Demand for the Proposed Project (AFY)

Scenario	2025	2030	2035	2040	2045
Normal Year					
Supply Totals	17,555	19,273	19,817	20,377	20,937
Demand Totals	17,555	19,273	19,817	20,377	20,937
Single Dry Year					
Supply Totals	18,784	20,622	21,204	21,803	22,403
Demand Totals	18,784	20,622	21,204	21,803	22,403
Multiple Dry Year [1]					
Supply Totals	17,687	21,262	23,186	23,841	24,496
Demand Totals	17,687	21,262	23,186	23,841	24,496

Source: Appendix G.1.

Note: AFY= acre-feet per year.

1. Multiple Dry Years starts in 2026.

Based on the information in Table 3.17-1 and Table 3.17-10, Mesa Water can expect to meet future demands for all climate conditions through 2045, including the proposed project. Additionally, Mesa Water will prepare a "Will-Serve Letter" upon payment of all development fees, which will declare that Mesa Water will provide water service connections to the proposed project. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The proposed project is expected to result in an increase in the peak wastewater flows of approximately 2.378 MGD and average flow of 0.951 MGD. OCSD's Plant No. 1, which would serve the proposed project, has a treatment capacity of 185 MGD and an average daily inflow of 116 MGD. Therefore, the residual treatment capacity is 69 MGD for OCSD Plant No. 1. Since projected peak wastewater flows from the project would be less than 4 percent of the residual capacity of Plant No. 1, the treatment facility remains capable of accommodating the projected increase in sewer flows. Additionally, OCSD issued a Sewer Capacity Verification letter for the project stating that there is sufficient treatment capacity in its facilities to accept the estimated wastewater flows generated by the proposed project. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The proposed project would result in an increase in population of 9,926 residents and 74 employees (see Table 2-3, *FDCSP Buildout*, in Chapter 2, *Project Description*). This increase in population and employment would result in more solid waste generation and could impact the capacity of the receiving landfills. Table 3.17-11, *Proposed Project Solid Waste Generation*, provides an estimate of the amount of solid waste that would be generated under the proposed project.

Table 3.17-11 Proposed Project Solid Waste Generation

	Residents	Employees
Proposed Project Increase in Residents and Employees	9,926	74
Per capita waste generation rate (PPD)	7.3	9.5
Waste Generation (PPD)	72,460	703
Waste Generation (TPY)	13,224	128

Source: CalRecycle 2026b.

Note: PPD = pounds per day; TPY = tons per year

As shown in this table, buildout of the proposed project would generate an additional 13,224 tons per year (TPY) of solid waste from residents and 128 TPY from employees. This would result in a total net increase of 13,352 TPY, which equates to a disposal rate of approximately 43 tons per day (TPD) (assuming 312 disposal days per year).

As provided in Table 3.17-11, the excess daily capacity of the Frank R. Bowerman Sanitary Landfill, which accepts approximately 70 percent of the City's solid landfilled waste, is 3,790 TPD. Therefore, this landfill can accommodate the additional 43 TPD from the proposed project. Additionally, approximately 30 percent of this waste would be distributed to other landfills that accept solid waste from the City. These calculations also conservatively assume no diversion of materials for recycling and composting.

Furthermore, future development pursuant to the proposed project would comply with the 2025 CALGreen code, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Development would also comply with AB 341, which mandates recycling for commercial and multifamily residential land uses. And future businesses that generate organic waste in

amounts over a certain threshold would be mandated to recycle organic matter in accordance with AB 1826.

With continued compliance with the applicable regulations leading to increased recycling and waste diversion, anticipated rates of solid waste disposal from the proposed project would be **less than significant.**

Significance without Mitigation: Less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations governing solid waste disposal. For example, the proposed project would comply with the following federal, state, and local laws and regulations that govern solid waste disposal:

- **The Resource Conservation and Recovery Act of 1976** and the Solid Waste Disposal Act of 1965, which govern solid waste disposal.
- **AB 939** (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.), which required diversion of 50 percent of waste from landfills and required each county to provide landfill capacity for a 15-year period.
- **AB 1327** (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

In addition, as shown in Impact d) above, the proposed project's solid waste is adequately accommodated within area landfills serving the project site. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.17.5 Cumulative Impact Analysis

The geographic context for the cumulative impact analysis varies by resource type. For water supply, the analysis focuses on the Mesa Water service area, while sewer infrastructure is considered within the CMSD service area. Stormwater infrastructure is evaluated in the context of the City of Costa Mesa, and solid waste impacts are considered within the areas served by the Frank R. Bowerman Sanitary Landfill. Energy infrastructure is analyzed within the SCE

service area, natural gas within SCG's service area, and telecommunications impacts are evaluated within the applicable service provider's network.

Would the project have a cumulative effect related to utilities and service systems?

Water

Mesa Water is required to prepare and update its UWMP every five years to plan and provide water supplies to serve existing and projected demands over a 20-year horizon. The WSA prepared for the project indicated that with project development, Mesa Water will still have the capability to serve all of the water retailers within its service area with sufficient water supplies during normal conditions as well as single-dry years and multiple-dry years. The types of projects that are subject to the WSA requirements of SB 610 tend to be larger projects that may or may not have been included in the growth projections of the UWMP. The water supply assessment for such projects would evaluate the quality and reliability of existing and projected water supplies as well as alternative sources of water supply and measures to secure alternative sources if needed. Compliance with regulatory requirements that promote water conservation, such as a Water Shortage Contingency Plan, the requirements of CALGreen and the City's Water Efficient Landscape Ordinance, and implementation of other water saving strategies would assist in ensuring that adequate water supply is available on a cumulative basis. Therefore, it is anticipated that Mesa Water would be able to supply the demands of the proposed project and future growth through 2045 and beyond. Therefore, cumulative impacts on the water supply would be **less than significant.**

Significance without Mitigation: Less than significant.

Wastewater

Implementation of the proposed project is expected to increase peak wastewater flow rates by 2.378 MGD. The OCSD Plant No. 1 currently has a residual treatment capacity of 69 MGD. Therefore, the proposed project would not exceed the capacity of Plant No. 1. Additionally, wastewater generation for the proposed project is based on factors approved by CMSD and incorporates conservative assumptions to ensure system reliability. These factors are slightly higher than water demand estimates because water supply calculations generally exclude exterior uses that do not enter the sewer system. This conservative approach ensures that cumulative impacts on wastewater infrastructure are not underestimated.

Future development in the CMSD service area would be required to comply with all applicable regulations and ordinances. Project applicants would be required to pay wastewater connection fees and annual sewer service charges for residents or monthly service charges for non-residential development. These fees would fund continued improvements to the wastewater collection and treatment system.

Therefore, with continued compliance with applicable regulations and future reductions in wastewater demands with water conservation efforts, cumulative development would not exceed wastewater collection or treatment capacities. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

Stormwater Infrastructure

Cumulative projects in the City could increase impervious surfaces and local runoff volumes. However, projects are required to capture and infiltrate runoff per the regional NPDES MS4 permit. Compliance with the MS4 permit ensures on-site retention of runoff from design storm events, and the LID Standards Manual provides guidance for stormwater quality control measures. These measures minimize the potential for exceedance of drainage system capacity. No significant cumulative drainage impact would occur, and the proposed project's impacts would not be cumulatively considerable. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

Solid Waste

As mentioned in Section 3.17.2, multiple landfills service the City of Costa Mesa; however, majority of solid waste goes to Frank R. Bowerman Sanitary Landfill. Collectively, these landfills would be able to service projects in Costa Mesa. Cumulative projects would comply with CALGreen construction waste diversion requirements. State mandates, including AB 939, AB 341, AB 1826, and SB 1383, require expanded recycling, organics diversion, and waste reduction programs that are expected to decrease the amount of waste disposed of in landfills over time. Given the availability of landfill capacity, the regional nature of solid waste management, and continued compliance with applicable federal, State, and local regulations, the proposed project's incremental contribution to cumulative solid waste impacts would not be considerable. Therefore, cumulative solid waste impacts would be **less than significant.**

Significance without Mitigation: Less than significant.

Energy Infrastructure

Cumulative energy demand would primarily be served by SCE and SoCalGas. The proposed project would require new or expanded on-site and off-site electrical infrastructure to meet demand; however, these improvements are typical urban utility upgrades, designed to minimize environmental effects. All future projects developed within the SCE and SoCalGas service areas would implement the requirements of the California Energy Code and CALGreen Building Code. New buildings would also use new energy-efficient appliances and equipment, pursuant to the Appliance Efficiency Regulations. Counties and cities review project design plans against these codes and ensure compliance before issuing construction permits. These measures would

reduce the overall consumption of electricity and natural gas. Cumulative projects in the SCE or SoCalGas service areas would similarly undergo individual CEQA review to ensure adequate infrastructure and mitigate potential impacts. Therefore, cumulative impacts on energy infrastructure, including SREOC facilities, would be **less than significant.**

Significance without Mitigation: Less than significant.

Other Utilities

Similar to the proposed project, future development would install infrastructure supporting telecommunications in accordance with City requirements. Given the urbanized character of the City, new conveyance facilities would not significantly alter land use patterns or require unusual construction. Therefore, cumulative impacts from other utilities would be less than significant, and the proposed project's impacts would not be cumulatively considerable. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

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4. ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

This chapter presents the alternatives analysis for the proposed project, as required by the California Environmental Quality Act (CEQA). CEQA requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives" (CEQA Guidelines Sec. 15126.6[a]).

The discussion includes an explanation of the methodology used to select alternatives to the proposed project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the proposed project while still meeting most of the basic project objectives, pursuant to CEQA Guidelines Section 15126.6(a). This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated with respect to minimizing adverse environmental effects as compared to the proposed project. It also describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration and the reasons for their elimination. For the alternatives selected for analysis, this chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the proposed project. Finally, as required under CEQA Guidelines Section 15126.6(e), based on this analysis, this chapter then discusses the Environmentally Superior Alternative.

The discussion in this chapter is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. Section 15126.6, "Consideration and Discussion of Alternatives to the Proposed Project," of the CEQA Guidelines states that:

> An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for

> selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (sec. 15126.6[a])

4.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR. The primary factors considered when determining feasible alternatives to the proposed project are the identified project objectives and the significant impacts that have been identified for the proposed project.

4.2.1 Project Objectives

Chapter 2, Section 2.5, *Statement of Project Objectives*, lists the objectives that have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

4.2.2 Significant Impacts

Apart from the No Project Alternative, alternatives to a project should be evaluated because of their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's identified significant impacts. The proposed project would result in 20 potentially significant impacts.

LESS-THAN-SIGNIFICANT IMPACTS WITH MITIGATION

The following impacts were found to be less than significant with implementation of mitigation measures.

- **Impact BIO-1:** Construction of the project site may impact suitable habitat for the Crotch's bumble bee and the western burrowing owl; suitable nesting habitat for the Cooper's hawk and white-tailed kite; and suitable roosting habitat for the western yellow bat and monarch butterfly.
- **Impact BIO-3:** The construction phase of the proposed project could impact nesting native and migratory birds and raptors at the project site.
- **Impact CUL-2:** The proposed project has a moderate to low potential in uncovering pre-contact resources during construction.

- **Impact CUL-3:** The proposed project has the potential in uncovering cultural resources during construction.
- **Impact GEO-1:** Construction of the proposed project could encounter unique paleontological resources during ground-disturbing activities.
- **Impact HAZ-1:** The construction phase of the proposed project would create a potentially significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- **Impact HAZ-2:** The construction phase of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset or accidental release of hazardous materials.
- **Impact HAZ-3:** Temporary off-site construction activities along Harbor Boulevard, an established evacuation route, could impair emergency response or evacuation access.
- **Impact NOI-1:** The proposed project could result in significant temporary increases in noise associated with construction activities.
- **Impact T-1:** Temporary off-site construction activities on Harbor Boulevard could interfere with emergency response and evacuations.
- **Impact TCR-1:** Implementation of the proposed project could result in a substantial adverse change to unknown TCRs during ground-disturbing activities.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following impacts were found to be significant and unavoidable even with implementation of mitigation measures.

- **Impact AIR-1:** The proposed project would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the South Coast AQMD's AQMP.
- **Impact AIR-2:** Construction activities associated with future development that would be accommodated under the proposed project could generate short-term emissions in exceedance of the South Coast AQMD's threshold criteria.
- **Impact AIR-3:** Long-term operation of the proposed project would generate emissions in exceedance of the South Coast AQMD's threshold criteria and cumulatively contribute to the South Coast Air Basin's nonattainment designations.
- **Impact AIR-4:** Construction of the proposed project could expose sensitive receptors to substantial pollutant concentrations.
- **Impact AIR-5:** The proposed project's contribution to cumulative air quality impacts would be cumulatively considerable.
- **Impact BIO-2:** Construction and operation of the proposed project may have an impact on an unknown aquatic resource (potential wetland).

- **Impact CUL-1:** The proposed project would result in a substantial adverse change in the significance of a historical resource due to the removal of historic buildings within the Fairview Developmental Center.
- **Impact GHG-1:** Operation of the proposed project would generate a cumulatively considerable increase in GHG emissions that would exceed the South Coast AQMD Working Group bright-line threshold.
- **Impact GHG-2:** The proposed project, together with cumulative projects, would result in substantial GHG emissions impacts.

4.3 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines section 15126.6(c) requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. CEQA Guidelines section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. Following is a discussion of alternatives considered and rejected, along with the reasons that alternative was not included in the analysis.

4.3.1 Alternative Site

CEQA requires that the discussion of alternatives focus on alternatives to alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]).

An alternative location to the project site could avoid impacts associated with the removal or alteration of buildings that contribute to the FDC Historic District. However, no feasible alternative site has been identified that could accommodate development on a similar scale while meeting the proposed project objectives and addressing the City's housing needs. The City's 6th Cycle Housing Element identifies the FDC property as a key opportunity site capable of accommodating a minimum of 2,300 residential units, including units that would help meet the City's Regional Housing Needs Allocation (RHNA). While other opportunity sites are identified in the Housing Element, the FDC property is the largest listed site and one of the few capable of accommodating development at the scale proposed. Because of the project site's suitability,

characteristics, redevelopment goals, and size, an alternative project location would not be a feasible alternative to meet the proposed project's objectives. Accordingly, an alternative site is considered infeasible and is rejected from further analysis.

4.3.2 Reduced Density Below Housing Element Alternative

This alternative assumes the FDCSP would allow a lower maximum number of residential units than the proposed project (4,000 units) and the Housing Element (2,300 units). Under this alternative, the project site would still be redeveloped with residential and mixed-use development but at a reduced density below the Housing Element. The reduced density would decrease the number of housing units below 2,300 units, also decreasing population on the project site while maintaining similar development patterns and land uses.

Reducing the number of housing units would result in the reduction of population-related impacts, such as vehicle trips, water demand, wastewater generation, and operational greenhouse gas emissions. However, because the project site would still be developed, this alternative would not reduce impacts related to the physical development footprint, including impacts associated with site disturbance or impacts to historical resources. As a result, many environmental impacts associated with redevelopment of the project site would remain similar to those of the proposed project.

In addition, State housing law limits the use of reduced residential density as a mitigation measure or project alternative. Public Resources Code Section 21159.26 provides that for projects that include housing development, a public agency may not reduce the proposed number of housing units as a mitigation measure or project alternative if another feasible mitigation measure or alternative would provide a comparable level of environmental impact reduction. In addition, as mentioned above, the City's 6th Cycle Housing Element identifies the FDC property as a key Housing Element site capable of accommodating residential units and helping the City meet its RHNA.

Because the FDC site is identified in the City's Housing Element as a key site to accommodate future housing development, reducing the allowable residential density below what is identified in the Housing Element would conflict with the City's ability to meet its RHNA obligations. For these reasons, the Reduced Density Below Housing Element Alternative would not meet key proposed project objectives related to providing housing and implementing the City's Housing Element and State housing directives for the project site. Therefore, this alternative is considered infeasible and is rejected from further analysis.

4.3.3 Full Adaptive Reuse Alternative

The Full Adaptive Reuse Alternative assumes that all existing buildings and project site features within the FDC property would be retained and adaptively reused, with no demolition of existing structures or the walkways connecting them. Under this alternative, redevelopment of the project site would be limited to rehabilitation and reuse of the existing building stock to accommodate the proposed project's land uses. No buildings or substantial new construction would occur beyond modifications necessary to retrofit existing structures for occupancy and to meet applicable building and safety codes.

This alternative would prioritize preservation of the historic character of the FDC district by maintaining the existing building inventory and site layout. The Fairview State Hospital Historic District comprises 39 buildings and structures, of which 36 are identified as contributors to the district's cultural significance. In addition, various landscape features contribute to the district's historic character. While the individual buildings and landscape elements are not independently significant, their collective presence and integrity establish the historic significance of the district as a whole. Since the majority of the buildings on the project site contribute to the FDC Historic District, retaining and reusing all existing structures could reduce or avoid impacts associated with the demolition. However, a significant impact would still occur from alteration of historic resources because modifications to facilitate adaptive reuse, including structural upgrades, seismic retrofitting, and compliance with building and safety codes, could result in changes in the physical characteristics that convey the historical significance of contributing resources. Therefore, impacts on historical resources would be reduced but not to a less than significant level under this alternative.

This alternative would also face feasibility constraints due to the presence of hazardous materials associated with prior site uses. As described in Section 3.8, *Hazards and Hazardous Materials*, identified contaminants include PCBs in electrical equipment and vaults, residual petroleum from historical fuel storage, asbestos-containing materials, lead-based paint, and contaminated soil. As shown in Figure 3.8-1, *REC, HREC, and OEF Locations*, and Figure 3.8-2, *Main Campus Investigation Location*, these conditions are dispersed throughout the project site rather than concentrated in a single location. Given the widespread distribution of hazardous materials, existing buildings would require remediation, abatement, and, in some cases, structural upgrades to address contamination and meet current health and safety standards prior to occupancy. In some instances, the level of contamination or physical deterioration would make rehabilitation infeasible. Therefore, retaining and adaptively reusing all existing buildings may not be physically practicable due to safety and remediation constraints.

In addition, the existing buildings at the project site were originally designed for institutional purposes related to the former FDC and are low density and not suited for modern residential development. The project site includes administrative, educational, recreational, and dormitory buildings, a central power plant, a laundry facility, and an institutional kitchen with an attached

warehouse. Even with rehabilitation, these buildings would not accommodate the planned number of housing units for the proposed project but would necessitate demolition of buildings to reach the residential capacity. Furthermore, preserving all current structures would impede the implementation of a comprehensive framework for land use, circulation, open space, and urban design, which aims to develop a cohesive, walkable, mixed-use neighborhood that integrates open space and community amenities. Therefore, restricting development to only adaptive reuse does not align with the planning goals for the project site under the City's General Plan.

For these reasons, the Full Adaptive Reuse Alternative would not meet key proposed project objectives related to housing production, site planning, and implementation of the FDCSP. In addition, physical constraints related to hazardous materials may limit the feasibility of rehabilitating all existing structures. Accordingly, this alternative is considered infeasible and is rejected from further analysis.

4.3.4 Increased Parkland Alternative

This alternative would allow for a significant increase in parkland within the project site as part of the FDCSP. The proposed project includes a minimum of 14 acres of public open spaces (see Figure 2-5, *Conceptual Land Use Plan*). Typically, residential projects increase the demand for park and recreational facilities. As discussed in Section 5.12, *Population and Housing*, the proposed project would include up to 4,000 dwelling units. Development of 4,000 dwelling units is expected to induce population growth by approximately 9,926 people.

The City’s parkland standard is 4.26 acres per 1,000 residents for new development. Therefore, the proposed increase in residents would require 42.28 acres of parkland on the 95-acre project site (44.5 percent of the total land area). However, to accommodate 28 additional acres of park on-site, in addition to the current minimum of 14 acres of parkland, it would require a substantial reduction in developable area, resulting in decreased building footprints and overall project site coverage for residential land uses. Though increased building heights could theoretically offset this reduction, constraints limit the feasibility of doing this. These include height restrictions associated with the nearby SREOC radio tower and the need to maintain compatibility with surrounding land uses. As a result, accommodating the additional parkland would reduce overall development capacity, including the number of housing units (4,000 units) that could be provided by the project site.

For these reasons, the Increased Parkland Alternative that would allocate over 44 percent of the land area for parkland would not meet key proposed project objectives related to providing housing. Therefore, this alternative is considered infeasible and is rejected from further analysis.

4.3.5 Removal of Secondary Access Point

An alternative that would eliminate the Harbor Boulevard/Proposed Secondary Access-Harbor Center intersection was considered. However, this alternative is infeasible because the secondary access is required for the 4,000-unit development under the California Fire Code (CFC, Title 24, Part 9, Appendix D, Section D106.2), which states that projects with more than 200 dwelling units require two separate and approved fire apparatus access roads, regardless of whether a sprinkler system is provided.

Eliminating the secondary access would create a safety deficiency and would be inconsistent with state fire safety regulations. Alternative locations for the secondary access road were also considered, including potential connections via Merrimac Way and the use or expansion of existing maintenance roads through the golf course. These options were determined to be infeasible due to a combination of factors, including geometric constraints, right-of-way limitations, and potential conflicts with existing residential neighborhoods at Harbor Village Apartments.

Although this alternative could reduce footprint-related impacts on the project site by reducing ground disturbance, any reductions in biological or cultural resource impacts would be minor because the golf course is already developed and the disturbance related to the secondary access is limited (approximately 2 acres). This alternative would not eliminate mitigation measures for hazards or transportation, since temporary construction activities could still cause impacts on Harbor Boulevard, which is a designated evacuation route. In addition, this alternative would not reduce impacts that have been determined to be significant and unavoidable, including air quality, greenhouse gases, and cultural (historical) resources. Therefore, this alternative was considered but rejected from further analysis due to infeasibility based on safety, regulatory requirements, and its inability to reduce environmental impacts.

4.4 ALTERNATIVES SELECTED FOR ANALYSIS

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the objectives of the proposed project and that may avoid or substantially lessen any of the significant impacts of the proposed project.

- Alternative 1: No Project/ No Development
- Alternative 2: No Project Alternative
- Alternative 3: Partial Adaptive Reuse of Historic District

4.5 ALTERNATIVE 1: NO PROJECT/ NO DEVELOPMENT

CEQA Guidelines Section 15126.6(e) requires evaluation of a "No Project" Alternative. [1] Under the No Project/ No Development Alternative, the proposed project would not be approved, and the project site would remain in its current condition under State ownership. The project site is currently owned by the California Department of General Services (DGS) and the Department of Developmental Services (DDS). The proposed project includes General Plan and zoning amendments to establish a Specific Plan framework that would facilitate the State's disposition of the property. In the absence of project approval, these changes would not occur. This alternative assumes that the State would not proceed with the disposition process, including selection of a Master Developer or transfer or lease of the property for redevelopment.

The project site would remain subject to the existing Costa Mesa General Plan land use designations and zoning regulations, as shown in Table 4-1, *Project Site's General Plan Land Use and Zoning*. The FDCSP would not be adopted, and no residential, commercial, or supporting infrastructure improvements associated with the proposed project would be constructed. Existing buildings, circulation features, and landscape elements on the project site would remain in place.

Table 4-1 Current General Plan Land Use and Zoning

Project Site Area	General Plan Designation	Zoning	Development standards[1]
FDC (approx. 93 acres)	Multi-Use Center (MUC)	Institutional and Recreation-Multi-Use (I&R-MLT)	Residential density: 6–40 du/ac; Nonresidential FAR: up to 0.25; Minimum 25% open space; Zoning allows up to 582 dwelling units)
Fair Drive Parcel (approx. 2 acres)	Medium Density Residential	Planned Development Residential-High Density (PDR-HD)	Residential density: up to 12 du/ac (General Plan); Zoning allows residential development at 20+ du/ac

[1] Pursuant to CEQA Guidelines Sections 15125 and 15126.6(e), The No Project Alternative, as defined by CEQA Guidelines, differs from the environmental baseline, which represents existing conditions at project initiation. While the baseline serves as a reference for assessing environmental impacts, the No Project Alternative outlines anticipated future conditions if the project is not approved, allowing for a comparison of outcomes between project approval and non-approval. Typically, this alternative implies that the site will remain unchanged unless other foreseeable actions are anticipated. In this instance, the baseline includes the current state of the site, specifically the vacant Fairview Developmental Center campus, under State ownership. The No Project/No Development Alternative assumes that proposed amendments will not be approved and that the property would not be developed, leading to the continuation of these existing conditions into the future.

Notes: dwelling unit per acre=du/ac; floor to area ratio = FAR

1. A developer could exceed standard development density, as identified in Housing Element Program 3B: Fairview Development Center—State Property.

Because the project site is no longer used for its original institutional purpose and is not anticipated to be reoccupied for such uses, the property would likely remain vacant and underutilized. Over time, existing structures and site improvements could continue to deteriorate in the absence of reinvestment or redevelopment. As no new development would occur, this alternative would not result in environmental impacts associated with construction or operation activities, population growth, increased traffic, or additional demand for public services and utilities. As a result, many of the environmental impacts identified for the proposed project would be avoided or reduced under this alternative.

This alternative would not meet the proposed project's objectives. In particular, this alternative would not contribute to meeting the City's RHNA obligations, nor would it facilitate redevelopment of the underutilized State-owned property consistent with applicable state legislation governing the disposition and planning of the FDC property, including California Government Code Section 14670.31, which establishes a State-City partnership to prepare a specific plan and prioritize mixed-use and affordable housing on the property. Furthermore, this alternative would not provide the mixed-use neighborhood, housing opportunities, open space improvements, or circulation enhancements envisioned under the proposed project. Because approval of the proposed project is necessary to enable the State's disposition process, this alternative assumes that the property would remain in State ownership with no foreseeable redevelopment under existing regulatory conditions.

4.5.1 Aesthetics

This alternative would avoid aesthetic changes associated with new construction of the proposed project. Existing views, building conditions, and landscape features would remain unchanged, though continued underutilization could contribute to visual deterioration over time. Impacts related to light and glare would be reduced compared to the proposed project. This alternative could potentially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, impacts would be greater than the project site but remain less than significant. Similar to the proposed project, cumulative impacts would not be cumulatively considerable.

4.5.2 Air Quality

No construction or operational emissions would occur. As a result, air quality impacts associated with construction dust, vehicle emissions, or energy use would be avoided. No mitigation measures would be required compared to the proposed project. Significant and unavoidable

impacts would be eliminated under this alternative. This alternative would not contribute to cumulative air quality impacts compared to the proposed project.

4.5.3 Biological Resources

No habitat disturbance or vegetation removal would occur. Existing wildlife and plant communities would remain undisturbed. No impacts would occur to biological resources compared to the proposed project. Impacts would be less than the proposed project and no mitigation measures would be required. No cumulative impacts would occur.

4.5.4 Cultural Resources

Under this alternative, no ground-disturbing activities would occur under, and impacts associated with construction of new development would be avoided. However, the potential for deterioration of existing historic elements may continue over time. As a result, some level of intervention or disturbance could still occur to maintain or preserve these elements. Overall, impacts would be less than those associated with the proposed project. Significant and unavoidable impacts to historic resources that could occur under the proposed project would be avoided under this alternative. Nevertheless, mitigation measures would still be required to preserve existing historic resources in their current condition. No cumulative impacts on cultural resources would occur under this alternative.

4.5.5 Energy

No increase in energy consumption from new development would occur. Energy impacts would be avoided. Impacts would be less than the proposed project. No cumulative impacts would occur.

4.5.6 Geology and Soils

No grading or excavation would occur, avoiding construction-related geologic impacts. No impacts would occur to unique paleontological resources; therefore, no mitigation measures protecting paleontological resources would be required. Impacts would be less than the proposed project. No cumulative impacts would occur.

4.5.7 Greenhouse Gas Emissions

Greenhouse gas emissions associated with construction and operation of the project would be avoided. No mitigation measures would be required compared to the proposed project. Significant and unavoidable impacts would be eliminated under this alternative. This alternative

would not contribute to cumulative greenhouse gas emissions impacts compared to the proposed project.

4.5.8 Hazards and Hazardous Materials

Construction-related hazardous materials use would be avoided under this alternative. Existing project site conditions would remain unchanged, though potential ongoing hazards from prior uses could persist. No mitigation measures would be required under this alternative because no new development would occur that would introduce people to the project site. Similarly, mitigation measures related to providing a second access point at Harbor Boulevard and Harbor Center would not be needed, as no new occupants or visitors would be present. Overall, impacts would be less than those of the proposed project. No cumulative impacts would occur.

4.5.9 Hydrology and Water Quality

No changes to drainage, runoff, or water quality would occur. Impacts associated with construction and increased impervious surfaces would be avoided. Impacts would be less than the proposed project and no cumulative impacts would occur.

4.5.10 Land Use and Planning

No changes to land use or zoning would occur. This alternative would be consistent with existing General Plan land use designations and zoning. However, without the Specific Plan framework, redevelopment would be incremental and might not achieve the same level of land use integration, compatibility, or coordinated planning. Impacts would be greater compared to the proposed project. No cumulative impacts would occur.

4.5.11 Noise

No construction or operational noise from development would occur. Since no construction activities would occur, impacting nearby noise-sensitive receptors, then no mitigation measures would be required. Noise impacts would be reduced but remain less than significant with mitigation measures. Impact would be less than the proposed project and no cumulative impact would occur.

4.5.12 Population and Housing

Since no new development would occur on the project site, this alternative would not contribute to new housing or population growth, and housing needs under the City's RHNA would not be met. In particular, no affordable or mixed-income housing would be provided. The

FDC site is identified as an inventory site in the City's 6th Housing Element and represents planned growth that the City is anticipating. By not constructing the housing units included in the proposed project, this alternative would result in greater impacts on housing and population because the City's planned development goals and housing commitments would not be realized. This alternative would not displace existing residents or housing, and no on-site population growth would occur. No cumulative impacts would occur.

4.5.13 Public Services

No additional demand for schools, police, fire, or other public services would occur. Impacts would be less than the proposed project. No cumulative impacts would occur.

4.5.14 Recreation

No new parks, trails, or recreational facilities would be provided under this alternative. The alternative would not result in increased use of recreational facilities. However, planned improvements to open space and recreational amenities envisioned under the proposed project would not occur. As a result, the City would continue to experience a deficiency in parkland and open space that this alternative would not address. Impacts on recreation would be greater than those of the proposed project. No cumulative impacts would occur.

4.5.15 Transportation

Under this alternative, no new development would occur on the project site. Because no additional residential, commercial, or mixed-use uses would be introduced, this alternative would not generate new vehicle trips. Potential improvements to circulation, street networks, or emergency access included in the proposed project would not occur. In addition, no new mitigation measures related to the secondary access point would be required, since no new residents, employees, or visitors would be introduced to the project site. Impacts to transportation would be less than those of the proposed project, and no cumulative impacts would occur.

4.5.16 Tribal Cultural Resources

No ground-disturbing activities would occur, avoiding impacts to undiscovered tribal resources. Therefore, no mitigation measures would be required compared to the proposed project. Under this alternative, impacts would be less compared to the proposed project. No cumulative impacts would occur.

4.5.17 Utilities and Service Systems

No increase in demand for water, wastewater, or electricity would occur; existing infrastructure would remain underutilized. Impacts would be less compared to the proposed project and no cumulative impacts would occur.

4.6 ALTERNATIVE 2: NO PROJECT (GENERAL PLAN BUILDOUT/NO SPECIFIC PLAN)

CEQA Guidelines Section 15126.6(e) requires evaluation of a "No Project" Alternative. Under this alternative, the FDCSP would not be adopted, and no comprehensive planning framework or master developer would guide redevelopment of the project site. Instead, the project site would remain subject to the existing City of Costa Mesa General Plan land use designations and zoning regulations shown in Table 4-1, *Current General Plan Land Use and Zoning*.

In contrast to the proposed project, which establishes a coordinated Specific Plan, this alternative assumes that any future development would not have a unifying land use plan and would instead proceed on a project-by-project basis. Under this alternative, the project site would be subject to the Surplus Land Act and would need to be sold or leased accordingly, as Senate Bill (SB) 188 exempts the site only for purposes of implementing the City's Specific Plan. While the existing General Plan land use designations and zoning would remain in place, the project site would still likely be redeveloped over time consistent with applicable State laws, the City's General Plan, and the development capacity identified in the City's 6th Cycle Housing Element.

The City's 6th Cycle Housing Element identifies the project site as a key site, capable of accommodating a minimum of 2,300 residential units to help meet the City's RHNA. This alternative assumes the project site could accommodate approximately 2,300 residential units, consistent with the development capacity identified in the City's Housing Element.

This alternative would also be subject to the same affordable housing requirements as the proposed project, including provisions related to Department of Developmental Services (DDS) housing under SB 82 and developer-provided housing under SB 188, Developmental services omnibus. Under SB 82, up to 20 acres of the site may be developed for affordable housing serving individuals with developmental disabilities, with a minimum of 20 percent of units reserved for this population. In addition, SB 188 requires the inclusion of at least 200 units of permanent supportive housing.

Table 4-2, *Alternative 2 Housing Units by RHNA Category*, presents the distribution of units by income level under this alternative.

Table 4-2 Alternative 2 Housing Units by RHNA Category

Income Level	DDS Housing[1]	Development Residential[2]	Total
Very Low	96	479	575
Low	--	345	345
Moderate	384	306	690
Above Moderate	--	690	690
Total	**480**	**1,820**	**2,300**

Notes:

1 Assumes the DDS component would be retained consistently with the proposed project. The 15-acre DDS site would yield 480 units, including 96 units for low-income households. The remaining 1,820 units would be developed by a private developer.

2 Developer-provided units assume the same distribution of very low- and moderate-income units as the proposed project. Low-income units are based on the 6th Cycle Housing Element (Table B-1: Summary of RHNA Status and Sites Inventory). Above moderate-income units reflect the remaining development capacity of the 1,820 developer units.

In addition, according to the I&R-MLT development standards for the project site, as shown in Table 4-1, a minimum of 25 percent open space would be required, resulting in approximately 23 acres of park space on the 93-acre site. Additionally, this alternative would continue to require the secondary access road through the golf course due to the 2,300 units required by the Housing Element. A secondary access road at Harbor Boulevard and Harbor Center would still be constructed to adequately serve future residential development.

Environmental impacts under the No Project Alternative (General Plan Buildout/No Specific Plan) would be similar to those associated with the proposed project because the project site would still be redeveloped with residential uses and supporting infrastructure. Impacts related to population growth, vehicle trips, and operational resource demand could be reduced due to the lower number of housing units compared to the proposed project. However, the No Project Alternative (General Plan Buildout/No Specific Plan) would not remove any of the significant and unavoidable impacts identified for the project air quality, historic resources, and greenhouse gas (GHG) emissions.

Overall, the No Project Alternative (General Plan Buildout/No Specific Plan) would meet the objective of contributing to the City's RHNA obligations by accommodating residential development on the project site and meet the intent of providing housing in State legislation. However, because redevelopment would not have a comprehensive planning framework, this alternative would not fully achieve objectives related to creating a cohesive mixed-use neighborhood, integrating open space and recreation amenities, improving multimodal connectivity, or redeveloping the site as a coordinated, walkable community.

4.6.1 Aesthetics

Under this alternative, the project site would be developed incrementally under existing General Plan land use designations and zoning regulations rather than under a unified Specific Plan or master developer. Site design, architecture, and landscaping would vary between individual development projects. While future development would still be subject to the City's design standards and review processes, the absence of a coordinated planning framework could result in a less cohesive visual character compared to the proposed project. Impacts related to visual quality, light and glare, and site aesthetics would be similar compared to the proposed project. Under this alternative, impacts would be similar in comparison to the proposed project and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.6.2 Air Quality

This alternative would result in development of the project site with residential and potentially limited non-residential uses, consistent with existing land use designation and zoning. Construction and operational air pollutant emissions would be lower overall than the proposed project due to the reduced development intensity. Similar to the proposed project, significant and unavoidable impacts would still involve construction and operational emissions exceeding regulatory thresholds, contributing to cumulative nonattainment conditions, and potentially exposing sensitive receptors to harmful pollutant levels because this alternative would develop similar land uses in multiple development projects. Impacts would be reduced compared to the proposed project but would remain significant and unavoidable. This alternative would result in cumulatively considerable impacts, similar to the proposed project.

4.6.3 Biological Resources

Development under this alternative would disturb existing biological resources on the project site similar to the proposed project. Sensitive and migratory species and potential wetland resources would still exist on the project site; therefore, future development would need to include similar mitigation measures as the proposed project to protect these biological resources. Compliance with federal, State, and local regulations would ensure protection of sensitive species and habitats. Impacts would be similar to the proposed project and remain less than significant with mitigation measures. Impact to unknown aquatic resource (potential wetland) would remain significant and unavoidable. Cumulative impacts would be less than significant similar to the proposed project.

4.6.4 Cultural Resources

Ground-disturbing activities associated with this alternative could still result in impacts on previously undiscovered cultural resources (archeological and human remains). As with the proposed project, compliance with applicable regulations and mitigation measures would reduce impacts to less-than-significant levels. Impacts to historical resources would still be significant and unavoidable because development would still impact the Historic District. Impacts would be similar to those identified for the proposed project. Impacts on historical resources would remain significant and unavoidable. Cumulative impacts would be less than significant similar to the proposed project.

4.6.5 Energy

Energy demand under this alternative would be similar due to similar proposed land uses (residential, commercial, mixed use). Future development would be required to comply with State energy efficiency standards, including Title 24. Impacts related to energy consumption would be similar but reduced relative to the proposed project due to reduced development intensity. Impacts would remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.6.6 Geology and Soils

Development under this alternative would be subject to the same geologic and soil conditions as the proposed project. Compliance with building codes and engineering standards would reduce risks related to seismic hazards, soil stability, and erosion. Construction of the development under the alternative could still encounter unique paleontological resources during ground-disturbing activities; therefore, similar mitigation measures protecting paleontological resources would be applied to future development. Impacts would be similar to those identified for the proposed project and remain less than significant with mitigation measure. Cumulative impacts would be less than significant similar to the proposed project.

4.6.7 Greenhouse Gas Emissions

Under this alternative, construction and operation of new development would still generate GHG emissions; however, overall emissions would be lower than the proposed project due to reduced development intensity and fewer vehicle trips. Similar mitigation measures would apply. For example, Mitigation Measure AIR-1 requires installation of EV charging infrastructure to support increased electric vehicle use, and Mitigation Measure AIR-2 would reduce energy demand and promote the use of efficient appliances. Despite these mitigation measures, operational emissions would continue to result in a cumulatively considerable increase in GHG

emissions that exceeds the South Coast Air Quality Management District (AQMD) threshold due to the development of approximately 2,300 housing units and associated non-residential uses. Therefore, while impacts would be less than those of the proposed project, GHG emissions would remain significant and unavoidable. Cumulative impacts would be less than significant similar to the proposed project.

4.6.8 Hazards and Hazardous Materials

Under this alternative, future development of the project site would continue to involve the handling, removal, or remediation of hazardous materials associated with existing uses, requiring implementation of similar mitigation measures as the proposed project. In addition, a secondary access road at Harbor Boulevard and Harbor Center would still be constructed to adequately serve future residential development. Because Harbor Boulevard would remain a major evacuation route, preparation and implementation of a Construction Traffic Management Plan would also be required. Impacts would be similar to the proposed project and would remain less than significant with mitigation measures. Cumulative impacts would be less than significant similar to the proposed project.

4.6.9 Hydrology and Water Quality

Development under this alternative would increase impervious surfaces and stormwater runoff, similar to the proposed project. However, projects would be required to comply with applicable stormwater regulations and implement best management practices. Impacts related to runoff and water quality would be similar compared to the proposed project and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.6.10 Land Use and Planning

This alternative would be consistent with existing General Plan land use designations and zoning and would support implementation of the City's Housing Element. However, without the Specific Plan framework, redevelopment would be incremental and might not achieve the same level of land use integration, compatibility, or coordinated planning. This alternative would not physically divide an established community. Impacts would be greater compared to the proposed project but remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.6.11 Noise

Under this alternative, construction and operational noise would be lower than the proposed project due to reduced development intensity. Compliance with applicable local noise regulations would help minimize these effects. However, construction activities could still result in temporary significant noise increases affecting nearby noise-sensitive receptors, which would remain in proximity to future development under this alternative. Accordingly, similar mitigation measures as identified for the proposed project would be required. Noise impacts would be reduced but remain less than significant with mitigation measures. Cumulative impacts would be less than significant similar to the proposed project.

4.6.12 Population and Housing

This alternative would allow for development of approximately 2,300 residential units, which would contribute to meeting the City's RHNA. This alternative would also be required to provide affordable housing units as part of the development. However, as shown in Table 4-2, this alternative would provide less affordable housing. The projected population under this alternative would be 5,980 people based on 2.6 residents per dwelling unit, which is the same factor used the proposed project (US Census 2023).[2] This level of development would still result in population growth and an increase in local housing supply. In addition, under this alternative, future development would not displace existing people or housing. Impacts would be similar to the proposed project and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.6.13 Public Services

This alternative would increase demand for public services, including police and fire protection, schools, and libraries, as a result of new residential development and associated population growth. This increased demand could require additional staffing, facilities, or service capacity to maintain acceptable service levels. However, because overall development intensity and population growth would be lower than under the proposed project, the incremental demand for public services would also be reduced. This alternative would result in 438 students compared to 762 from the proposed project.[3] Therefore, impacts would be reduced compared

[2] 2,300 dwelling units x 2.6 residents per dwelling unit = 5,980 people
[3] Elementary School =0.0944
Middle and High School =0.0961
(2,300*0.0944) + (2,300*0.0961) = 438

to the proposed project but remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.6.14 Recreation

This alternative would increase demand for parks and recreational facilities due to new residents. Based on the City's standard of 4.26 acres of parkland per 1,000 residents, this alternative would require approximately 25.47acres of parkland[4] but provide only 23.25 acres of publicly accessible open space, resulting in a shortfall. In addition, since there is no Specific Plan, there would be no park within the project site for this alternative. Future projects under this alternative could meet parkland requirements through land dedication or payment of in-lieu fees; however, without a comprehensive, master-planned approach, recreational amenities would be smaller, fragmented, and less coordinated. As a result, impacts related to parks and recreation would remain tied to the existing parkland deficit and would be greater than under a coordinated plan but would remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.6.15 Transportation

This alternative would generate approximately 44 percent fewer vehicle trips than the proposed project due to reduced development intensity and fewer mixed-use components. This alternative would result in 10,353 daily trips while the proposed project would result in 18,494 daily trips (See Appendix M.1, Alternatives Trip Generation). In addition, a secondary access road at Harbor Boulevard and Harbor Center would still be constructed to adequately serve future residential development. Because Harbor Boulevard would remain a major evacuation route, preparation and implementation of a Construction Traffic Management Plan would also be required to ensure adequate emergency access from the project site. Impacts would be reduced compared to the proposed project but remain less than significant with mitigation measures. Cumulative impacts would be less than significant similar to the proposed project.

4.6.16 Tribal Cultural Resources

Ground disturbance could result in impacts to undiscovered tribal cultural resources. Compliance with applicable regulations, including consultation requirements, and mitigation measures similar to the proposed project would reduce impacts. Impacts would be similar to

[4] 4.26 acres (5,980 proposed residents ÷ 1,000 residents) = 25.47

the proposed project. Cumulative impacts would be less than significant similar to the proposed project.

4.6.17 Utilities and Service Systems

This alternative would increase demand for utilities and service systems, including water supply, wastewater treatment, stormwater infrastructure, and solid waste disposal. Demand would be lower than the proposed project due to reduced development intensity. Impacts would be reduced and all future development would be required to comply with applicable service provider requirements. Impacts would remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7 ALTERNATIVE 3: PARTIAL ADAPTIVE REUSE OF HISTORIC DISTRICT

The Partial Adaptive Reuse of Historic District Alternative assumes that portions of the existing FDC district that contribute to the historic district, such as selected buildings, landscape features, pathways, and the overall campus layout, would be preserved and incorporated into the redevelopment of the project site. Under this alternative, the proposed project would prioritize the retention and adaptive reuse of existing buildings and project site elements to the greatest extent feasible, based on structural condition, safety considerations, and the ability to remediate hazardous materials. Buildings that cannot be feasibly rehabilitated due to safety concerns or other constraints would be demolished and replaced with new development.

This alternative assumes that the overall development capacity of the project site would remain consistent with the proposed project (i.e. up to 4,000 units) to meet housing objectives for the property. However, because some existing buildings would be retained and reused, new development may need to be reconfigured to accommodate the preserved structures and campus features. As a result, new buildings may be taller or development patterns may be more compact in certain areas of the project site to achieve similar housing capacity. In addition, the preservation of portions of the historic district layout, including pathways and open space features, could influence the distribution of development across the project site. This alternative would still provide a minimum of 14 acres of open space, consistent with the proposed project, and a secondary access point at Harbor Boulevard and Harbor Center would continue to be included to serve future residents.

Preserving select historic buildings and campus elements would help maintain aspects of the historic character of the FDC and could reduce the extent of demolition of contributing resources. As a result, this alternative could reduce impacts on historical resources compared to the proposed project. However, because some buildings that contribute to the historic district

would still need to be demolished or altered to accommodate redevelopment of the project site, impacts to historical resources would likely remain significant and unavoidable, although potentially reduced compared to the proposed project. In addition, the Partial Adaptive Reuse of Historic District Alternative would not remove any of the other significant and unavoidable impacts identified, such as air quality and greenhouse gases.

This alternative would allow redevelopment of the project site while retaining elements of the historic district and maintaining the campus character associated with the former FDC. Because it could partially reduce impact on historical resources while still allowing the project site to be redeveloped to meet housing objectives, this alternative is considered feasible and is carried forward for further analysis in this Draft EIR.

4.7.1 Aesthetics

Under the Partial Adaptive Reuse Alternative, redevelopment of the project site would incorporate existing historic buildings, landscape features, and circulation patterns into the overall site design. This approach would help maintain elements of the project site's historic visual character and campus-like setting. Similar to the proposed project, development would be subject to City design standards and review processes. Impacts related to visual quality, light and glare, and site aesthetics would be similar to the proposed project and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7.2 Air Quality

This alternative would involve both rehabilitation of existing buildings and construction of new development. Construction-related emissions would be reduced compared to the proposed project due to decreased demolition and reuse of existing materials; however, renovation activities and new construction would still generate emissions. Operational emissions would be similar to the proposed project because overall development intensity and land uses would be comparable. As with the proposed project, emissions would exceed applicable South Coast Air Quality Management District (South Coast AQMD) thresholds. Therefore, impacts would remain significant and unavoidable, although construction-related emissions may be incrementally reduced. Cumulative impacts would be less than significant similar to the proposed project. This alternative would result in cumulatively considerable impacts, similar to the proposed project.

4.7.3 Biological Resources

Development under this alternative would disturb biological resources similar to the proposed project. While retention of certain landscape features could preserve limited habitat areas, most of the project site would still be redeveloped. Sensitive and migratory species and

potential wetland resources may still be present, and similar mitigation measures would be required. Compliance with applicable regulations would ensure protection of biological resources. Impacts would be similar to the proposed project and remain less than significant with mitigation. Impact to unknown aquatic resource (potential wetland) would remain significant and unavoidable. Cumulative impacts would be less than significant similar to the proposed project.

4.7.4 Cultural Resources

This alternative would reduce impacts on historical resources by preserving and adaptively reusing a portion of the contributing buildings and features within the Historic District. Retention of these elements would maintain aspects of the project site's historic integrity and reduce the overall level of impact compared to the proposed project. However, because some contributing resources would still be demolished or altered, impacts to historical resources would remain significant and unavoidable, although reduced. As with the proposed project, ground-disturbing activities could affect unknown archaeological resources or human remains, and mitigation measures would reduce these impacts to less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7.5 Energy

Adaptive reuse of existing buildings can reduce energy consumption associated with demolition and new construction materials. However, retrofitting older structures to meet current energy efficiency standards may require substantial upgrades. Overall operational energy demand would be similar to the proposed project due to comparable development intensity and land uses. Compliance with Title 24 and other applicable regulations would ensure efficient energy use. Impacts would be similar to the proposed project and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7.6 Geology and Soils

This alternative would be subject to the same geological and soil conditions as the proposed project. Rehabilitation of existing structures and construction of new buildings would require compliance with current building codes and engineering standards. Ground-disturbing activities could still encounter paleontological resources, and similar mitigation measures would apply. Impacts would be similar to the proposed project and remain less than significant with mitigation. Cumulative impacts would be less than significant similar to the proposed project.

4.7.7 Greenhouse Gas Emissions

GHG emissions would be generated from both construction and operation of the development. Adaptive reuse may reduce some emissions associated with demolition and material production; however, operational emissions would be similar due to the same development intensity. As with the proposed project, GHG emissions would exceed applicable thresholds even with mitigation measures such as EV infrastructure and energy efficiency requirements. Therefore, impacts would remain significant and unavoidable, although construction-related emissions may be incrementally reduced. This alternative would result in cumulatively considerable impacts, similar to the proposed project.

4.7.8 Hazards and Hazardous Materials

Adaptive reuse of existing buildings would require remediation of hazardous materials such as asbestos and lead-based paint, similar to the proposed project. In some cases, reuse may increase the complexity of remediation efforts compared to full demolition. Compliance with applicable regulations and implementation of mitigation measures would reduce risks. Similar to the proposed project, a secondary access road at Harbor Boulevard and Harbor Center would be constructed, and a Construction Traffic Management Plan would be required. Impacts would be similar and remain less than significant with mitigation. This alternative would result in cumulatively considerable impacts, similar to the proposed project.

4.7.9 Hydrology and Water Quality

This alternative would increase impervious surfaces and stormwater runoff similar to the proposed project. Retention of some existing landscape features may provide benefits for infiltration and runoff management. All development would be required to comply with applicable stormwater regulations and implement best management practices. Impacts would be similar to the proposed project and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7.10 Land Use and Planning

This alternative would support redevelopment of the project site consistent with City and State housing goals while preserving elements of the Historic District. However, the need to retain and integrate existing buildings and project site features could constrain site planning and reduce flexibility in achieving optimal land use integration compared to the proposed project. Despite these constraints, development would occur within a coordinated planning framework. The No Project Alternative would not physically divide an established community. Impacts

would be similar to the proposed project and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7.11 Noise

Construction activities would include both building rehabilitation and new construction, resulting in temporary noise increases similar to the proposed project. Reduced demolition may slightly decrease peak construction noise levels. Operational noise would be similar due to comparable land uses and development intensity. Compliance with local noise regulations and implementation of mitigation measures would reduce impacts. Impacts would be similar to the proposed project and remain less than significant with mitigation. Cumulative impacts would be less than significant similar to the proposed project.

4.7.12 Population and Housing

This alternative would provide a similar number of residential units as the proposed project and would contribute to meeting the City's RHNA obligations. Population growth and associated demand for services and infrastructure would therefore be similar. Under this alternative, future development would not displace existing people or housing, similar to the proposed project Impacts would be similar to the proposed project and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7.13 Public Services

Demand for public services, including police, fire, schools, and libraries, would increase under this alternative due to new residential development. Because the number of units would be similar to the proposed project, demand for services would also be comparable. Impacts would be similar and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7.14 Recreation

This alternative would increase demand for parks and recreational facilities similar to the proposed project. Preservation of existing open space and campus features could provide opportunities for integrated recreational amenities within the project site. However, similar to the proposed project, a shortfall in parkland relative to City standards may occur. Parkland requirements could be addressed through a combination of on-site amenities, land dedication, and in-lieu fees. Impacts would be similar and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.7.15 Transportation

Vehicle trips generated under this alternative would be similar to the proposed project due to comparable development intensity. Retention of existing circulation patterns could influence site access and internal circulation, potentially creating design constraints but also opportunities for a more connected network. Similar improvements, including a secondary access road at Harbor Boulevard and Harbor Center, would be required. Impacts would be similar to the proposed project and remain less than significant with mitigation. Cumulative impacts would be less than significant similar to the proposed project.

4.7.16 Tribal Cultural Resources

Ground-disturbing activities could impact undiscovered tribal cultural resources. Compliance with applicable regulations and implementation of mitigation measures, including consultation requirements, would reduce impacts. Impacts would be similar to the proposed project. Cumulative impacts would be less than significant similar to the proposed project.

4.7.17 Utilities and Service Systems

This alternative would increase demand for utilities and service systems similar to the proposed project. Adaptive reuse of existing infrastructure may provide minor efficiencies; however, upgrades would be required to meet current standards. Compliance with service provider requirements would ensure adequate capacity. Impacts would be similar and remain less than significant. Cumulative impacts would be less than significant similar to the proposed project.

4.8 SUMMARY OF ALTERNATIVES EVALUATION

Table 4-3, *Comparison of Project Alternative Impacts*, compares the impact of each alternative to impacts of the proposed project. The impacts of each alternative are classified as having a reduced (↓), similar or comparable to (=), or greater (↑) level of impact when compared to the proposed project.

Table 4-3 Comparison of Project Alternative Impacts

Environmental Topic	Proposed Project	Alternative 1: No Project/ No Development	Alternative 2: No Project Alternative	Alternative 3: Partial Adaptive Reuse of Historic District
3.1 Aesthetics	LTS	↑	=	=
3.2 Air Quality	SU	↓	↓	↓
3.3 Biological Resources	SU	↓	=	=
3.4 Cultural Resources	SU	↓	=	↓
3.5 Energy	SU	↓	↓	=
3.6 Geology and Soils	LTS/M	↓	=	=
3.7 Greenhouse Gas Emissions	SU	↓	↓	↓
3.8 Hazards and Hazardous Materials	LTS/M	↓	=	=
3.9 Hydrology and Water Quality	LTS	↓	=	=
3.10 Land Use and Planning	LTS	↑	↑	=
3.11 Noise	LTS/M	↓	=	=
3.12 Population and Housing	LTS	↑	=	=
3.13 Public Services	LTS	↓	↓	=
3.14 Recreation	LTS	↑	↑	=
3.15 Transportation	LTS/M	↓	↓	=
3.16 Tribal Cultural Resources	LTS/M	↓	=	=
3.17 Utilities and Service Systems	LTS	↓	=	=

Notes:

NI No Impact
PS Potentially Significant
LTS Less than Significant
LTS/M Less than Significant with Mitigation
SU Significant and Unavoidable

↓ Reduced impact in comparison to the proposed project
= Similar impact in comparison to the proposed project
↑ Greater impact in comparison to the proposed project

Table 4-3, *Ability to Meet Proposed Project Objectives*, identifies the ability of each of the project alternatives to meet the proposed project's objectives.

Table 4-3 Ability to Meet Proposed Project Objectives

Objective	Proposed Project	Alternative 1: No Project/ No Development	Alternative 2: No Project Alternative	Alternative 3: Partial Adaptive Reuse of Historic District
Regional Housing Needs. Contribute to meeting the City's Regional Housing Needs Assessment (RHNA) obligations by providing diverse housing opportunities for very low-, low-, moderate-, and above-moderate-income households.	Yes	No	Yes	Yes
Promote Inclusive, Mixed-Income Community Development. Foster a balanced, mixed-use neighborhood that integrates residential, commercial, and community-serving uses to support social, economic, and cultural vitality.	Yes	No	Partial	Yes
Enhance Open Space and Recreation Access. Provide accessible parks, trails, and recreational facilities to improve quality of life and encourage active lifestyles for residents and the surrounding community.	Yes	No	Partial	Partial
Improve Connectivity and Mobility. Create safe, efficient, multimodal access within the site and to surrounding areas, including pedestrian and bicycle infrastructure, public transit connections, and emergency access.	Yes	No	No	No
Optimize Land Use and Community Integration. Redevelop an underutilized State property into a cohesive, walkable, and well-connected neighborhood that complements surrounding land uses and strengthens community identity.	Yes	No	No	Yes

4.8.1 Summary of Alternative 1: No Project/ No Development

As shown in Table 4-2, the No Project / No Development Alternative would generally result in impacts that are reduced compared to the proposed project across most environmental topics, except for aesthetics, land use and planning, population and housing, and recreation which would be greater in comparison to the proposed project. In addition, significant and unavoidable impacts from air quality, biological resources, GHG, and cultural resources would be eliminated under this alternative. As shown in Table 4-3, this alternative would not achieve any of the proposed project objectives. In summary, while this alternative would minimize the most environmental impacts, it would also fail to advance the City's planned growth objectives, housing goals, and broader community development priorities.

4.8.2 Summary of Alternative 2: No Project Alternative (General Plan Buildout/No Specific Plan)

As shown in Table 4-2, the No Project Alternative (General Plan Buildout/No Specific Plan) would result in impacts that are similar to or reduced compared to the proposed project except for land use and recreation impacts which would be greater. Impacts related to air quality, energy, greenhouse gas emissions, population and housing, public services, and transportation would be reduced due to the lower development intensity. However, impacts related to land use and planning and recreation would be greater because development would occur incrementally without a coordinated Specific Plan framework, resulting in less efficient land use patterns. Other impact areas would be similar to the proposed project, and significant and unavoidable impacts particularly related to air quality, biological resources, greenhouse gas emissions, and historical resources would not be eliminated.

As shown in Table 4-3, the No Project Alternative (General Plan Buildout/No Specific Plan) would meet the objective of contributing to the City's RHNA by accommodating residential development on the project site. However, it would only partially meet objectives related to mixed-use community development and provision of open space and recreation due to the lack of a cohesive planning framework. Additionally, this alternative would not meet objectives related to improving connectivity and mobility or optimizing land use and community integration, because development would be on a project-by-project basis without a comprehensive, coordinated vision.

4.8.3 Summary of Alternative 3: Partial Adaptive Reuse of Historic District

As shown in Table 4-2, the Partial Adaptive Reuse of Historic District Alternative would result in impacts that are similar to the proposed project, with some reduced impacts. Notably, impacts

on cultural (historical) resources would be reduced due to the preservation and adaptive reuse of a portion of the Historic District. Air quality and greenhouse gas emissions associated with construction may also be incrementally reduced due to decreased demolition and material use. However, this alternative would not avoid significant and unavoidable impacts identified for the proposed project, including those related to air quality biological resources, and greenhouse gas emissions. Most other environmental topics would result in impacts similar to the proposed project due to comparable development intensity and land uses.

As shown in Table 4-3, this alternative would meet most of the proposed project objectives, including contributing to RHNA obligations, promoting a mixed-use community, and optimizing land use through a coordinated redevelopment approach. However, it would only partially meet the objective of enhancing open space and recreation access, as retention of existing buildings and project site features may constrain the amount and configuration of new recreational amenities. In addition, this alternative would not fully meet the objective of improving connectivity and mobility, as preservation of existing site layouts and circulation patterns could limit the ability to implement an optimal, fully integrated multimodal circulation network.

Overall, this alternative represents a feasible option that would reduce impacts to historical resources while still achieving many of the proposed project's key objectives, but with some trade-offs related to site planning flexibility and circulation efficiency.

4.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed project that would be expected to generate the least significant impacts. Identification of the environmentally superior alternative is an informational procedure, and the alternative to the proposed project selected may not be the alternative to the proposed project that best meets the goals or needs of the City of Costa Mesa. Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed project, the proposed project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

As shown in Table 4-2, the No Project/No Development would result in reduced impacts across most environmental categories, except for aesthetics, land use and planning, population and housing, and recreation which would be greater in comparison to the proposed project. In addition, significant and unavoidable impacts from air quality, biological resources, GHG, and cultural resources would be eliminated under this alternative. However, because this alternative

would not achieve any of the proposed project objectives and would leave the City's housing, open space, and planned growth goals unmet, the Partial Adaptive Reuse of Historic District Alternative is identified as the environmentally superior alternative among the action alternatives.

The Partial Adaptive Reuse of Historic District Alternative would result in impacts that are similar to the proposed project but would reduce impacts to historical resources through the preservation and adaptive reuse of a portion of the Historic District. This alternative would also incrementally reduce construction-related air quality and greenhouse gas emissions due to reduced demolition and material use. However, similar to the proposed project, this alternative would not avoid significant and unavoidable impacts related to air quality biological resources, and greenhouse gas emissions, and most other impacts would remain comparable due to similar development intensity. This alternative would result in impacts that are similar to or reduced compared to the proposed project and would not result in greater impacts in any resource area. In addition, it would meet a greater number of the proposed project's objectives compared to the No Project Alternative. This alternative provides an effective balance between reducing environmental impacts particularly with respect to historical resources and achieving key proposed project objectives, including redevelopment of the project site and provision of housing to meet the City's RHNA obligations.

4.10 REFERENCES

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5. OTHER CEQA CONSIDERATIONS

This chapter provides a discussion of the effects of the proposed project based on the analyses presented in Sections 3.1 through 3.17 of this Draft Environmental Impact Report (DEIR). The topics covered in this chapter include significant and unavoidable impacts, significant irreversible changes to the environment, growth-inducing effects, and effects found not to be significant. A more detailed analysis of the effects that the proposed project would have on the environment and proposed mitigation measures to minimize significant impacts are provided in Chapter 3, *Environmental Analysis*, of this DEIR.

5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(a) requires that "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects." CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Table ES-2, *Summary of Significant Environmental Impacts and Mitigation Measures*, in the *Executive Summary* of this DEIR summarizes the significant impacts, mitigation measures, and levels of significance with and without mitigation.

Though mitigation measures, where feasible, would reduce the level of impact of the proposed project, the following impacts would remain significant and unavoidable:

- **Impact AIR-1:** The proposed project would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the South Coast AQMD's AQMP.
- **Impact AIR-2:** Construction activities associated with future development that would be accommodated under the proposed project could generate short-term emissions in exceedance of the South Coast AQMD's threshold criteria.
- **Impact AIR-3:** Long-term operation of the proposed project would generate emissions in exceedance of the South Coast AQMD's threshold criteria and cumulatively contribute to the South Coast Air Basin's nonattainment designations.
- **Impact AIR-4:** Construction of the proposed project could expose sensitive receptors to substantial pollutant concentrations.
- **Impact AIR-5:** The proposed project's contribution to cumulative air quality impacts would be cumulatively considerable.
- **Impact BIO-2:** Construction and operation of the proposed project may have an impact on an unknown aquatic resource (potential wetland).

- **Impact CUL-1:** The proposed project would result in a substantial adverse change in the significance of a historical resource due to the removal of historic buildings within the Fairview Developmental Center.
- **Impact GHG-1:** Operation of the proposed project would generate a cumulatively considerable increase in GHG emissions that would exceed the South Coast AQMD Working Group bright-line threshold.
- **Impact GHG-2:** The proposed project, together with cumulative projects, would result in substantial GHG emissions impacts.

5.2 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss whether "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." The discussion shall consider primary and secondary impacts that generally commit future generations to similar uses, irreversible damage from environmental accidents, and irretrievable commitments of resources.

The following are the significant irreversible changes that would be caused by the proposed project if it is implemented:

- Construction of the proposed Fairview Developmental Center Specific Plan would require the commitment of nonrenewable and/or slowly renewable energy resources, including gasoline, diesel fuel, and electricity; human resources; and natural resources such as sand and gravel, steel and other metals, and water.
- Population growth associated with the proposed project would increase vehicle trips over the long term. Emissions associated with such vehicle trips would contribute to the South Coast Air Basin's nonattainment designation for ozone (O_3) and particulate matter ($PM_{2.5}$ and PM_{10}).
- The visual character of the project site would be altered by the construction of the new structures and other various site improvements. This would result in a permanent change in the character of the project site and on- and off-site views in the project's vicinity
- Operation of the proposed project would require continued use of electricity, petroleum-based fuels, fossil fuels, and water.
- Operation of the proposed project would require a continued commitment of social services and public maintenance services (e.g., police, fire, electricity).

The commitment of resources required for the construction and continued operation of the site would limit the availability of resources for future generations or for other uses during the life of the proposed project.

5.3 GROWTH-INDUCING EFFECTS

Section 15126.2(e) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical factors may include the removal of obstacles to population growth, such as through a major expansion of a wastewater plant.

This section evaluates the proposed project's potential to create such growth inducements. As CEQA Guidelines Section 15126.2(e) requires, "It must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." Negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this EIR.

Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

The proposed project is surrounded by urban development on all sides, with residential uses jointly owned and operated by California Department of Developmental Services (DDS) to the north, the developing Southern Regional Emergency Operations Center (SREOC) to the southwest, and the Costa Mesa Country Club the east, west, and south.

As discussed in 3.17, *Utilities and Service Systems*, of the DEIR, extensions of existing utility facilities and off-site utility connections would provide a sufficient tie-in to the existing utility

systems to accommodate the demands of this project at full buildout. The proposed project would not require extension of major infrastructure facilities in the project site or the surrounding area.

To ensure that the proposed project is consistent with the City's General Plan and Zoning Code, the City would adopt a General Plan Amendment and Zoning Code Amendment to change the land use of the project site. The land use designation of the project site would be amended to align with the residential density allowed for the site under the 2021-2029 Housing Element and the existing zoning of the project site would similarly be amended to reflect the FDCSP. Specifically, the City's Zoning Code and Zoning map would be amended to designate the zoning of the project site as "Fairview Developmental Center Specific Plan." Development under the proposed project would be subject to the development standards, permitted uses, and administrative processes designated in the FDCSP. Pressure to develop other land in the surrounding area may derive from regional economic conditions and market demands for housing, commercial, office, and industrial land uses that may be directly or indirectly influenced by the proposed project. Proposals may arise to implement various uses (e.g., residential or mixed uses) in the vicinity of the project site. However, these would require full environmental analysis of the impacts of such actions. The proposed project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes) to implement this project. The proposed project would comply with all applicable City plans, policies, ordinances, etc. to ensure that there are no conflicts with adopted land development regulations and that any environmental impacts are minimized. Therefore, the proposed project, in and of itself, would not be a precedent-setting action; however, the approval of high-density residential uses in the project area could influence owners of neighboring properties to move away from exclusively commercial uses to mixed use and/or residential uses. Nonetheless, the impacts of subsequent similar actions would require environmental analysis and associated mitigation to ensure that such subsequent impacts would not significantly affect the environment.

Would this project result in the need to expand one or more public services to maintain desired levels of service?

The proposed project would increase population and housing in the City. The project is expected to increase demand for fire protection services, police services, school services, and library services, which would contribute to the need to expand facilities. Although, the fire and police service letters did not identify a need for expand or new facilities as a result of the proposed project, the FDCSP permits the development of a fire station, with or without a police substation, within the project site if deemed necessary by the City to maintain service standards. However, as substantiated in Section 3.13, *Public Services*, of the DEIR, existing programs and policies would ensure that the service capability will grow proportionate to the increase in uses, and impacts to public services and utilities would be less than significant.

Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

During project construction, a number of design, engineering, and construction jobs would be created. This would last until project construction is completed. Construction employees would be absorbed from the regional labor force, and the construction of the project would not attract new workers to the region. The operation of the proposed project would result in an estimated increase of 9,926 residents and 74 employees (see Section 3.12, *Population and Housing*).

Residents of the proposed project would seek shopping, entertainment, employment, home improvement, auto maintenance, and other economic opportunities in the City of Costa Mesa and surrounding area. This would increase demand for such economic goods and services and would, therefore, encourage the creation of new businesses and/or the expansion of existing businesses that address these needs. The close proximity to the commercial uses on-site and in the surroundings would result in beneficial impacts to the city's jobs-housing balance (see Section 3.12). Therefore, although the proposed project would have a direct growth-inducing effect, growth generated by the proposed project would not create a significant effect on the environment.

Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

As discussed above, the project would require amendment to the City's General Plan and Zoning Code to change the project site's land use and zoning. The FDCSP land use and zone change could further induce residential growth in the surrounding commercial areas. Proposals may arise to implement residential or mixed use zoning in the vicinity of the project. However, these would require full environmental analysis of the impacts of such actions. The proposed project would not change the existing protocol for project approval and would not set a precedent that would make it more likely for other projects to gain approval of similar applications.

Additionally, standard conditions of approval are required; however, none represent a precedent-setting action. Moreover, no changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement the proposed project. Therefore, the proposed project would not involve a precedent-setting action that would encourage and/or facilitate other activities that could significantly affect the environment.

5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) Guidelines Section 15128, "Effects Not Found to Be Significant," allows environmental issues for which there is no likelihood of significant impact to be "scoped out" and not analyzed further in the EIR. Based on the analysis in the Notice of

Preparation (see Appendix A.1, *Notice of Preparation ad Scoping Meeting Comments*, of this DEIR), it was determined that the proposed project would not result in significant environmental impacts related to the following environmental impact topics, and they are not analyzed in Chapter 3, *Environmental Analysis*, of this DEIR.

5.4.1 Agriculture and Forestry

In determining whether impacts on agriculture and farmland are significant environmental effects, lead agencies may refer to the California Important Farmland Finder Map prepared by the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP), updated in 2022. The FMMP identifies and maps significant farmland. Farmland is classified using a system of five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance is based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the Natural Resources Conservation Service. The DOC also manages the Williamson Act Contract Land Map showing William Act Contracts, updated in 2017.

The project site is identified as Urban Built-Up Land and is not identified as an area of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2026). The proposed project would occur within the boundaries of the existing Fairview Developmental Center, Costa Mesa Country Club, and public rights of way, which is not zoned for agricultural or forestry use, or under a Williamson Act contract. Implementation of the proposed project would not conflict with zoning for agricultural use; no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be converted to nonagricultural use; and no Williamson Act contract would be affected. Therefore, no impacts would occur.

5.4.2 Mineral Resources

In 1975, the State legislature adopted the Surface Mining and Reclamation Act (SMARA). This designated Mineral Resources Zones that were of statewide or regional importance. The classifications used to define MRZs are:

- **MRZ-1. A**reas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.
- **MRZ-2.** Areas where the available geologic information indicates that there are significant mineral deposits or that there is a likelihood of significant mineral deposits.
- **MRZ-3.** Areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined.
- **MRZ-4.** Areas where there is not enough information available to determine the presence or absence of mineral deposits.

The California Department of Conservation Division of Geological Survey produces Mineral Land Classification studies that identify areas with potentially important mineral resources. The Generalized Mineral Land Classification of Orange County map shows that the project site and surrounding area is located is mapped within an MRZ-3 (DOC 1994). Implementation of the proposed project would not result in the loss of availability of a known mineral resource. No impact to known mineral resources would occur.

5.4.3 Wildfire

As identified within the Costa Mesa Safety Element, no part of Costa Mesa is in a state responsibility area or a Very High Fire Hazard Severity Zone (Costa Mesa 2015). Urban fires and grassland fires in open space areas (such as Talbert Regional Park, and Fairview Park) are the only fire risks in the City. The proposed project would not add infrastructure such as roads or overhead power lines in areas with wildland vegetation. Construction and operation of the proposed project would have minimal impact on the existing drainage and runoff. As discussed in Section 3.9, *Hydrology and Water Quality*, the entire project site is in Zone X, an area outside the 500-year flood zone. The proposed project would comply with federal, State, and local policies pertaining to wildfire and would not exacerbate fire risk. Therefore, impacts would be less than significant.

5.5 REFERENCES

Costa Mesa, City of. 2016. Safety Element. In *Costa Mesa General Plan*. https://www.costamesaca.gov/home/showpublisheddocument/34702/636740022576330000.

DOC (California Department of Conservation). 1994. Generalized Mineral Land Classification of Orange County, California, Aggregate Resources Only.

DOC. 2026, March 13 (accessed). California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/.

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