APPENDIX A:
Comment Letters Received on the Draft EIR



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Santa Ana Regional Water Quality Control Board

May 27, 2026

Melinda Dacey
City of Costa Mesa
77 Fair Drive
Costa Mesa, CA 92626

Melinda.Dacey@costamesaca.gov

VIA ELECTRONIC MAIL ONLY

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE FAIRVIEW DEVELOPMENTAL CENTER SPECIFIC PLAN, STATE CLEARINGHOUSE NO. 2025101405

Dear Ms. Dacey:

Thank you for providing Santa Ana Regional Water Quality Control Board (Santa Ana Water Board) staff with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Fairview Developmental Center Specific Plan (Project). The Project would guide the development of a mixed-income, mixed-use community on a 95-acre portion of the former Fairview Developmental Center. A1-1

We appreciate the City of Costa Mesa's effort to present the Santa Ana Water Board's regulatory program for pollutants in stormwater runoff from the Project site in the DEIR. We value the opportunity to better inform the Project's stakeholders and to demonstrate the City's work to comply with the Clean Water Act. Please make the following clarifications in the DEIR.

- In section 3.3.1, please add a section on California Water Code (CWC) section 13000 *et seq*. CWC section 13240 requires each regional board to adopt water quality control plans. The Santa Ana Water Board has adopted the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan). The Basin Plan includes water quality objectives to protect beneficial uses. Among the beneficial uses is the RARE beneficial use for waters that support habitats necessary for the survival and successful maintenance of plant or animal species designated under state or federal law as rare, threatened, or endangered. A1-2

- In section 3.9.1, please explain that the Porter-Cologne Water Quality Control Act was amended to implement parts of the Clean Water Act, including section A1-3

402(p). The amendment helps authorize the Santa Ana Water Board to issue National Pollutant Discharge Elimination System (NPDES) permits under the Clean Water Act. A1-3 cont'd

Santa Ana Water Board staff is concerned that the City's DEIR does not articulate a strategy to incorporate structural treatment controls into the Project's storm drain infrastructure in a way that does not risk noncompliance with the requirements of Order R8-2009-0033, NPDES Permit CAS618030. Section XII.A.2, in part, encourages the City to require submission of a conceptual Water Quality Control Plan (WQMP) as early in the planning process as possible. A conceptual WQMP would describe best management practices for source control, pollution prevention, site design, low impact development implementation, and structural treatment controls pursuant to section XII.A.3 of the Order. A1-4

At this planning stage of the Project, Santa Ana Water Board staff is most concerned with structural treatment controls that would comprehensively treat all runoff from the Project. The City could require that structural treatment controls be proposed as part of subsequent projects on lots within the Project area. This could result in a piecemeal approach to developing treatment control infrastructure that risks omitting treatment of runoff from the public roadways in the Project area.

Section 7.II-2.4.1 of the Model WQMP requires that "[s]treets, roads or highway projects that are planned and constructed as part of a private new development or significant redevelopment project, even if they will become dedicated public right-of-way upon project completion, must be included as part of the overall Project WQMP for the private project." Section XII.B.2 of Order R8-2009-0033 requires that each project WQMP be developed in accordance with the Model WQMP. Not only would each subsequent project risk noncompliance with the Order, but the cost and treatment effectiveness of a piecemealed approach is likely to be limited. A1-5

Alternatively, the City could propose a comprehensive strategy for the Project by identifying and locating a conceptual sub-regional treatment control in section 2.6.7 and elsewhere in the DEIR. This would also include a local funding mechanism for operations and maintenance of a centralized facility. A centralized facility could provide additional community benefits such as open space and flood control.

Compare this to a decentralized system of pollution controls in the public rights-of-way, developed by different proponents of subsequent projects over time, and with yet unknown funding for operations and maintenance. This could result in different types of single-purpose facilities spread over the Project site with varying hydrologic, pollution control, and maintenance efficiencies. Santa Ana Water Board staff strongly urges the City to pursue a comprehensive strategy instead. A1-6

Thank you again for the opportunity to comment on the DEIR. If you have any question regarding these comments, please contact me at Adam.Fischer@waterboards.ca.gov or at (951) 320-6363.

A1-7

Sincerely,

Adam Fischer

Digitally signed by Adam Fischer
Date: 2026.05.27 13:47:58 -07'00'

Water Boards

Adam Fischer, Supervisor
TMDL Implementation and MS4 Section

From: Zhai, Scarlett@DTSC
To: DACEY, MELINDA
Subject: CEQA Notice Distribution List
Date: Wednesday, June 17, 2026 4:21:16 PM
Attachments: image002.png
image003.png
image004.png
Costa Mesa Fairview Dev. Center Specific Plan_Draft EIR_June 2026.pdf

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Good afternoon Melinda,

I recently found this in my mailbox. It's a notice about a draft EIR for public comment for the Costa Mesa Fairview Development Center Specific Plan. I probably got on your distribution list when I was the Project Manager for a site nearby several years ago. Currently I don't have any projects within this area. It will be fine if you remove my information from your distribution list. DTSC has a CEQA coordinator who will identify the project team to reach out if I happen to have projects in Costa Mesa area in the future. Let me know if you need anything else from me. Thanks!

A2-1

Scarlett

Scarlett Zhai (she/her/hers), PhD., P.E.
Supervising Hazardous Substances Engineer I
Site Mitigation and Restoration/Cypress
714-484-5316
Scarlett.Zhai@dtsc.ca.gov
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630-4732
California Environmental Protection Agency

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report any suspicious activities to the Information Technology Department.

From: SoCalGasTransmissionUtilityRequest
To: DACEY, MELINDA
Subject: DCF: 1233-26-1017 / SCH No. 2025101405
Date: Monday, June 22, 2026 10:26:57 AM
Attachments: 1233-26-.pdf
1233-26-1017 GEN REQ.pdf
1233-26-1017 MAP REQUEST.pdf
1233-26-1017 MAP.pdf

Good morning,

Attached is a letter from the Transmission Department of SoCalGas stating that we have high pressure gas transmission facilities within your proposed project vicinity. Included is a map of the conflict area and our general requirements when performing work or planning projects near SoCalGas high pressure lines. Please note, dimensioning is not provided, and we do not share as-built maps.

A3-1

If additional assistance is required, please send a copy of the project plans for an engineer to review and advise.

Please reference the Document Control File number (DCF) on all future correspondence in regards to this project.

Thank you,
Nerses Papazyan
Pipeline Planning Assistant
Gas Transmission Technical Services

socalgas

PLEASE VISIT OUR INTERACTIVE WEBSITE TO VIEW OUR HIGH PRESSURE DISTRIBUTION AND TRANSMISSION LINES: SOCALGAS - NATURAL GAS PIPELINE MAP.

TO HELP THE ENVIRONMENT AND TO EXPEDITE RESPONSES, PLEASE SEND FUTURE PROJECTS AND CORRESPONDING ATTACHMENTS VIA EMAIL: SoCalGasTransmissionUtilityRequest@semprautilities.com

Please allow up to 60 days to receive a response to all future utility requests

NOTICE: This message is covered by the Electronic Communications Privacy Act, Title 18, United States Code, Sections 2510-2521. This e-mail and any attached files are the exclusive property of Sempra Energy and the sender, are deemed privileged and confidential, and are intended solely for the use of the individual(s) or entity to whom this e-mail is addressed. If you are not one of the named recipient(s) or believe that you have received this message in error, please delete this e-mail and any attachments and

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Transmission Technical
Services Department

9400 Oakdale Ave
Chatsworth, CA 91311
SC9314

June 22, 2026

Melinda Dacey
City of Costa Mesa
Melinda.Dacey@costamesaca.gov

Subject: **SCH No. 2025101405**

DCF: **1233-26-1017**

Southern California Gas Company (SoCalGas) Transmission Department operates and maintains high-pressure natural gas transmission pipeline(s) in the vicinity of your project. The pipeline is shown on the attached map(s). Please note, only the high-pressure transmission pipeline information is current on these atlas prints.

A3-2

Our Gas Distribution Department may have other gas facilities within your project area. To assure no conflict with the SoCalGas' distribution pipeline system, please contact

AtlasRequests/WillServeAnaheim@semprautilities.com.

A3-3

This is only a response to a gas facility map request; a review of potential conflicts associated with your request has not been conducted. Consequently, **this letter does not constitute clearance for any construction work near or around SoCalGas' pipeline(s)**. As your project plans are developed, you must notify SoCalGas - Gas Transmission Department regarding the improvements that are proposed near our pipeline(s) and within our easement(s) before you begin any construction, including potholing. In doing so, please allow sufficient time as there may be certain requirements that need to be incorporated into your project's design and could significantly affect your project construction schedule.

A3-4

Best Regards,
Nerses Papazyan
Pipeline Planning Assistant
SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com

SCG Transmission General Requirements

Transmission Technical
Services Department

9400 Oakdale Ave
Chatsworth, CA 91311
SC9314

June 22, 2026

Melinda Dacey
City of Costa Mesa
Melinda.Dacey@costamesaca.gov

Subject: **SCH No. 2025101405**

DCF: **1233-26-1017**

The following are general requirements provided when performing work or planning projects near SoCalGas high pressure lines. Please review requirements along with project plans and notify SoCalGas Transmission Department about any questions or conflicts.

It is highly recommended that communication is maintained with SoCalGas to address all conflicts. Depending on the specific scope of your project there may be less or more requirements that need to be discussed regarding your project.

1 - Consideration must be given to the safety of our pipeline(s) during all project stages.

2 - SoCalGas must have continuous and uninterrupted access to the pipeline(s) and easement(s). In addition, SoCalGas conducts routine patrols and surveys of the pipeline(s); SoCalGas needs drivable access along the pipeline(s)/easement(s).

3 - Buried pipelines must have a minimum cover of 3 feet and a maximum cover of 7 feet below finished grade. No change of grade whatsoever, even within these parameters, shall be made without prior approval of SoCalGas.

4 - Prior to SoCalGas approving encroachment onto its easement(s), SoCalGas must be furnished with final grading plans showing the depth of the pipeline(s) below the existing surface and the depth of the pipeline(s) below the proposed finished grade. These elevations must meet SoCalGas' requirements for buried pipelines.

5 - No permanent structures, such as buildings, block walls, foundations, gates, etc., shall be constructed within the easement or over the pipeline(s).

A3-5

SCG Transmission General Requirements

6 - There shall be no planting of trees or other deep-rooted plants within the easement(s) or over the pipeline(s).

7 - Substructures shall cross perpendicular to the easement(s). Substructure crossings must provide a minimum of 18-inches vertical clearance from the pipeline(s). Additional separation is required for leach lines, fuel lines, etc.

8 - Parallel encroachments within the easement(s) are prohibited. In areas where a parallel substructure is being constructed outside of the easement(s), SoCalGas requires five feet of separation, with three feet of undisturbed fill, in order to protect the integrity of our facilities and allow the facilities to be safely accessed during inspection, maintenance, and repair. Additional separation may be needed for leach lines, fuel lines, high voltage electric, etc.

9 - All encroachments onto SoCalGas' easement(s) must have written approval of SoCalGas prior to construction or encroaching onto the easement(s).

10 - All work within the SoCalGas easement(s) and/or within 10 feet of the pipeline(s) must be witnessed by a SoCalGas representative, and no work will be allowed without the SoCalGas representative on site.

A3-5
CONT'D

11 - No heavy equipment shall cross the pipeline(s) without SoCalGas' approval. Additional protective measures may be required where heavy equipment is expected to cross the pipeline(s).

12 - No mechanical equipment shall operate within three horizontal feet of the pipeline(s), and any closer work must be performed by hand.

13 - No mechanical equipment shall operate within two vertical feet of the pipeline(s), and any closer work must be performed by hand.

14 - Buried pipeline(s) shall not be left exposed, and exposed pipeline(s) shall not be buried, without prior inspection and approval by SoCalGas. If the pipeline(s) are exposed during construction (e.g. substructure crossings, etc.), the pipeline must be backfilled with sand or zero-sack slurry only.

15 - No vibratory compaction is permitted over the pipeline(s). In rare cases, vibratory compaction may be approved by SoCalGas' Engineering Department following review of detailed site conditions, pipeline data, and equipment specifications.

16 - All contractors and subcontractors must be notified of the presence of the pipeline(s).

17 - Contractors and subcontractors must call DigAlert (811) at least 2 working days prior to construction, grading, or excavation.

18 - Once approved, encroachments within SoCalGas' easement(s) shall be documented in an easement amendment or other document, as deemed appropriate by SoCalGas' Land Services Department.

SCG Transmission General Requirements

In addition to the previous requirements, SoCalGas recommends the following:

19 - Potholes should be made, as necessary, to establish the horizontal and vertical alignment of the pipeline(s) within the project area. This information should be indicated on the plans, as needed. CAUTION: SoCalGas personnel must be present during potholing operations. Arrangements for SoCalGas personnel to stand by during potholing activities can be made by calling DigAlert at 811.

20 - Consideration should be given to building setbacks from the easement lines. A minimum 15-foot setback is recommended whenever possible.

21 - All potential buyers or tenants of the property should be made aware of the presence of the pipeline(s) and easement restrictions.

A3-5
CONT'D

Best Regards,

SoCalGas Transmission Technical Services

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE FAIRVIEW DEVELOPMENTAL CENTER SPECIFIC PLAN

DATE: May 14, 2026

TO: State Clearinghouse, Responsible Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Availability of a Draft Environmental Impact Report for the Fairview Developmental Center Specific Plan Project (SCH No. 2025101405) Located at 2501 Harbor Boulevard, Costa Mesa

PUBLIC REVIEW PERIOD: May 14, 2026, through July 1, 2026

Notice is hereby given, pursuant to Public Resources Code Section 21092 and the State California Environmental Quality Act Guidelines (CEQA Guidelines) (Title 14 of the California Code of Regulations, Section 15087), that the City of Costa Mesa (City) has completed the Draft Environmental Impact Report (EIR) for the Fairview Developmental Center Specific Plan (proposed project) (State Clearinghouse No. 2025101405) described below, and that the Draft EIR is available for public review.

COMMENT PERIOD: Agencies, organizations, and the public must submit comments in response to this notice within the **48-day public review period beginning May 14, 2026, and ending at 5:00 p.m. on July 1, 2026**.

All comments must be submitted in writing via mail, or email to:

Attn: Melinda Dacey, Principal Planner
City of Costa Mesa
Economic and Development Services Department
77 Fair Drive
Costa Mesa, CA 92626
Melinda.Dacey@costamesaca.gov

All parties that have submitted their names and mailing addresses will be notified of the availability of the Final EIR. If you wish to be placed on the mailing list, have any questions, or need additional information, please contact Melinda Dacey at (714) 754-5611 or by email, as noted above.

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MAY 21 2026
1233-26-

DOCUMENT AVAILABILITY: Copies of the Draft EIR, along with documents referenced in the Draft EIR, are available during the 48-day public review period at the following locations:

- City of Costa Mesa Development Services Department, at 77 Fair Drive, 2nd Floor, Costa Mesa, CA 92626
- City of Costa Mesa website: https://www.costamesaca.gov/government/departments-and-divisions/economic-and-development-services/planning/environmental-notices-and-reports
- Mesa Verde Library, 2969 Mesa Verde Drive, Costa Mesa, CA 92626
- Costa Mesa/Donald Dungan Library, 1855 Park Avenue, Costa Mesa, CA 92627

PROJECT LOCATION: The Fairview Developmental Center Specific Plan (FDCSP) covers approximately 95 acres of the Fairview Developmental Center (FDC) at 2501 Harbor Boulevard in Costa Mesa, Orange County (project site). The project site is west of Harbor Boulevard and is surrounded by the Costa Mesa Country Club to the east, south, and west; and residential uses owned and operated by California Department of Developmental Services (DDS) uses to the north. The Department of General Services southern regional emergency operations center (SREOC) is southwest of the project site within the former boundaries of the FDC.

PROJECT DESCRIPTION: The proposed project is a specific plan that would guide the development of a mixed-income mixed-use community on the project site, pursuant to the requirements of State Government Code Section 14670.31. The proposed project is also intended to facilitate housing development that would meet a significant portion of the City's Regional Housing Needs Allocation (RHNA) obligation while ensuring that resident needs are met with commercial services, open space amenities, and public safety infrastructure. In compliance with the project site's RHNA obligation, the proposed project would allow for development of a minimum of 2,300 dwelling units. The Draft EIR analyzes a maximum development scenario, including up to 4,000 dwelling units, 35,000 square feet of nonresidential uses, 9,926 residents, and 74 employees. As part of the disposition process for the project site, the state will initiate a process to select a Master Developer for the site who may purchase or lease the property. A 15-acre portion of the site would remain within the state's jurisdiction under DDS to develop new housing for the developmentally disabled. The following are categories of land uses allowed under the FDCSP:

- **Residential.** Housing would include a variety of product types ranging from two- and three-story townhomes and courtyard-style units, in addition to senior living options (independent and assisted living), and neighborhood-serving amenities, recreational uses, and daycare facilities. 200 housing units developed at the project site are required to be Permanent Supportive Housing, in accordance with State Government Code Section 14670.31.
- **Commercial.** Commercial uses would be permitted as either stand-alone buildings or in a vertical mixed-use configuration. Permitted uses would include neighborhood-serving retail and restaurants, coffee shops, small-format grocery stores, pharmacies, fitness studios, small medical and professional offices, childcare facilities, and other community-serving uses.
- **Open Space.** The FDCSP requires the development of at least 14 acres of publicly accessible open space, including neighborhood parks and plazas, trails for walking and biking, recreation centers and cultural amenities, and pocket parks and informal gathering areas. Private and common open space for residential uses under the proposed project would also be required.

The proposed project would include two primary access points: one at Fairview Drive on the northeast portion of the project site (existing), and a second access road planned as a new street connecting to the existing intersection at Harbor Boulevard and the Harbor Shopping Center Driveway on the southeast portion (proposed). An emergency-only access would also be provided from Merrimac Way, which is a privately maintained road. This connection to the project site would be gated when not in use. The secondary access at Harbor Boulevard would require construction of the roadway through the adjacent golf course and would involve reconfiguration of up to six holes to maintain course operations while meeting circulation and emergency access requirements, which encompasses approximately 45 acres. Additionally, the proposed project includes the Shelley Circle Trail, which would begin on-site along the east side of the project site and extend along the site's perimeter to connect with Tanager Drive off-site. The off-site portion of the trail, which runs along the property line and connects to the existing Tanager bike trail, would be approximately 4,650 linear feet in length and constructed as an 8- to 10-foot-wide, two-way multiuse path accommodating pedestrians, strollers, bicycles, and similar uses.

SIGNIFICANT ENVIRONMENTAL EFFECTS: The Draft EIR determined that the proposed project would result in potentially significant environmental impacts for the following environmental topic areas:

- Air Quality*
- Biological Resources*
- Cultural Resources*
- Geology and Soils
- Greenhouse Gas Emissions*
- Hazards and Hazardous Materials
- Noise
- Transportation
- Tribal Cultural Resources

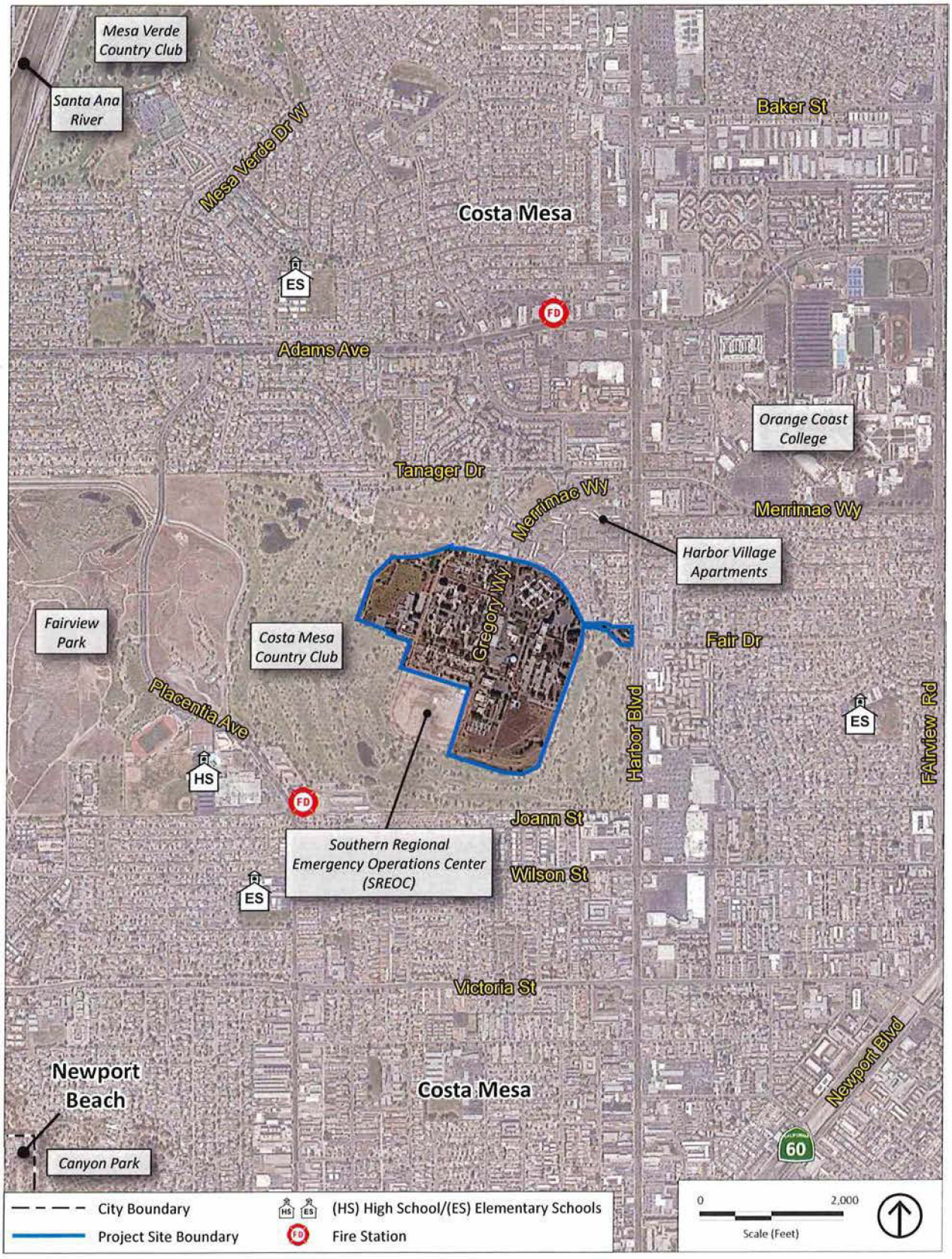
* = topic areas that could not be mitigated to less than significant.

ATTACHMENTS:

Figure 1, Local Vicinity Map

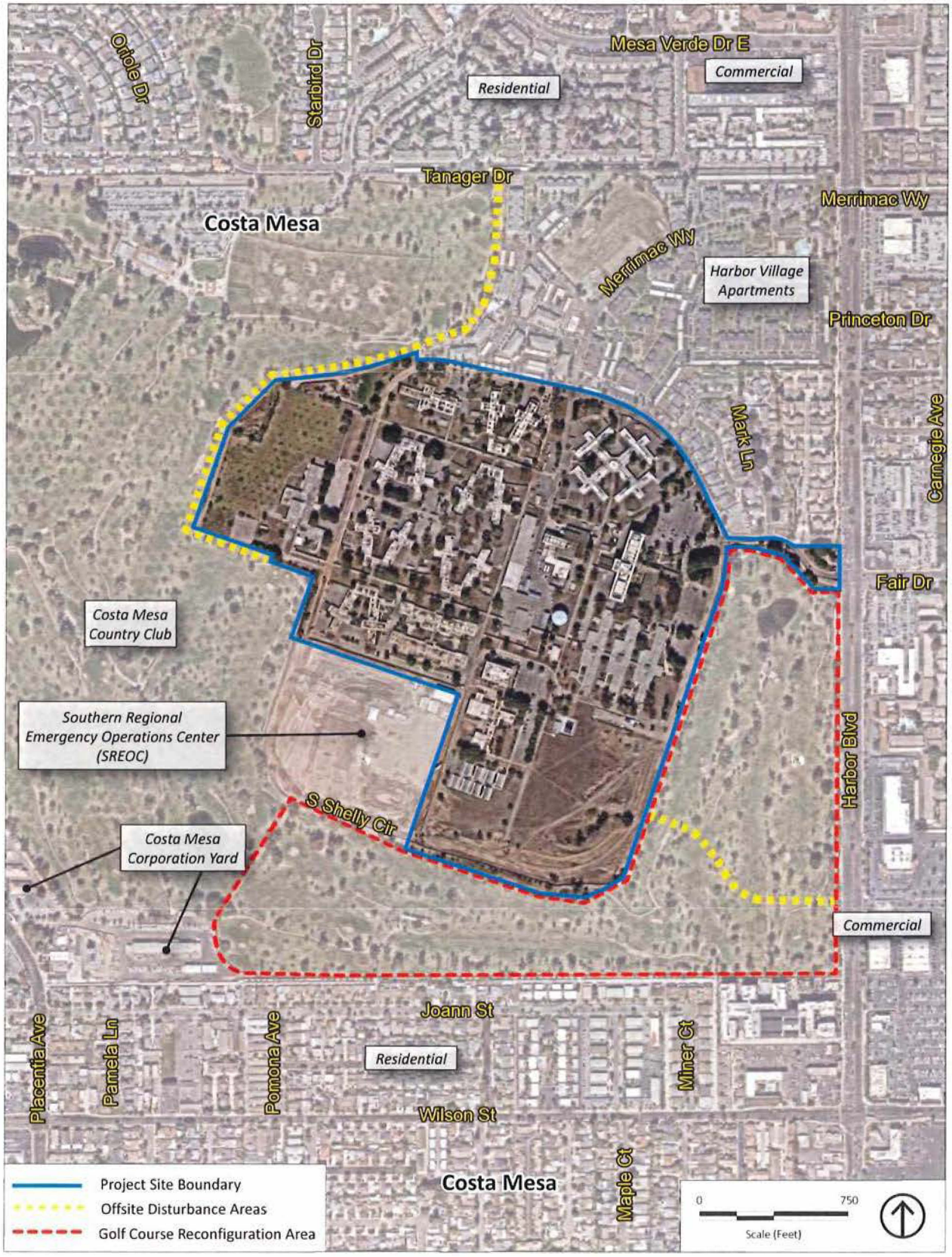
Figure 2, Aerial Map

Figure 3, Conceptual Land Use Plan



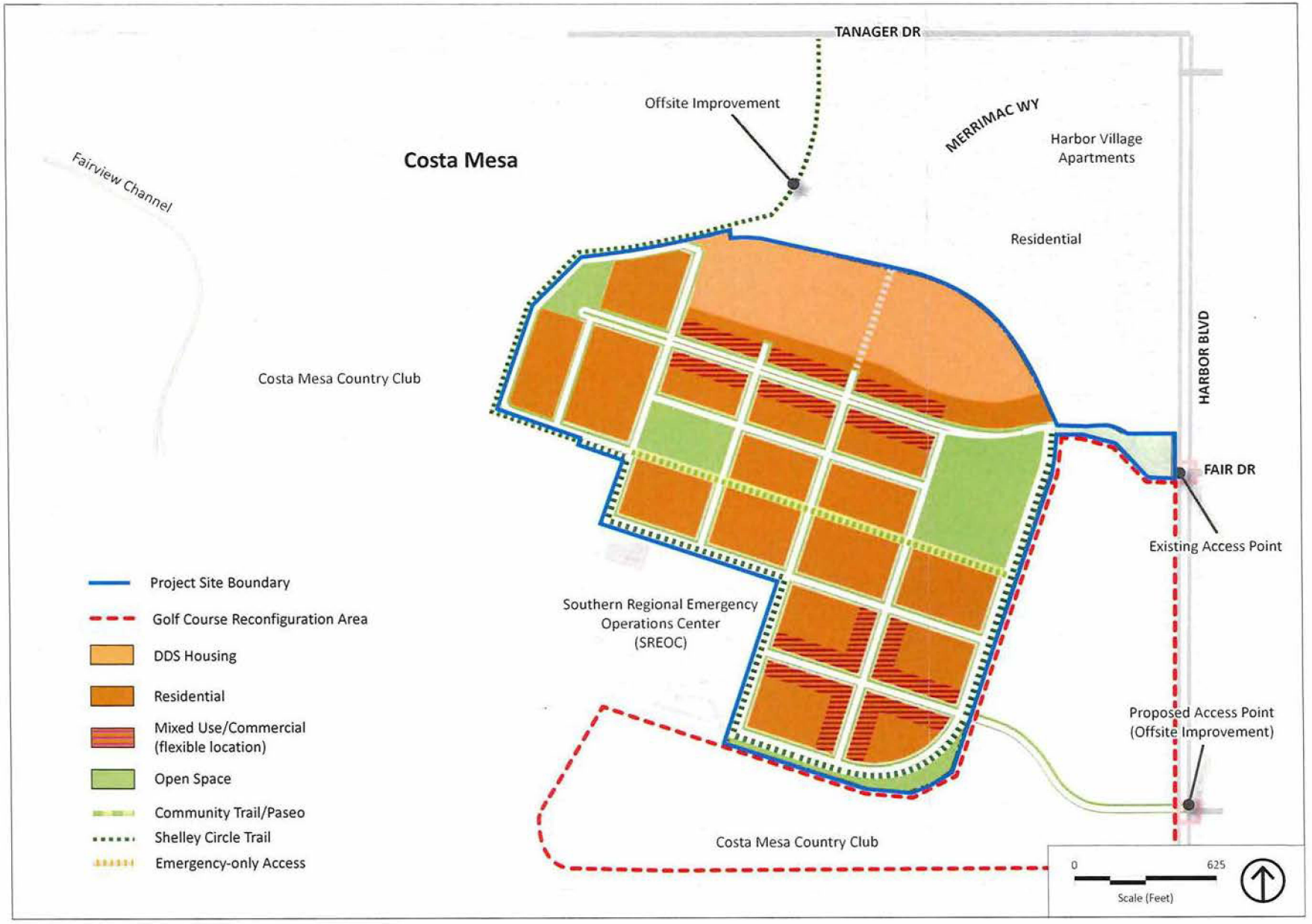
Source: Nearmap 2025.

Figure 1
Local Vicinity



Source: Nearmap 2025.

Figure 2
Aerial Map



Source: City of Costa Mesa 2025.

Figure 3
Conceptual Land Use Plan

Docusign Envelope ID: C011E551-C959-8F2B-833D-1FD5A8315597

County Administration South
601 North Ross Street
Santa Ana, CA 92701

P.O. Box 4048
Santa Ana, CA 92702

(714)667-8800

projectinfo@pw.oc.gov

pw.oc.gov

Administrative Services

OC Agricultural Commissioner's Office

OC Construction

OC Environmental Resources

OC Development Services

OC Facilities Design & Construction Management & CUF

OC Public Works

June 26, 2026

Sent via Email: Melinda.Dacey@costamesaca.gov

Melinda Dacey, Principal Planner
City of Costa Mesa
Economic and Development Services Department
77 Fair Drive
Costa Mesa, CA 92626

Subject: NCL-26-0006 – Notice of Availability of a Draft Environmental Impact Report for the Fairview Development Center Specific Plan Project (SCH No. 2025101405)

Dear Melinda Dacey,

Thank you for the opportunity to comment on the Notice of Availability of a Draft Environmental Impact Report for the Fairview Development Center Specific Plan Project (SCH No. 2025101405) (Project). The County of Orange (OC) offers the following comments: A4-1

OC Public Libraries:

OC Public Libraries anticipates the scale of the proposed development to significantly increase usage at nearby OC Public libraries services. The proposed Project is planned to add approximately 2,300–4,000 new housing units and an estimated 10,000 new residents within the service areas of the Mesa Verde Library and the Donald Dungan Library. The libraries are located less than two miles from the Project site. A4-2

1. As essential community hubs offering educational resources, technology access, cultural programming and public gathering spaces, these libraries must be evaluated for capacity, functionality, and readiness to support projected population growth.
    a. The Mesa Verde Library, built in 1965 and approximately 6,450 sq. ft., faces structural and functional limitations. Given its age, size, and projected population increases, modernization—or potential expansion—may be warranted. A4-3
    b. Given anticipated increases in foot traffic and service requests, Donald Dungan Library may require evaluation of staffing levels to maintain acceptable service ratios, and demand on technology stations, public computers and service counters to ensure high quality, accessible library services for current and future residents. A4-4

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OC Infrastructure Programs – Flood Plain Management and Hydrology:

Within the project limits, OC Flood Control District (OCFCD) facilities: D03 (Greenville-Banning Channel) and D04 (Fairview Channel) will be impacted by the proposed Project. Section 3.17 of the DEIR indicates that installing a new connection to the Fairview Channel is an option. Please note that any potential impacts to OCFCD facilities (hydraulics, structures, right-of-way, access, operations and maintenance, future repairs or improvements, etc.) should be identified and appropriately mitigated in consultation with OC Public Works. An OC Property Permit is required for the proposed Project. For information regarding the permit application process, please refer to the Encroachment Permits website https://myoceservices.ocgov.com/. Technical reviews and approvals for the proposed Project will be accomplished within the permit process. A4-5

Thank you again for the opportunity to review the DEIR. If you have any questions regarding these comments, please contact Virginia Gomez at (714) 667-1614 for OC Development Services, Julie Oakley at (714) 566-3024 for OC Public Libraries, Alison Camara at (714) 975-4289 or Tai Bui at (657) 898-3134 for OC Infrastructure Programs. Please continue to keep the County of Orange on the distribution list for future notifications related to the proposed Project. A4-6

Sincerely,

DocuSigned by:
Virginia Gomez
ED76DCA58AD94B6...

Virginia Gomez, Senior Planner
OC Public Works/OC Development Services
601 North Ross Street
Santa Ana, California 92701
Virginia.Gomez@pw.oc.gov

cc: Cindy Salazar, Planning Division Manager, OC Development Services
Kylie Sanchez, Land Use Manager, OC Development Services
Julie Oakley, Administrative Manager, OC Public Libraries
Alison Camara, Senior Civil Engineer, OC Infrastructure Programs
Tai Bui, Civil Engineering Associate, OC Infrastructure Programs

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

July 1, 2026

Ms. Melinda Dacey
Principal Planner
Economic and Development Services Department
City of Costa Mesa
77 Fair Drive
Costa Mesa, CA 92626

Via email: Melinda.Dacey@costamesaca.gov

Subject: **Fairview Developmental Center Specific Plan Draft Environmental Impact Report (SCH No. 2025101405)**

Dear Ms. Dacey:

Thank you for providing the Orange County Transportation Authority with the opportunity to review the Draft Environmental Impact Report (DEIR) for the City of Costa Mesa's Fairview Developmental Center Specific Plan. The following comments are provided for your consideration:

- On page 2-39 of the DEIR, under section 'Public Transit', please make the following revisions: A5-1
  - Revise "Route 47 that stops at Harbor Boulevard and Wilson" to "Route 47 that stops at Wilson Street and Harbor Boulevard."
  - Revise "Route 178 that stops at Harbor Boulevard and Adams Avenue" to "Route 178 that stops at Adams Avenue and Harbor Boulevard."

Thank you for the opportunity to review this document. Should you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net. A5-2

Sincerely,

Dan Phu
Director, Transportation Planning and Analysis

DP:pv

Docusign Envelope ID: 5B90B896-9B7D-8688-80C2-BF7561BB796C

GAVIN NEWSOM
GOVERNOR

Cal OES
GOVERNOR'S OFFICE
OF EMERGENCY SERVICES

CAROLINE THOMAS JACOBS
DIRECTOR

July 07, 2026

Melinda Dacey, Principal Planner
Economic and Development Services Department
City of Costa Mesa
77 Fair Drive
Costa Mesa, CA 92626

Subject: Comments on the Fairview Developmental Center Specific Plan Draft Environmental Impact Report (DEIR) [SCH No. 2025101405]

Dear Principal Planner Dacey:

On behalf of the California Governor's Office of Emergency Services (Cal OES), we appreciate the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Fairview Developmental Center Specific Plan (FDCSP). As the State continues construction of the Southern Region Emergency Operations Center (SREOC) on the State-retained parcel, we want to ensure that the final Specific Plan supports the long-term functionality, safety, and resilience of this essential facility. A6-1

Because the SREOC serves a critical statewide role in coordinating life-safety operations and multi-agency emergency response across eleven Southern California counties and has 24/7 mission-critical responsibilities, the facility relies on reliable access, stable utilities, protected communications pathways, and construction practices that avoid disruption to its operations. This includes retaining the right to request a temporary partial or total work stoppage of construction when necessary to complete the state's mission. We offer the following comments with the goal of supporting the City's planning efforts while ensuring continuity of essential emergency services for more than 23 million Californians.

1. **Development and Design Standards: Golf Netting Study**

The DEIR acknowledges potential need for enhanced golf netting, but existing conditions show current netting is inadequate. Since April 2025, over 3,000 errant A6-2

Docusign Envelope ID: 5B90B896-9B7D-8688-80C2-BF7561BB796C

golf balls have struck the SREOC construction site, confirming multiple holes and insufficient netting coverage. It is unclear in the DEIR who will be responsible for the installation, operation, and maintenance of the currently deficient, as well as future enhanced, golf ball netting. The State assumes that City or its golf course operator will address the current deficiency as well as any necessary future enhancements and that these costs will not be borne by, nor passed on to, the Fairview Specific Plan development. The State has owned and operated a residential care facility at this location since the 1950's, which preceded the City's construction a public golf course on land transferred to it by the State in the 1980's. Because the SREOC relies on unobstructed communications pathways, Cal OES requests that all proposed netting improvements—including pole height, location, and materials—be reviewed and approved by Cal OES Public Safety Communications to ensure they do not interfere with line-of-sight communications.

A6-2 CONT'D

- **DEIR Reference:** Development and Design Standards, Fencing, p. 90.
- **Requested Revision:** Require a golf netting study for the specific plan area which should be reviewed by Cal OES PSC for communication line of sight; clarify within the Specific Plan as to who is responsible for installation of enhanced netting as well as ongoing maintenance, repair, and replacement of golf netting to ensure continuous protection of existing and future surrounding uses.

2. Air Quality

Construction is anticipated to take up to 18 years. Construction activities, particularly grading, may generate dust that could affect the SREOC's HVAC systems and staff. To minimize potential impacts on staff and equipment, we recommend measures such as continuous dust monitoring and perimeter misting during grading within 500 feet of the facility.

A6-3

- **DEIR Reference:** Air Quality, p. 141.
- **Requested Revision:** When grading within 500 ft of SREOC require continuous dust monitor and employ continuous perimeter misting when applicable. Establish a developer-funded program to reimburse SREOC for accelerated HVAC filter replacement to protect staff and sensitive equipment.

Docusign Envelope ID: 5B90B896-9B7D-8688-80C2-BF7561BB796C

3. Hazards and Hazardous Materials

Comment: Demolitions displace established rodent colonies and disturb insect nests. The vibrations, machinery, and lack of food sources force these pests into adjacent undisturbed structures.

A6-4

- **DEIR Reference:** Hazards and Hazardous Materials, p. 335.
- **Requested Revision:** Require a Comprehensive Vector Control and Extermination Plan before and during demolition of adjacent FDC buildings to prevent pest migration into SREOC.

4. Air Quality

Comment: The DEIR does not describe how airborne contaminants from demolition, such as asbestos, silica, and diesel particulate matter, will be monitored and controlled near the SREOC.

A6-5

- **DEIR Reference:** Hazards and Hazardous Materials, p. 335.
- **Requested Revision:** Require real-time perimeter air monitoring for asbestos, silica, diesel PM at the adjacent SREOC property lines during major abatement and/or grading activities.

5. Hydrology: Stormwater Drainage & SREOC Protection

To ensure that stormwater flows do not inadvertently affect SREOC operations, we suggest incorporating "no-impairment" criteria into the master grading and hydrology plan for both typical and extreme storm events.

A6-6

- **DEIR Reference:** Hydrology and Water Quality, p. 371.
- **Requested Revision:** Cal OES requests a mitigation measure requiring "no-impairment" drainage criteria for the SREOC in the master grading/hydrology plan.

6. Noise: Operational Disclosure & Sound Mitigation

Comment: Lead agencies have discretion to account for environmental conditions that will definitively exist at the time the new project is implemented. If a building under construction, such as the SREOC, is near completion or assured to be finished, the analysis should assess the post-completion condition. It is unclear whether the noise analysis and proposed mitigation measures account for post-construction conditions, including routine generator testing and emergency generator operations at the SREOC.

A6-7

- **DEIR Reference:** Noise, p. 421.

Docusign Envelope ID: 5B90B896-9B7D-8688-80C2-BF7561BB796C

- **Requested Revision:** Measures such as residential disclosures, sound attenuation for future adjacent buildings, and a vibration monitoring plan for heavy construction within 500 feet would help reduce potential conflicts.

A6-7 CONT'D

7. Noise: Vibration Control and Monitoring Plan

Comment: The SREOC will contain sensitive equipment necessary to ensure its continuous operation as an emergency operations center. Vibration from heavy construction can cause significant disruptions to sensitive equipment. Ground shock waves can travel hundreds of feet, leading to imaging distortions, critical miscalibration, data errors, and permanent component damage in delicate devices and sensitive equipment.

A6-88

- **DEIR Reference:** Noise, p. 421.
- **Requested Revision:** Require a Vibration Control and Monitoring Plan for any heavy earthwork or foundation construction within 500 ft of the SREOC.

8. Intersection Improvements: SREOC Backflow Assembly

Comment: Protection of the SREOC backflow assembly at Harbor Blvd and Fair Drive must be ensured.

A6-9

- **DEIR Reference:** Intersection Improvements, Figure 3.15-5, p. 533.
- **Requested Revision:** Require protection of SREOC backflow assembly at Harbor Boulevard and Fair Drive in intersection improvement plans.

9. Aesthetics: Light/Glare

Comment: The DEIR evaluates project-related light and glare but does not account for visibility into, or complaints about, the State's essential facility.

A6-10

- **DEIR Reference:** Aesthetics, pp. 127–131.
- **Requested Revision:** Require architectural shielding, deep setbacks, or blackout shading for residential buildings facing or with direct sightlines to the SREOC.

Cal OES respectfully requests that the City revise the DEIR and FDCSP to incorporate the mitigation measures and standards outlined herein, particularly utility and stormwater no-impairment criteria, enhanced air quality and vector control safeguards, and enforceable operational disclosure requirements.

A6-11

Docusign Envelope ID: 5B90B896-9B7D-8688-80C2-BF7561BB796C

Principal Planner Dacey
July 07, 2026

In addition to the comments and requests herein, enclosed is a document containing operational constraints and requests related to the development process and to a fully functional completed project.

These adjustments will ensure the FDCSP advances the City's housing and community goals while fully preserving the readiness and resilience of the SREOC, an essential State facility protecting lives and property across Southern California.

A6-11
CONT'D

We appreciate your consideration and look forward to continued collaboration.

Sincerely,

DocuSigned by:
Eric Swanson
282416AD40C14F5...

ERIC SWANSON
Deputy Director, Finance and Logistics Administration
California Governor's Office of Emergency Services

Enclosure/Attachments: Operational Constraints

Essential Service Facility Context

The Southern Region Emergency Operations Center (SREOC) is an essential State facility responsible for coordinating life-safety operations, resource deployments, and multi-agency emergency response across eleven Southern California counties. As a 24/7 mission-critical installation, the SREOC must maintain uninterrupted functionality during both routine operations and severe regional disasters—including earthquakes, wildfires, floods, grid failures, and public safety emergencies. Because it serves as the operational backbone for emergency coordination for more than 23 million Californians, the SREOC requires uniquely reliable access, redundant utilities, protected communications line-of-sight, hardened security perimeters, and construction phasing that prevents any disruption to its command, dispatch, or logistics functions. These requirements are fundamental to ensuring the State can fulfill its statutory emergency response responsibilities. Accordingly, we have identified additional concerns regarding the proposed surrounding construction that may result in operational constraints. A6-12

1. SREOC Access

1.1. **Constraint:** Buildout of the Fairview Developmental Center Specific Plan is anticipated to take as many as 18 years, constructed in phases. Construction activities can frequently result in impacts to traffic and circulation in the surrounding areas. Physical access to the SREOC is critical and necessary, 24 hours per day, 7 days per week.

Request: The City should include Cal OES as a consulting/approving agency on all Construction Traffic Management Plans (CTMPs) to guarantee SREOC access is never compromised during the up to 18-year construction timeline.

1.2. **Constraint**: As shown in the DEIR, there are currently only two (2) access points into the FDCSP area: from Merrimac/Gregory and from Fair/Harbor. The land use plan and conceptual site plan for the FDCSP contemplate an additional future access point east of the SREOC through the existing golf course, exiting on Harbor Boulevard. The EOC requires two points of ingress/egress be available/operational at all times, and that both points of access can accommodate the turning radius of a Caltrans designated “Black” California Legal truck with a maximum length up to 65’ . A6-13

Request: Cal OES requests development of a formal notification process for EOC emergency activations that would trigger implementation of agreed-upon measures such as pre-planned signal overrides and traffic control deployments, event/crowd management (if necessary) and temporary trail closures during SREOC activations.

2. Specific Plan Building Height(s)

2.1. **Constraint:** The Specific Plan proposes development of structures of varying heights. The SREOC utilizes various communications methods, including microwave and radio, which are tower mounted and require a clear line of sight for uninterrupted communications. CalOES has provided an analytical report titled *"Microwave Path Clearance Report"* to inform the City and its planning team of the clearances necessary. CalOES seeks assurances that no structure be permitted at such a height as to interfere with the necessary line of sight for the communications tower at the SREOC. A6-14

Request: Establish a building height threshold that triggers Cal OES review to ensure any proposed structure over a predefined height does not interfere with essential SREOC communications. Require RFI studies for mid-rise/mixed-use parcels to prevent radio frequency interference with SREOC emergency communications.

2.2. **Constraint**: To ensure essential operations are uninterrupted additional measures are needed to prevent radio frequency interference at the SREOC from unauthorized drones. A6-15

Request: The City implement a "No Drone Zone" or geofencing ordinance over the FDCSP to protect SREOC communications.

3. Utilities

3.1. **Constraint**: It is unclear whether phased utility demolition and construction, including water and sewer, will ensure uninterrupted power, water, sewer, and fiber service to the SREOC. The SREOC backflow assembly at the Harbor/Fair intersection is not depicted on various intersection and utility exhibits in the draft Plan not the draft EIR. A6-16

Request: The City and Mesa Water District should require utility isolation, trenchless construction methods, and contingency plans including restrictions on daytime construction, in conjunction with construction/connection permit issuance to ensure SREOC utility continuity. Ensure that SREOC utilities are depicted on all necessary exhibits and plan sets.

3.2. **Constraint:** It is unclear whether new infrastructure sizing is sized to exceed cumulative demand. It is imperative to that pressurization of SREOC utilities, including the fire suppression system and domestic water supply, is uninterrupted. A6-17

Request: CalOES be provided written guarantees from the City and Mesa Water District that no depressurization of SREOC fire suppression or domestic water supply occurs due to construction activities or improper utility sizing.

4. SREOC Perimeter Security and Buffer

4.1. **Constraint:** Perimeter security and controlled access are paramount to uninterrupted emergency operations. The Land Use Plan in the draft Specific Plan does not depict any buffer between the SREOC and surrounding land uses, which are predominantly medium- and high-density residential developments.

A6-18

Request: City revise the Land Use Plan to include a security setback or buffer zone (i.e. landscape buffer) to preclude residential backyards, public parks, or high-density pedestrian trails directly against the SREOC perimeter fence. Recommend a "security setback" or "transitional landscape buffer." City could add a non-accessible "security setback" (20–30 ft, with planting except for a 5 ft clear zone next to the SREOC fence).

5. Work Stoppage

5.1. **Constraint:** Because the SREOC serves a critical statewide role in coordinating life-safety operations and multi-agency emergency response across eleven Southern California counties and has 24/7 mission-critical responsibilities, the facility relies on reliable access, stable utilities, protected communications pathways, and construction practices that avoid disruption to its operations.

A6-19

Request: Cal OES requests retaining the right to request a temporary partial or total work stoppage of construction when necessary to complete the state's mission.

From: Joyce Perry <j.perry@kaamalam.com>
Sent: Friday, July 10, 2026 11:14 AM
To: jkelley@placeworks.com; DACEY, MELINDA <Melinda.Dacey@costamesaca.gov>
Cc: Joyce Perry <kaamalam@gmail.com>
Subject: Re: Notice of Availability of a Draft Environmental Impact Report for the Fairview Developmental Center Specific Plan

Good Morning,

Thank you for providing the DEIR for the Fairview Developmental Center Specific Plan.

We approve of the language of the mitigation measures related to tribal cultural resources, but ask that should multiple consulting tribal nations express an interest in monitoring, monitors from each interested group be retained.

A7-1

To ensure timely coordination, we respectfully request to be contacted prior to any ground disturbance, once the contracting process for tribal monitors begins. Please let us know who will be managing that portion of the project and how best to initiate the necessary agreements.

A7-2

We look forward to working together to ensure protection of cultural resources.

---------- Forwarded message ---------
From: **Jennifer Kelley** <jkelley@placeworks.com>
Date: Wed, May 13, 2026 at 3:55 PM
Subject: Notice of Availability of a Draft Environmental Impact Report for the Fairview Developmental Center Specific Plan
To:
Cc: DACEY, MELINDA <Melinda.Dacey@costamesaca.gov>

To State Clearinghouse, Responsible Agencies, Tribes, Organizations, and Interested Parties:

The City of Costa Mesa requests your review and consideration of the Draft Environmental Impact Report (EIR) for the Fairview Developmental Center Specific Plan (proposed project) and invites input and comments regarding the Draft EIR pursuant to the California Environmental Quality Act (CEQA). Please submit any comments in writing to the City no later than 5:00 PM on July 1, 2026. The Notice of Availability (NOA) is attached to this email and the Draft EIR is available for review online at:
https://www.costamesaca.gov/government/departments-and-divisions/economic-and-development-services/planning/environmental-notices-and-reports
All comments must be submitted in writing via mail, or email to:
Attn: Melinda Dacey, Principal Planner
City of Costa Mesa
Economic and Development Services Department
77 Fair Drive
Costa Mesa, CA 92626
Melinda.Dacey@costamesaca.gov
All parties that submit comments on the Draft EIR will be notified of the availability of the Final EIR, which will include responses to comments received. If you wish to be placed on the mailing list, have any questions, or need additional information, please contact Melinda Dacey at (714) 754-5611 or by email, as noted above.
Regards,

JENNIFER KELLEY
Senior Associate II

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1975–2025
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Joyce Stanfield Perry
Húu'uni 'óomaqati yáamaqati- Teach peace

Juaneño Band of Mission Indians, Acjachemen Nation- Belardes
Cultural Resource Director

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> suspicious activities to the Information Technology Department.

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Cultural Resource Director

LOZEAU DRURY LLP

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www.lozeaudrury.com
rebecca@lozeaudrury.com

June 5, 2026

Via Email
Melinda Dacey, Principal Planner
Planning Division
Economic and Development Services Department
City of Costa Mesa
77 Fair Drive
Costa Mesa, CA 92626
Melinda.Dacey@costamesaca.gov

Re: Comment on Draft Environmental Impact Report, Fairview Developmental Center Specific Plan (SCH 2025101405)

Dear Ms. Dacey:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Fairview Developmental Center Specific Plan (SCH 2025101405), which proposes the development of a specific plan consisting of 2,300 residential units, including 200 permanent supportive housing units, with the potential for up to 4,000 units, up to 35,000 square feet of commercial space, at least 14 acres of publicly accessible open space, and off-site improvements, located on 95 acres of the Fairview Developmental Center at 2501 Harbor Boulevard in the City of Costa Mesa ("Project"). O1-1

SAFER is concerned that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the City address these shortcomings in a revised draft environmental impact report and recirculate it prior to considering approvals for the Project. O1-2

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997). O1-3

Sincerely,

Rebecca Davis
Lozeau Drury LLP

COASTAL CORRIDOR ALLIANCE

6-30-26

Attn: Melinda Dacey, Principal Planner

City of Costa Mesa Economic and Development Services Department

77 Fair Drive

Costa Mesa, CA 92626

Introduction

The City of Costa Mesa is currently preparing the draft Environmental Impact Report (dEIR) for the Fairview Developmental Center Specific Plan (FDCSP) for the redevelopment of the Fairview Developmental Center (FDC), a closed State hospital, located in the heart of Costa Mesa, that served patients with developmental disabilities for several decades. The nearly 95-acre FDC campus is expected to see at least 2,300 units of housing built in the coming years, including up to 1,000 units of affordable housing. O2-1

Background

The Banning Ranch Conservancy (BRC) led the decades-long effort to protect and create a permanent public open space of the 401-acre Banning Ranch property, located at the mouth of the Santa Ana River between Costa Mesa, Newport Beach, and Huntington Beach. In December 2022, escrow closed on a conservation transaction, permanently protecting 387 acres of Banning Ranch. The $97 million real estate deal was negotiated and completed by The Trust for Public Land and made possible by an extremely generous private donation from Frank and Joan Randall. The title of the property was immediately transferred to the Mountains Recreation and Conservation Authority, a local Joint Powers Authority (JPA) that manages over 85,000 acres of parkland in Southern California. The property is now known as the Frank and Joan Randall Preserve (Randall Preserve). O2-2

In January 2024, BRC became the Coastal Corridor Alliance (CCA), with a new mission, "To protect biodiversity, foster community stewardship, and advocate for appropriate human access on the Randall Preserve and Santa Ana River Coastal Corridor." The change in name and mission reflects our organization's transformation into a stewardship role and indicates we have expanded our vision beyond Randall Preserve to include the properties of the Coastal Corridor from the Pacific Ocean up the Santa Ana River to Adams St. in Costa Mesa.

The Coastal Corridor Alliance offers these comments:

As stated in the first paragraph of the FDCSP Executive Summary, the State of California "…has prioritized housing to address the pressing need to increase housing supply for workforce…" at FDC.

The FDCSP should earmark up to 35 affordable units at FDC to be used as workforce housing for Newport-Mesa Unified School District (NMUSD) employees.

FDC is a superior option for workforce housing.

NMUSD is currently in the early stages of a proposal to build up to 35 units of workforce housing (as part of a controversial larger proposed development) on an 11.36-acre parcel of District-owned surplus land located on Banning Ranch. This proposal has met extensive public opposition due to documented sensitive California gnatcatcher, burrowing owl, and vernal pool habitat on these 11.36 acres, which are surrounded on three sides by Randall Preserve. The public's clear preference is that these 11.36 acres be preserved as open space.

O2-2 CONT'D

There are more preferable locations for NMUSD to build workforce housing than on the last remaining unprotected piece of the Banning Ranch mesa. FDC is a very logical alternative location, located approximately two miles away, and without the sensitive habitat found on the NMUSD 11.36 acres. Further, both properties are owned by public agencies.

A State agency is interested in leasing NMUSD's 11.36-acre open space parcel on Banning Ranch for conservation purposes.

Per requirements of the Surplus Land Act, NMUSD notified public agencies about the availability of the 11.36 acres. In a letter dated March 10, 2026, MRCA expressed its interest to begin negotiations with NMUSD concerning a long-term lease of the 11.36 acres.

In addition, CCA had earlier submitted a separate offer to purchase the 11.36 acres for conservation purposes.

In addition to leasing or purchasing the site, other options might include a conservation easement which would allow NMUSD to retain the site for educational purposes, yet guarantee its open space status.

A win-win-win-win outcome is possible.

1. Up to 35 units of workforce housing earmarked for NMUSD staff could be constructed at FDC, allowing NMUSD staff to afford to live in this community of relatively high-priced homes.

2. A long-term lease, outright purchase, or conservation easement of the 11.36 acres could bring revenue to NMUSD.

3. By being preserved as open space, the valuable habitat on the 11.36 acres could aid and supplement the rare species found on the adjacent Randall Preserve.

4. The 11.36 acres could serve as a wonderful site to teach NMUSD students about the rare California gnatcatcher, burrowing owl, and vernal pool habitat in their vicinity, and provide a "hands on" opportunity to work on habitat restoration and management, instilling a sense of stewardship among NMUSD students.

O2-2
CONT'D

Sincerely,



Terry M. Welsh, MD

President, Coastal Corridor Alliance



Location of Randall Preserve relative to FDC

COSTA MESA FIRST

Working for a Livable City

July 1, 2026

VIA EMAIL – Melinda.Dacey@costamesaca.gov

City of Costa Mesa
Attn: Melinda Dacey, Principal Planner
77 Fair Drive
Costa Mesa, California 92626

Re: Fairview Developmental Center Specific Plan Project Located at 2501 Harbor Boulevard, Costa Mesa; Draft Environmental Impact Report; SCH No. 2025101405

Dear Ms. Dacey:

We appreciate the opportunity to provide comments to Draft Environmental Impact Report ("DEIR") for the Fairview Developmental Center Specific Plan Project ("Project").

The Project would encompass approximately 95 acres of the 110 acres of Fairview Developmental Center and would establish a mixed-use community on the site. The development would include a minimum of 2,300 dwelling units, with a potential to accommodate up to 4,000 dwelling units.

O3-1

The site is currently zoned Multi-Use Center, which allows for low- to moderate-intensity urban uses with residential densities ranging from six to 40 dwelling units per acre ("du/ac") and a maximum .25 floor area ratio ("FAR") for nonresidential uses. A smaller portion of the site is designated Medium Density Residential, allowing up to 12 du/ac. The eastern portion of the site is zoned Planned Development Residential – High Density, allowing residential development at 20 or more du/ac.

Under the General Plan, development current permits up to 582 dwelling units and requires a minimum of 25 acres of open space. Existing uses on the site include institutional buildings, associated infrastructure, and recreational facilities, all with a 0.25 FAR.

Costa Mesa First (FPPC 1332564), P.O. Box 2282, Costa Mesa, CA 92628
costamesa1st@gmail.com
costamesa1st.com
(714) 549-5884

The Project is subject to the requirements of Senate Bills 82 and SB 188, including the provision of permanent supportive housing and affordable/mixed-income housing under the direction of the California Department of Developmental Services ("DDS") and the California Department of General Services.

The proposed land use plan under the Project consists of three major categories: residential, commercial, and open space. The allocation of the land uses across the site are:

- DDS Housing: **15** acres (to be constructed by State of California);
- Residential and Commercial: **45** acres;
- Open Space: **14** acres (minimum);
- Right-of-Way: **21** acres; and
- Total: **95** acres

O3-1
CONT'D

To ensure consistency with the City's General Plan and Zoning Code, amendments will be required to reflect full buildout of the Project. At maximum development, the site is estimated to accommodate an 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.

The Project is intended to provide a wide range of housing types serving diverse income levels, including two- and three-story townhomes, courtyard-style units, and apartment buildings up to 12 stories. This development would address a substantial portion of the City's Regional Housing Needs Allocation ("RHNA"). The proposed housing program includes:

a. **Very Low Income**: Minimum of 575 units, including 200 units of Permanent Supportive Housing in compliance with California Government Code Section 14670.31[1];

b. **Low Income**: Minimum of 345 units;

c. **Moderate Income**: Minimum of 690 units; and

d. **Above Moderate Income**: Minimum of 690 units

The Project would also provide independent and assisted living options for seniors.

The Project site is adjacent to the State of California's Emergency Operations Center, currently under construction on fifteen acres of the FDC property. That facility will include a 35,000-square-foot office building, a 20,000-square-foot warehouse, and a 120-foot communications tower.

Nearby amenities include a municipal golf course and an affordable housing neighborhood located approximately 600 feet from the Project site. Fairview Park, a nature preserve containing environmentally sensitive species and habitat areas, is situated approximately 1,800 feet from the proposed development.

O3-1 CONT'D

Introduction to Comments: We respectfully submit the following comments for the City of Costa Mesa's ("City") consideration. After careful review, we conclude that the DEIR is inadequate and fails to comply with the California Environmental Quality Act ("CEQA") in multiple respects. The DEIR omits critical analyses, relies on incomplete and outdated data, improperly defers mitigation, and fails to evaluate reasonable alternatives. It makes it impossible for the residents of Costa Mesa to understand and meaningfully consider the issues raised by the Project and any attempts by the City to mitigate significant environmental impacts associated with the Project. Accordingly, additional and more robust environmental review is required under CEQA.

O3-2

Further, serious concerns about the Project's compliance with applicable housing laws remain unaddressed and impede or constrict the ability of the City to comply with those laws and affirmatively further fair housing. Public engagement to date has also been minimal,

[1] A portion of these units is being developed on a 15-acre site retained by the DDS for individuals with developmental disabilities.

undermining CEQA's fundamental purpose of informing decision-makers and the public about potential environmental effects and avoiding significant, preventable environmental harm.

Additionally, the DEIR identifies the Project as the only feasible alternative when evaluating environmentally superior options; however, it fails to consider a previously proposed 3,800-unit alternative. That alternative was originally identified by the City as the preferred option following financial analysis of three scenarios, and it was only superseded by the 4,000-unit proposal after action on August 25, 2025 by the Costa Mesa Planning Commission for CEQA evaluation purposes. O3-2

For these reasons, we urge the City to reject the current Project and instead advance the previously identified 3,800-unit alternative or an alternative with even fewer housing units.

1. <u>The Statement of Project Objectives does not align with the Guiding Principles in the Draft Fairview Developmental Center Specific Plan</u>.

Section 15124(b) of CEQA Guidelines requires a statement of the objectives sought by the proposed project, which is more clearly defined as "[a] clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project." Objectives must articulate the "why" behind the project, capturing both the intent and anticipated benefits. O3-3

The DEIR identifies a set of Project objectives, with the primary purpose of transforming the site into "a mixed-use, mixed-income community" that addresses the City's housing needs while integrating commercial services, open space, and public infrastructure."[2] However, these Project Objectives are inconsistent with those set forth in the Draft Fairview Developmental Center Specific Plan ("FDCSP"). For example, FDCSP Principle #5, "Integrate the Natural and Built Environment," is not included among the Project Objectives in the DEIR. This inconsistency must be resolved to ensure alignment between the governing planning document and the environmental analysis. Moreover, any mitigation measures necessary to achieve these objectives and principles must be identified and analyzed in the DEIR.

In addition, the Project as currently proposed fails to satisfy its stated objective of enhancing open space and recreational access. The City's General Plan requires 4.26 acres of open space O3-4

[2] See Page 2-19, Section 2.5 of DEIR.

per 1,000 residents; however, the Project falls more than 28 acres short of this standard. As a result, the Project does not meet applicable open space requirements and undermines its own stated objectives. Reducing the number of proposed housing units would help bring the Project closer to compliance with the General Plan's open space requirements.

O3-4 CONT'D

2. <u>Project violates SB 188 by failing to prioritize affordable housing and open space on FDC property</u>.

In June 2022, the California Legislature adopted a budget that, among other provisions, provided funding to the City to support the planning and development of affordable housing at the FDC site.

Government Code Section 14670.31(a)(7) states "It is the intent of the Legislature that the Fairview Developmental Center property be utilized for a mixed-use development, including mixed-income housing. The development would include and <u>prioritize</u> <u>affordable housing</u>, including at least 200 units of permanent supportive housing, and <u>open space</u>." [emphasis added] This provision makes clear that affordable housing—particularly permanent supportive housing—and open space are to be central components of any redevelopment of the site.

Similarly, Government Code Section 14670.31(c)(4) provides "The agreement shall require that <u>housing</u> be a <u>priority</u> in the planning process and that any housing proposal determined to be appropriate for the property shall include <u>affordable</u> <u>housing</u>. The agreement and the development plan shall provide for housing and affordable housing at a level consistent with the January 2020 council-adopted strategy of 1,500 units and the housing assessment in the Department of General Services' 2021 Infrastructure Assessment of up to 2,500 units for the site." [emphasis added] This provision reinforces that the scale and composition of development at the site should remain aligned with prior analyses and strategies evaluating a substantially lower development intensity.

O3-5

As currently proposed, however, the Project conflicts with these legislative priorities, as well as Governor Newsom's Executive Order N-6-19, by advancing a development program that exceeds the scale contemplated in prior state and local planning efforts and fails to appropriately prioritize the balance of affordable housing and open space envisioned for the site.

3. <u>Wildlife surveys must be completed before Project approval; City has failed to analyze the whole of Project</u>.

CEQA requires the City to evaluate the environmental impacts of the entire Project, including "the whole of an action" that may result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. Please refer to CEQA Guideline Section 15378; *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1220. This requirement reflects CEQA's core principle that environmental review may not be fragmented or deferred. As the California Supreme Court has explained, "environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396.)

Here, the DEIR fails to adequately analyze the whole of the Project because it relies on incomplete and untimely biological surveys and defers necessary environmental analysis until after Project approval. O3-6

Appendix C.1 to the DEIR states that "In <u>October 2023</u> ECORP Consulting, Inc. (ECORP) conducted a biological reconnaissance survey for the Fairview Development Center (FDC) Project (Project) located in the City of Costa Mesa (City), Orange County, California and thereafter prepared a Biological Resources Existing Conditions Report (<u>January 2024</u> [revised <u>April 2024</u>]) for the Project." [emphasis added]. This survey was conducted prior to the Notice of Preparation for the DEIR and does not address the information requested in responses to the Notice of Preparation submitted in December 2025. Accordingly, the survey is not sufficient to support the DEIR's analysis or conclusions.

The deficiencies are particularly significant with respect to burrowing owl. Surveys for burrowing owl must be conducted during the appropriate seasonal period, including the species' wintering and nesting periods, not based solely on an October reconnaissance survey. The need for updated and protocol-level surveys is reinforced by nearby documented occurrences of burrowing owl, including information discussed in the "Biological Technical Memorandum CEQA Analysis, HSS Flying Field Relocation Project, City of Costa Mesa, Orange County, California," dated May 13, 2025, prepared by Hamilton Biological, Inc. for the City in connection with the Fairview Park Master Plan Update. That report is available on the City's website here: https://www.costamesaca.gov/home/showpublisheddocument/63320/639144533016830000. O3-7

The DEIR's own biological analysis confirms that suitable habitat exists on the Project site. Appendix C.1 states:

> "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 (OCC #874) was documented in 2006 and located approximately 0.4 mile west of the Project Site; the most recent record (OCC #2015) was documented in 2017 and located approximately 2.9 miles west of the Project Site."

O3-8

Despite these findings, the DEIR does not appear to account for other nearby documented burrowing owl activity, including the 2018 capture and banding of burrowing owls in Fairview Park, located a short distance from the Project site. That occurrence was reported by the *Daily Pilot* here: https://www.latimes.com/socal/daily-pilot/news/tn-dpt-me-cm-fairview-owls-20181213-story.html

We note that ECORP's 2023 survey listed sightings of other sensitive species, including Monarch butterfly. New surveys must be conducted following California Department of Fish and Wildlife ("CDFW") protocol to determine the presence of burrowing owls and other listed, threatened, or endangered species in the study area prior to Project approval. If present on site, development of the proposed project may result in significant direct impacts to these species, including burrowing owl, absent mitigation.

O3-9

The DEIR also acknowledges additional survey limitations. Section 3.2.2, "Survey Limitations," of Appendix C.1[3] states:

> "ECORP conducted the biological reconnaissance survey outside of the plant blooming period for special-status plants that were included in the literature review; however, based on the existing site conditions and by identifying plants by their vegetative characteristics, ECORP presumed these species absent. Additionally, ECORP conducted the survey outside of the Crotch's bumble bee

O3-10

[3] See Page 16 of Appendix C-1

> (CBB; Bombus crotchii) flight season and nesting bird season; therefore, ECORP determined these protected species to have potential for occurrence based on the habitat present within the Project Site and literature review observations of the species."

These admissions demonstrate that the DEIR's biological analysis is incomplete. Surveys were conducted outside the appropriate blooming period for special-status plants, outside the Crotch's bumble bee flight season, and outside nesting bird season. Nevertheless, the DEIR proceeds without requiring the necessary protocol-level surveys before Project approval. CEQA does not permit the City to approve the Project first and conduct the studies necessary to determine the existence and severity of significant impacts later. O3-10 CONT'D

The DEIR is also deficient because it fails to provide meaningful analysis of wildlife movement and habitat connectivity. Section 4.0, "Results," of Appendix C.1 states that the report summarizes the results of the literature review and field survey, including "site characteristics, vegetation communities, plants, wildlife, special-status species, and special-status habitats," including any potential wildlife corridors. However, the DEIR provides no meaningful data or analysis regarding wildlife movement on or near the Project site, despite the presence of nearby water features, open space, and habitat areas that may attract migratory birds and support local wildlife movement. The fact that burrowing owl surveys are necessary further underscores that the FDC site may be used by migratory birds and other wildlife. Habitat linkages, movement corridors, and migration routes between habitat areas must be evaluated, preserved where feasible, and supported by enforceable mitigation measures disclosed in the DEIR. O3-11

As currently drafted, the DEIR fails to analyze the Project's foreseeable direct and indirect impacts on special-status plants, Crotch's bumble bee, burrowing owl, nesting birds, migratory species, and local wildlife using the FDC site as habitat or as part of a wildlife movement corridor. New biological surveys must be conducted as part of the environmental review process and must cover all relevant seasonal periods, including blooming season, Crotch's bumble bee flight season, nesting bird season, and the appropriate survey windows for burrowing owl. O3-12

By relying on incomplete surveys and deferring critical biological analysis until after Project approval, the City has failed to proceed in the manner required by CEQA. The City may not postpone necessary studies or rely on vague future mitigation measures to address impacts that should be identified, analyzed, and mitigated before approval. Additional, accurate biological review is therefore required before the City may consider approving the Project.

Finally, the City should solicit and consider comments from the appropriate wildlife agencies, including the CDFW and the U.S. Fish and Wildlife Service, before certification of the EIR and approval of the Project. O3-13

4. <u>DEIR does not fully consider sensitive receptors and needed mitigation</u>.

The Project would permit development of a mixed-use community consisting primarily of high-density residential uses, along with commercial space, parkland, and a daycare facility serving seniors and low- and very low-income adults and children. The Project site is located near an existing affordable housing neighborhood on Joann Street (Census Tract 6059063808), where approximately 80 percent of residents are people of color.

CalEnviroScreen 4.0 ranks this census tract with a pollution burden score of 46 percent—an elevated level, particularly given its proximity to open space amenities such as a municipal golf course and coastal influences. The Project site is also near other census tracts with significantly higher pollution burdens, including Census Tract 6059063605, which has a score of 86 percent. In addition, a nearby high school and elementary school serve students from these census tracts and include sports fields, tennis courts, and a stadium that are also used by the broader community. Residents of these areas—including sensitive populations such as children and seniors—would be affected not only by long-term Project operations, but also by construction-related activities. O3-14

The DEIR acknowledges that air quality impacts would remain **significant and unavoidable** even after mitigation.[4] However, it fails to provide adequate analysis or enforceable mitigation measures addressing impacts to sensitive receptors, including those resulting from toxic air contaminants. This deficiency affects both existing nearby residents and future occupants of the Project, particularly vulnerable populations susceptible to adverse health outcomes such as asthma, cardiovascular disease, and cancer.

Although the DEIR states that mitigation measures will be identified through a future health risk assessment to be incorporated into grading plans, it does not identify what specific analyses, measures, or protections will be implemented prior to or during early phases of construction, including demolition. CEQA requires that feasible mitigation measures be identified and analyzed before Project approval, not deferred to future studies or plans. O3-15

Accordingly, the DEIR must be revised to include a comprehensive health risk assessment and clearly defined, enforceable mitigation measures addressing construction and operational impacts O3-16

[4] See Impact AIR-4, Page 3.2-45, Section 3.2.4 of DEIR.

to air quality and sensitive receptors. These measures must be incorporated into the DEIR and adopted prior to any demolition or construction activities. O3-16 CONT'D

5. <u>Cumulative impacts are not fully identified, or are missing from DEIR</u>.

CEQA requires that an Environmental Impact Report ("EIR") analyze cumulative impacts in a meaningful and comprehensive manner. CEQA Guidelines Section 15130(b)(1) provides that a cumulative impacts analysis must be based on either:

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 general plan or related planning document designed to evaluate regional or area-wide conditions. O3-17

Courts have repeatedly emphasized that an EIR must include all reasonably foreseeable projects that could contribute to cumulative impacts. In *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 120, the court held that an agency may not rely on an incomplete or improperly limited project list when evaluating cumulative impacts. Similarly, in *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 720–721, the court found an EIR inadequate where it failed to sufficiently analyze cumulative impacts, including traffic and air quality effects, from related projects in the surrounding area.

Although the DEIR identifies several related projects within the City of Costa Mesa—including projects associated with the "Neighborhoods Where We All Belong" Housing Element rezoning—it fails to adequately evaluate regional or area-wide cumulative conditions[5]. This deficiency stems from the omission of two major development projects located immediately adjacent to the City's boundaries in Santa Ana, which are reasonably foreseeable and would contribute to cumulative impacts within Costa Mesa. O3-18

These projects are substantial in scale. The Village at South Coast project includes 1,583 dwelling units, 80,000 square feet of retail space, and 300,000 square feet of office space. The Bristol Related project proposes 3,250 dwelling units, 350,000 square feet of commercial space, a 250-room hotel, and a 200-unit senior living project, with a floor area ratio of 2.7 and residential density of approximately 92 du/ac. Given their proximity and scale, O3-19

[5] See Pages 3-4 through 3-6, Section 3 of DEIR.

these projects would foreseeably contribute to cumulative impacts related to traffic, air quality, noise, and infrastructure demand within Costa Mesa.

CEQA prohibits agencies from ignoring such related projects or artificially limiting the scope of cumulative analysis. As the California Supreme Court explained, "an EIR must not ignore the cumulative impact of multiple projects" (*Kings County Farm Bureau*, supra, 221 Cal.App.3d at p. 720). O3-19 CONT'D

Here, available information indicates that these Santa Ana projects will generate substantial increases in vehicle miles traveled, yet no traffic impact fees will be paid to the City of Costa Mesa and no corresponding roadway improvements are planned within the City. Moreover, the City of Santa Ana committed to routing construction and project-related traffic away from nearby Santa Ana neighborhoods and toward regional roadways located within Costa Mesa, including Bristol Street, Sunflower Avenue, Bear Street, South Coast Drive, Fairview Road, and Harbor Boulevard. These facts underscore that the impacts of these projects will not be confined to Santa Ana, but will directly affect Costa Mesa residents and infrastructure. O3-20

Despite these reasonably foreseeable conditions, the DEIR does not meaningfully evaluate the cumulative impacts associated with increased traffic volumes, degraded air quality, or related environmental effects within Costa Mesa. Nor does it assess how these cumulative impacts may impair the City's ability to implement its General Plan policies or achieve applicable environmental goals. This omission renders the cumulative impacts analysis legally inadequate. (See *Communities for a Better Environment*, supra, 103 Cal.App.4th at p. 120.) O3-21

Accordingly, the DEIR fails to satisfy CEQA's requirements for a legally adequate cumulative impacts analysis. Sections 3.1 through 3.17 of the DEIR must be revised to incorporate all reasonably foreseeable related projects, including those in adjacent jurisdictions, and to fully evaluate the resulting cumulative impacts on transportation, air quality, and other environmental resource areas.

6. <u>Phase I and Phase II Environmental Reports are outdated, incomplete, and unreliable; the DEIR fails to adequately address contamination and construction-related risks</u>. O3-22

The Phase I and Phase II Environmental Site Assessments relied upon in the DEIR are more than five years old, having been commissioned by the State of California prior to significant changes in site conditions. Given ongoing activities at the site—including demolition, grading, and construction associated with separate State-led projects—it is necessary to reevaluate

current environmental conditions. Reliance on outdated reports undermines the accuracy and reliability of the DEIR's analysis of contamination and associated risks

O3-22 CONT'D

Further, the DEIR omits critical information by failing to include the draft Additional Phase II Investigation, dated November 26, 2021, prepared by Avocet Environmental, Inc. for the California Department of General Services ("Additional Phase II"). Although this report focuses on the Main Plant Operations Area, it identifies contamination that has the potential to affect other portions of the site if not properly managed.

The Additional Phase II emphasizes the need for a comprehensive Soil Management Plan, stating that it should include procedures for segregating, stockpiling, and characterizing soil suspected of being contaminated and screening levels for use in determining whether impacted soil, if encountered, can be reused onsite or must be transported offsite or disposal or to be recycled." [emphasis added] The DEIR does not adequately incorporate or analyze these recommendations, nor does it evaluate how failure to implement such measures could result in the migration or spread of contaminants during demolition and construction activities.

O3-23

The DEIR is also deficient because it fails to meaningfully analyze how demolition of existing structures and site grading could exacerbate existing environmental hazards, including the release of hazardous materials, contaminated dust, or subsurface pollutants. CEQA requires that such foreseeable impacts be identified, analyzed, and mitigated prior to Project approval. The DEIR's failure to do so results in an incomplete assessment of potential risks to workers, nearby residents, and the environment.

O3-24

Accordingly, updated Phase I and Phase II Environmental Site Assessments must be prepared to reflect current site conditions and to provide an accurate basis for environmental review. These updated reports must be incorporated into the DEIR and made available for public review.

Finally, because the inclusion of updated environmental analyses may disclose new or more severe impacts, the public comment period for the DEIR must be extended to ensure meaningful public participation and informed decision-making, consistent with CEQA's purposes.

O3-25

7. <u>The DEIR reveals significant and unavoidable impacts that cannot be fully mitigated; DEIR fails to address impacts and does not address population and housing impacts adequately</u>.

The DEIR identifies the following significant and unavoidable adverse impacts that would result from implementation of the proposed project:

a. <u>Impact AIR-1</u>: The proposed project would cumulatively contribute to the nonattainment designations in the South Coast Air Basin and would be inconsistent with the South Coast Air Quality Management District's Air Quality Management Plan.

b. <u>Impact AIR-2</u>: 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 Air Quality Management District's threshold criteria.

c. <u>Impact AIR-3</u>: 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.

d. <u>Impact AIR-4</u>: Construction of the proposed project could expose sensitive receptors to substantial pollutant concentrations.[6] O3-26

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

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

g. <u>Impact CUL-1</u>: 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.

h. <u>Impact GHG-1</u>: 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.

[6] See discussion in Section 4 above.

i. Impact GHG-2: The proposed project, together with cumulative projects, would result in substantial GHG emissions impacts.

Implementation of the proposed Project would result in several environmental impacts. Under CEQA, an impact is considered significant and unavoidable if it would cause a substantial adverse change in the environment that cannot be feasibly mitigated to a less-than-significant level. Where a lead agency nonetheless approves such a project, it must adopt a Statement of Overriding Considerations explaining why the Project's benefits outweigh its significant impacts.[7] O3-26 CONT'D

In addition, the DEIR erroneously identifies the following impact as "Less than Significant" due to the failure to perform adequate biological reconnaissance surveys:

j. 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. O3-27

As discussed above, this conclusion is unsupported because the underlying biological reconnaissance surveys are incomplete. The DEIR must be revised following completion of protocol-level surveys conducted during appropriate seasonal periods.

The DEIR is further deficient because it fails to identify or adequately evaluate the following impact areas:

k. Hazards and Hazardous Materials. The DEIR does not adequately address the presence of hazardous materials identified in the Additional Phase II[8], nor does it provide mitigation for potential exposure or the redistribution of contaminants during demolition and construction. O3-28

l. Noise. The DEIR fails to identify potentially significant noise impacts associated with construction activities and does not evaluate cumulative noise impacts from other concurrent projects within the City. O3-29

m. Transportation: Although the DEIR analyzes certain policy conflicts, it fails to evaluate significant impacts associated with modifications to the Fair Drive/Harbor Boulevard O3-30

[7] See CEQA Guidelines Section 15093[b].
[8] See discussion in Section 6 above.

intersection related to the State's Emergency Operations Center project. It also does not analyze how traffic circulation would be affected during emergency operations, when ingress and egress to the facility would be prioritized. Additional analysis and mitigation measures beyond Mitigation Measure T-1 are required.[9]

O3-30 CONT'D

n. Population and Housing. The DEIR acknowledges recent population declines in Costa Mesa and Orange County alongside increases in housing supply[10], yet concludes that adding up to 4,000 new housing units (approximately 9,926 residents) would result in less-than-significant impacts. This conclusion suggests either that the Project size could be reduced while still meeting RHNA obligations, or that the DEIR has failed to adequately analyze population and housing impacts.

O3-31

o. Recreation. The DEIR incorrectly concludes that impacts to recreational resources would be less than significant. It states that the Project would meet the City's standard of 4.26 acres of parkland per 1,000 residents; however, the Project would result in a deficit exceeding 28 acres. This shortfall necessarily imposes increased demand on existing City recreational facilities, constituting a significant and unavoidable impact. The DEIR must be revised to acknowledge this deficiency and identify appropriate mitigation measures.

O3-32

p. Tribal Cultural Resources. The DEIR concludes that impacts would be less than significant despite requiring extensive mitigation measures. This conclusion is inconsistent with the City's own findings in the "Neighborhoods Where We All Belong"/Housing Element draft environmental impact report, where similar impacts were determined to be significant and unavoidable. We note that the description of the mitigation measure in the DEIR goes on for pages. It is difficult to understand how something that requires such an extensive mitigation measure can be less than significant, and be recognized as significant in a related environmental report. The DEIR must reconcile this inconsistency and, if necessary, revise its impact conclusions.

O3-33

In light of these deficiencies, the DEIR does not provide an adequate or legally defensible evaluation of the Project's environmental impacts. The document must be revised to correct these omissions, incorporate updated data and analysis, and identify enforceable mitigation measures prior to Project approval.

O3-34

[9] See Pages 3.15-34 and 3.15-35, Section 3.15 of DEIR.

[10] See Page 3.12-6 of Section 3.12 of DEIR.

8. <u>Alternative analysis fails to consider a previously identified feasible alternative</u>.

The City has erred in identifying the proposed Project as the only feasible environmentally superior alternative. CEQA requires an EIR to evaluate a reasonable range of alternatives that would feasibly attain most of the project's basic objectives while avoiding or substantially lessening one or more significant environmental impacts. O3-35

CEQA Guidelines Section 15126.6(a) provides that an EIR must "describe a range of reasonable alternatives to the project, or to 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 must "evaluate the comparative merits of the alternatives." CEQA Guidelines Section 15126.6(f) further provides that the range of alternatives is governed by the "rule of reason," meaning the EIR must include those alternatives necessary to permit a reasoned choice. The alternatives analyzed in detail must be capable of feasibly attaining most of the project's basic objectives while reducing significant environmental impacts. O3-36

California courts have repeatedly held that an EIR must provide decisionmakers and the public with a meaningful range of alternatives. The alternatives analysis is a core component of CEQA because it allows the public and decisionmakers to evaluate whether the project's significant environmental impacts can be reduced through a different development program. (*Laurel Heights Improvement Assn.*, supra, 47 Cal.3d 376, 400–403.) An EIR that fails to consider a reasonable alternative capable of reducing significant impacts does not satisfy CEQA's informational purpose. (*Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087–1089.)

Here, the DEIR's alternatives analysis does not satisfy the rule of reason. The alternatives selected for analysis do not permit a reasoned choice because they do not include the previously identified 3,800-unit alternative, which had already been proposed by the City and subjected to financial analysis. That alternative is directly relevant because it appears capable of achieving most of the Project's basic objectives—mixed-income housing, affordable housing, commercial uses, infrastructure, and open space—while potentially reducing one or more of the Project's significant and unavoidable impacts, including impacts related to air quality, greenhouse gas emissions, traffic, recreation, and construction-related effects. O3-37

The exclusion of the 3,800-unit alternative is particularly problematic because the alternatives included in the DEIR were not subject to comparable financial feasibility review. The City previously identified and analyzed a 3,800-unit development scenario, therefore the DEIR must O3-38

explain why that alternative was not carried forward for detailed analysis. Without that explanation, the DEIR improperly omits a facially reasonable and potentially feasible alternative from public review. O3-38 CONT'D

The DEIR also fails to evaluate another obvious reasonable alternative: a reduced-density alternative below 3,800 units. Such an alternative could lessen significant environmental impacts while still providing substantial housing, including affordable housing, and contributing toward the City's RHNA and Housing Element goals. A reduced-density alternative could also help address the Project's open space deficiency, reduce construction and operational emissions, lessen traffic and infrastructure demand, and better align development intensity with the surrounding community. O3-39

Instead, the DEIR evaluates alternatives that either have not been meaningfully vetted in prior public planning discussions or do not provide the public with a useful comparison to the proposed Project. Other than the required No Project Alternative, the alternatives analyzed do not appear to reflect the most relevant and feasible options available to the City. As a result, the DEIR fails to provide the public and decisionmakers with the information necessary to make a reasoned choice among alternatives.

The DEIR must therefore be revised to include, at minimum, the following alternatives: O3-40

a. The previously identified 3,800-unit alternative, which was previously proposed and financially analyzed; and

b. A reduced-density alternative below 3,800 units, designed to lessen significant environmental impacts while still meeting most of the Project's basic objectives.

Once these alternatives are analyzed, the DEIR must be recirculated for public review and comment. Without analysis of these reasonable and potentially feasible alternatives, the DEIR does not comply with CEQA's alternatives requirements and fails to provide the informed decision-making and public disclosure that CEQA requires.

9. <u>Public Engagement has been inadequate and does not satisfy CEQA's public disclosure and participation requirements</u>.

Public engagement for a project of this magnitude has been inadequate. CEQA is not merely a technical reporting statute; it is intended to ensure that environmental consequences are disclosed to, and meaningfully considered by, both decisionmakers and the public before a O3-41

project is approved. The CEQA Guidelines expressly recognize that one of CEQA's basic purposes is to "[i]nform governmental decision makers and the public about the potential, significant environmental effects of proposed activities" and to "[e]nsure that environmental damage is avoided or minimized through feasible mitigation measures or alternatives." (CEQA Guidelines, Section 15002(a)(1), (2).) The Guidelines further emphasize that public participation is an essential part of the CEQA process. (CEQA Guidelines, Section 15003(b), (e).)

O3-41 CONT'D

California courts have repeatedly confirmed that meaningful public disclosure and participation are central to CEQA. As the California Supreme Court explained, an EIR is "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." (*County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.) An EIR also serves as "an informational document" intended to ensure that "the public and public agencies are informed" of a project's significant environmental effects. (*Laurel Heights Improvement Assn.*, supra, 47 Cal.3d 376, 391–392.) Where the public is not provided a fair and meaningful opportunity to understand and comment on a project's impacts, CEQA's core purpose is undermined.

Here, meaningful public engagement has been lacking. It was only recently that more than a limited number of Costa Mesa residents became aware of the Project, largely in response to the City's proposal to construct a secondary access road across several fairways of the municipal golf course. That proposal prompted significant community concern and resulted in one of the most well-attended outreach meetings for the Project, held at the golf course itself. The fact that public awareness substantially increased only after residents learned of a direct impact to the golf course demonstrates that earlier outreach efforts were insufficient to inform the broader community about the Project's scope, consequences, and long-term implications.

O3-42

By contrast, the kickoff meeting for the Notice of Preparation was sparsely attended. The meeting was held on a Monday evening in mid-November, approximately two weeks after the Notice of Preparation was submitted to the State Clearinghouse. It was held at the rear of City Hall shortly before Thanksgiving week, when many residents were traveling or preparing for the holiday. The deadline for submission of scoping comments followed shortly after Thanksgiving, leaving residents and interested parties with only a narrow and practically difficult window to review the materials, understand the Project, and provide meaningful input regarding the scope of the environmental analysis.

O3-43

This process falls short of CEQA's public participation objectives. CEQA requires more than nominal notice; it requires disclosure that enables informed public review and meaningful

O3-44

comment. Courts have made clear that an EIR must contain sufficient information and analysis to permit informed public participation and decision-making. (*Berkeley Keep Jets Over the Bay Com. v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1355–1356 [EIR must provide sufficient detail to enable those who did not participate in its preparation to understand and consider the environmental issues].) When outreach is minimal, poorly timed, or disconnected from the scale of the decision being made, the public cannot meaningfully participate in the environmental review process.

This Project deserves a far more robust public process. Together with the proposed rezoning under Measure K and the Housing Element update, the Project would substantially reshape Costa Mesa's population, circulation patterns, infrastructure demands, open space needs, and overall community character. These changes are not minor or isolated. They would affect the long-term livability of the City and would alter the heart of Costa Mesa in a manner unlike any prior project. A project of this scale should have included a formal advisory committee or other meaningful mechanism for sustained community involvement. Instead, the City proceeded without a transparent, structured process capable of incorporating public input into the Project's design, alternatives, mitigation measures, and community benefits.

O3-44 CONT'D

The absence of meaningful public input is reflected in the DEIR itself. The document does not adequately incorporate community priorities repeatedly raised during outreach discussions. Notably absent are community benefits such as an arts and cultural center, community gardens, a transit center with meaningful access to public transportation, affordable childcare, and other amenities that would contribute to a complete, balanced, and environmentally sustainable community. Instead, the DEIR appears oriented toward facilitating a master development program, without adequately responding to the public's stated vision for the site.

O3-45

Most troubling is the failure to provide adequate open space. For years, residents have consistently advocated for sufficient parkland on the Fairview Developmental Center site. Yet the Project proposes open space that does not satisfy the City's General Plan standard of 4.26 acres per 1,000 residents. Rather than meeting this standard on-site, the City appears to rely on park in-lieu fees without identifying the land that would be acquired, where it would be located, whether it would serve the Project's residents, or when it would be available. That approach is speculative and inadequate. CEQA requires that mitigation be specific, enforceable, and supported by substantial evidence; it does not allow the City to rely on vague future possibilities as a substitute for meaningful environmental analysis and mitigation. (See *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93 [mitigation measures must be fully enforceable and cannot be deferred without performance standards].)

O3-46

The City's approach also undermines CEQA's requirement that alternatives and mitigation be evaluated in a manner that allows meaningful public review. The public cannot evaluate whether in-lieu fees are adequate mitigation if the DEIR does not identify where replacement parkland would be located, whether suitable land is available, how much it would cost, or whether it would actually offset the Project's recreational impacts. At a minimum, the Project should provide enough on-site parkland to meet the General Plan standard. If the City proposes any alternative approach, the DEIR must disclose and analyze that approach in detail before Project approval.

O3-46 CONT'D

Finally, the most important planning question remains unanswered: How does this Project advance Costa Mesa's long-term vision? The DEIR does not meaningfully explain how redevelopment of the Fairview Developmental Center fits within the City's plans for the next 20 to 40 years, how it integrates with Citywide infrastructure and open space needs, or how it reflects the community's priorities. Redevelopment of this site is a once-in-a-generation opportunity. Yet the City cannot assemble a coherent long-term vision when essential pieces—meaningful public input, complete environmental review, financial analysis, infrastructure planning, enforceable mitigation, and a clear community benefits framework—remain missing.

O3-47

For these reasons, the City should not proceed with certification of the DEIR or approval of the Project until it has conducted a more robust public engagement process, revised the DEIR to reflect and respond to community input, and recirculated the environmental analysis for meaningful public review. Anything less would fail to satisfy CEQA's fundamental purpose of informed decision-making and meaningful public participation.

10. <u>Conclusion.</u>

For all of the reasons set forth above, the DEIR is inadequate and fails to satisfy CEQA's fundamental requirements of full disclosure, informed decision-making, and meaningful public participation. The document relies on incomplete and outdated data, omits critical analyses, improperly defers mitigation, and fails to evaluate a reasonable range of feasible alternatives. As a result, it does not provide the public or decisionmakers with the information necessary to understand the Project's true environmental consequences or to weigh those impacts against potential benefits.

O3-48

In addition, the Project as currently proposed is inconsistent with applicable state housing laws, undermines key General Plan standards—particularly with respect to open space—and fails to reflect longstanding community priorities. The lack of meaningful public engagement further

compounds these deficiencies and calls into question the integrity of the environmental review process.

Accordingly, the City must not certify the DEIR or approve the Project in its current form. Instead, the City should revise and recirculate the DEIR to address the deficiencies identified in these comments, including:

- preparation of updated technical studies and environmental analyses;
- identification and adoption of enforceable mitigation measures prior to approval;
- inclusion and evaluation of a reasonable range of feasible alternatives, including the previously identified 3,800-unit alternative and a reduced-density alternative; and
- implementation of a robust and transparent public engagement process.

O3-48
CONT'D

Only after these steps are completed can the City ensure compliance with CEQA and make a fully informed, legally defensible decision regarding the future of the Fairview Developmental Center site.

This Project represents a once-in-a-generation opportunity to shape the future of Costa Mesa. It is essential that the City proceed carefully, transparently, and in full compliance with the law to ensure that the outcome reflects both sound planning principles and the long-term interests of the community.

Thank you for your attention. Please feel free to contact us should you have any questions. O3-48 CONT'D

Very truly yours,



Richard J. Huffman Treasurer



Cynthia McDonald Assistant Treasurer

cc: Mayor, City Council, Planning Commission, City Manager, Director of Economic and Development Services

Costa Mesa First's mission is to educate Costa Mesans about planning policies in Costa Mesa so they make knowledgeable choices when voting. We encourage residents to choose walkable, bikeable, and inclusive neighborhoods, and the land use and transportation policies and investments needed to make Costa Mesa flourish. Our primary objective is to require Costa Mesa's leaders to put the residents of Costa Mesa first.

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RECEIVED

MAY 18 2026

Joseph DeCarlo

[redacted]

City of Costa Mesa

77 Fair Drive

Costa Mesa CA, 92626

Re: Farview Development Center Specific Plan Community Input

The present Fairview Development Center was an ideal site for developmentally disabled, homeless and drug addiction consumers. It's 100 acres can handle medical, provide care for these individuals vs. emergency room centers at much less cost. If some homeless want to camp out on the grounds, they can if they do not block sidewalks or disturb businesses. These dorms are already in place so they can provide immediate housing. They provide arts & crafts workshops, food services and medical assistance, all available on site. Why not utilize these existing resources for them rather than bulldoze down the existing structures. We can help more people who need it, reopening Fairview Development Centers than demolishing it.

I1-1

Joseph DeCarlo

[redacted]

Development Data on Fair View Development Center

by Bob Schureman

Two years ago I presented some of these concepts to a special group at the Center but I was told that in 2026 they would build Housing on a big part of this facility. That's not all bad but the possibility of part of this Center could be so useful to the four Needy groups of people in our area. I2-1

This is a great opportunity for the Development Center and could be a pace seter for the State. I am not looking for a job or on any ego trip but I would be more then happy to assist any one that could promote the Development Center .

MOTIVATION THROUGH TECHNOLOGY
MTT CO.

Promoting Research Design and Development
Bob Schureman

[redacted]

Robert Schureman
Assistant Professor, Industrial Design
Humanities and Sciences

[redacted]

RETIRED – 2025
ArtCenter

I- PROJECT HOPE

5 special programs

People: Homeless People, People that finished Rehab programs, Battered women and Children , Divorced women with no employment skills, Poor College and University students, some senior citizens that need employment

Objectives: Partial Employment (With benefits) , Required to take College or ROP Career Classes ,Low cost housing, Some on site or business employment work , On site Child Carer for Schooling and working mothers and fathers.

I2-1

Factors: On site housing but need to pay $ 100.00 per month and Be signed in a College or ROP Class for promoting employable work skills.

School Facilities (On Site): 1/3 of that school is devoted to Child Care , 1/3 is devoted to Business Computer training and 1/3 is devoted to Manufacturing Technology> Computer Intergrated Manufacturing , Ref. CNC Milling,3-D Modeling , Laser Technology and Robots.

2/3 of these technologies are Intro systems but relate to possible further education places.

Being a paid person provides Insurance but most important Social Security future benefits >Helping to take care of their future (some what).

Schools , Colleges and Universities offer part time jobs and there are so many great Businesses and Industry that would help and for sure lots of jobs at The Center.

Additional Section: Research Design and Development.

Networking with Colleges and Universities

I2-1

Career Development Center

Program ~~at FairView Development Center~~

I2-1

Introduction for Career training with emphasis on Computer Technology. Promoting skills for people with special needs.

I Organize contacts with Businesses and Industry for potential jobs

II Partial Training ~~at FairView~~

III Operation Bridge Over with Colleges and Universities

IV Work with Research Design and Development Program ~~at FairView~~

V Develop funding from Business and Industry

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* Still at Fair View Facility

SKILL CENTER

Objective: **To provide Employable Skills for Needy People**

People : Homeless Battered Women Divorced Women Women who were incarcerated and have no Employable Skills People with Special Needs

Support: State City Industry Federal

Note the state has a 3.4 million fund for such development

Assessment: Evaluate /Written data on those that might apply
Seek Temporary Employment
Performance evaluation Seek Housing
Time Factor

Note: Referring to the Homeless About 30 % are physically and mentally able to work unfortunately only about 10 to 15 % will take advantage of this Skill Center now 40 to 60 % are finished with alcohol and drug rehab and able to work and would appreciate the opportunity. Not sure how the mentally handy caped group can be helped here.

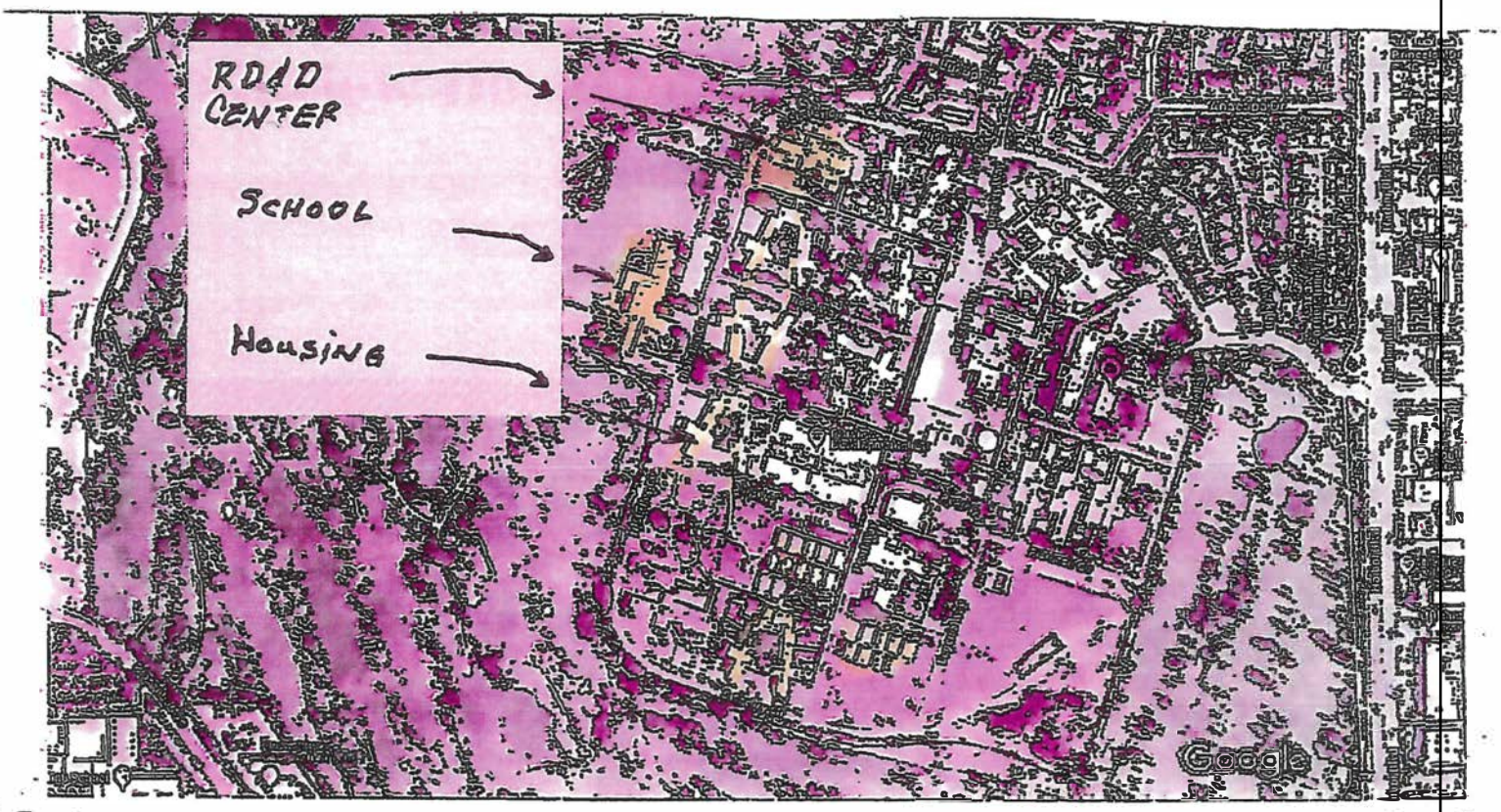
There are so many people who would be proud to assist in this endeavor.

Fairview Developmental Center

Use to be Fair View Mental Facility

114 Acres State Owned Property Listed at 50%full but that is a high figure as it is way under developed or occupied.

I2-1



Such a beautiful facility that could offer so much to Homeless and Special Needs People.

Great site for Bob's Project HOPE

Bob Schureman [redacted]

While I understand the importance of addressing housing needs, I have serious concerns about whether the current proposal adequately supports the long-term functionality, safety, and quality of life of the surrounding community. I3-1

One of my primary concerns is the limited parking allocation for nearly 1,000 residential units. Even with the inclusion of street parking, the number of vehicles generated by a project of this size will inevitably place substantial strain on surrounding neighborhoods and existing infrastructure. Overflow parking, increased congestion, and impacts to emergency access and traffic circulation are all issues that deserve closer evaluation before approval. I3-2

In addition, the traffic impacts associated with an estimated 8,000 new residents raise significant concerns for the surrounding roadways and freeway access points. Harbor Boulevard and Newport Boulevard already experience substantial congestion during peak commuting hours, and this development is likely to intensify existing bottlenecks throughout the area. Increased traffic volumes near freeway entrances and exits will further burden local circulation patterns and could create additional delays, safety concerns, and reduced accessibility for existing residents. With only limited access routes serving portions of the surrounding community, it is difficult to understand how infrastructure improvements currently proposed will adequately accommodate this level of growth. I3-3

I am also concerned that the project appears to allocate only approximately 14 acres of parkland despite the significant projected population increase. My understanding is that Costa Mesa's own parkland standards and planning goals generally require a higher ratio of recreational and open space to support developments of this scale. Existing parks and recreational facilities are already heavily utilized, and without adequate expansion, this project risks placing even greater pressure on community resources. I3-4

Additionally, I would appreciate clarification regarding the relatively small amount of commercial square footage proposed in relation to the anticipated population increase. (35,000 sq ft for commercial use is smaller than the new Target on 17th street) A development of this magnitude will generate increased demand for grocery stores, childcare, restaurants, retail services, and other daily-use amenities. The plan in place seems heavily flawed. I3-5

Given the scale of this proposal, I respectfully urge the City to carefully evaluate whether the current plan aligns with Costa Mesa's infrastructure capacity, traffic conditions, parkland requirements, and broader community planning objectives. I would also urge the city to focus less on high density housing/low income housing incentives and instead come up with an alternative plan for market rate housing minus low income housing. It would be incredibly refreshing to have a city commission team provide two options given you're seeking out community feedback. I3-6

Thank you for your time and consideration. I appreciate the work involved in reviewing projects of this complexity and hope these concerns will be seriously considered moving forward. I3-7

Wendy Leece
[redacted]

July 1, 2026

Via email to Melinda.Dacey@costamesaca.gov

My Comments on the Fairview Developmental Center DEIR

Realistic mitigation of the numerous environmental impacts on current residents, visitors and workers who commute to Costa Mesa is impossible.

With the proposed FDCSP development we will lose our Costa Mesa, the beautiful, diverse, eclectic city we love.

It is *very* unfortunate that the State is forcing the city to this moment of decision by requiring a densely populated "mini city" of 10,000 people on 95 acres with many environmental challenges in the center of an already built out and busy part of Costa Mesa.

"A square peg in a round hole" comes to mind. Nice project, plenty of needed housing, just the wrong place. Let's be realistic and fair to Costa Mesans, present and future.

I4-1

I call your attention to the list of mitigations necessary to build and bring this project to completion. Many are identified impacts that are "significant and unavoidable." Table ES-2

> Air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, transportation, tribal cultural resources.

I4-2

Four of you will be termed out in a few months. Do you want this project to be your legacy? Do you want people to curse you as they are stuck in traffic on Harbor or rerouted because of the congestion? During months of construction do you want our local businesses to lose customers?

I4-3

No Traffic Management Plan can deal with the anticipated traffic congestion on Harbor and Fair and other busy streets like Wilson, Victoria and Merrimac. I4-4

What ARE the benefits of this project to the current 110,000 Costa Mesa residents? I don't see any. Any benefits to Costa Mesans do not outweigh the above serious environmental impacts, especially the increased traffic surrounding the FDC and air quality. I4-5

Thankfully after all these many months, the moment of truth has arrived, and we can identify in the DEIR the many ***irreparable harms*** that will impact us and our daily lives.

Many of us sounded the alarm three years ago that this was a bad idea for Costa Mesa and we went to the FDC auditorium to speak up to State officials to oppose the EOC. We lost. Sadly.

Some of us attended the citizen meetings at the Senior Center, St. John the Baptist church, City Hall and the golf course and **spoke to consultants and city staff about our concerns about the project's negative effects on us**. Increased traffic congestion, poor air quality, adding public services like fire and police, increased noise, and loss of biological and cultural resources are still our main concerns. I4-6

Many of us hoped some of you would have negotiated with the State officials like DGS **not to put the EOC and this new dense residential/commercial community at the FDC.**

I recall years ago a nonpartisan citizen group stopped the sale of the OC Fair grounds which would have a huge negative impact on our quality of life. City council members met with the Governor and citizens sent hundreds of postcards opposing the sale. We, the citizens, won!

The State has usurped **our local** land use planning! The DEIR reveals that a very heavy burden will be placed on the city and its staff and resources to successfully oversee and complete mitigation to protect residents ofrom all the environmental effects. Other city projects will suffer with focus on the FDC. I4-7

Do you really want to go down this (dusty from construction debris) road?

Master planning may work well in the City of Irvine, but not in Costa Mesa. Our many unique neighborhoods represent our city's diversity where "all are welcome": Westside, (best side), Eastside, Mesa del Mar, Mesa Verde, Mesa North, Wimbledon, Greenbrook etc. I4-8

This project, because of the proposed density, is not compatible with the small-town ambience and geography of Costa Mesa.

But there is good news. The DEIR clearly **gives the City Council a way out by acknowledging that the project proposed in the DEIR could not go forward unless the General Plan and zoning codes are amended.** I4-9

You do not have to approve the FDCSP.

A reduced project scope would have less impact on Costa Mesans and would be a win for our city and comply with RHNA obligations.

See (ES.5.2) "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. I4-10

"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 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."**

I4-10
CONT'D

Even though I live 3.7 miles from FDC I have been actively speaking against this project for nearly three years because of the many impacts I and all Costa Mesans will experience if this project goes forward.

Here are more reasons to deny this project:

Please see "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.

1. Whether this EIR adequately describes the environmental impacts of the project. I don't think it does—there are many required studies necessary by qualified biologists who must write reports about the many impacts on critters such as bees, burrowing owls, bats, birds. Reports should be made available to the public before construction begins. I4-11

2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance. The benefits of about 10,000 residents housed on the project in 4,000 units do not outweigh the negative impacts to the current residents. The city should determine a lower number of units to meet the RHNA requirements. I4-12

3. Whether the proposed land use changes are compatible with the character of the existing area. No, the project is not compatible. Originally Shannon's Mountain was proposed which was compatible and single-family homes, condominiums, perhaps apartments near the golf course would be better. I4-13

4. Whether the identified goals, policies, or mitigation measures should be adopted or modified. This will take a lot of time with residents needing more information. I4-14

5. Whether there are other mitigation measures that should be applied to the project besides the mitigation measures identified in the EIR. There are pother mitigation issues mentioned in the Costa Mesa First letter. I4-15

6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve I4-16

most of the basic project objectives." There may be alternatives to be explored but the "significant and unavoidable" impacts are many and cannot be overcome. I4-16 CONT'D

And more reasons:

Please see "Areas of Controversy ES.7"

"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. I4-17

■ 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 about transportation and suggested an alternative access point.

■ The Santa Ana Regional Water Quality Control Board requested regulatory compliance with 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.

I4-17
CONT'D

■ 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. MAY 2026”

I4-17 CONT'D

In closing, I want to acknowledge the analysis and many concerns and conclusions listed in the 22-page letter from Costa Mesa First. I hope you take the letter seriously because their careful analysis speaks volumes on all the issues on behalf of your constituents who do not have the time to read, absorb and comment on the inch thick document.

I4-18

Please stand up for your Costa Mesans and restore our city’s local control of the development of these 95 acres. That’s why we elected you: to protect our city and its future even though the State owns the land. You have the power to do what is right for your constituents.

Vote NO on this project and pass the buck to the next City Council and **you will be remembered fondly and be blessed for your courage to protect our enviable and special quality of life here.**

I4-19

I support **no more** than 2,300 units, which is much more realistic for our city. I insist on robust town halls to include residents nearby and throughout our city so elected officials, not just consultants, can hear our ideas and concerns. I would hope this project might finally include the shelf ready-special housing project for the disabled--Shannon’s Mountain.

Sincerely,

Wendy Leece
Proud 54-year Costa Mesa Westside resident