



## CITY OF COSTA MESA

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DEVELOPMENT SERVICES DEPARTMENT

Date: April 17, 2023

State of California, Department of General Services  
707 Third Street  
West Sacramento, California 95605

**RE: Notice of Preparation (NOP) – Environmental Impact Report (EIR) for Southern Region Emergency Operations Center Project**

Dear Terry Ash,

Thank you for including the City of Costa Mesa in the environmental review process for the above referenced project. We appreciate the opportunity to work with the State of California Department of General Services on the proposed project and the coordinated planning efforts.

As noted in the NOP, the proposed project would develop another Emergency Operations Center (EOC) in Southern California that would mirror the operations of the Mather facility at a smaller scale and provide more effective State emergency support to local governments within the Southern Region. The project site will specifically encompass approximately 15 acres or less of the existing Fairview Development Center. The project component includes an approximately 35,000-square-foot, single-story office building that would contain office space, an EOC, and shared training rooms, as well as an approximately 20,000-square-foot support warehouse building that would contain a vehicle maintenance bay and space for life-sustaining commodities. The facility would also include a helipad and a 100-foot-tall lattice tower with 20-foot whip antennas on top. The proposed project would replace the temporary Regional EOC, which is currently operating approximately 11 miles northwest of the proposed project site in the City of Los Alamitos. The proposed project would also act as a backup State Operations Center for the Mather facility.

The proposed project is within the City of Costa Mesa boundary and is accessible from Harbor Boulevard from Fair Drive and Merrimac Way. The project site is surrounded by the Costa Mesa Country Club golf course, residential uses, and public facilities, including Estancia High School, the City's Corporation Yard and Fire Station 4 off of Placentia Avenue.

After the review of the NOP, the City of Costa Mesa has the following comments regarding the scope and content of the environmental documentation pursuant to the California Environmental Quality Act (CEQA):

**Comment 1****Project Description**

The details regarding the project scope in the NOP are very limited and presents a challenge for the City and community members to provide meaningful feedback regarding potential environmental concerns. The City requests that the project description in the EIR is clearly defined and includes the following information:

- For Transportation, Air Quality, Greenhouse Gas, and Noise Analysis, provide the expected trip generation for daily operations, during emergency events, and training events
- Expected number of training events per year and number of participants
- Project timeline for construction and operation
- Describe the day-to-day operation of the facility and how it will function during an emergency event; include number of employees projected onsite for each operational use type
- Include a site and elevation plan that shows the general layout of the proposed use
- Include information on vehicle maintenance and plans for proper disposal of any environmental hazards
- Identify the location of the proposed back-up generators
- Water Quality Management Plan and information on water retention basin
- Provide information regarding on-site and off-site improvements anticipated to support the facility, include roadways and intersection information, as applicable
- Clarify the proposed warehouse/storage use and provide a list of hazardous materials that may be stored onsite

For the permit process (responsible agency) discussion in the EIR, please discuss how land use compatibility will be determined in the future. Provide information regarding whether the helipad would require an Airport Land Use Plan of its own and describe how future land use entitlements will be processed and coordinated for areas within the helipad safety zones.

**Comment 2****Land Planning Coordination and Outreach**

The project site has a General Plan Land Use Designation of Multi-Use Center and is within Zoning District of Institutional & Recreational – Multi-Use District (IR-MLT). The Multi-Use Center designation is applicable only to the Fairview Developmental Center (FDC) in anticipation of its future closure. The Multi-Use Center designation refers to the integration of a variety of land uses and intensities. This land use category includes uses which are low to moderate intensity and urban in character. The allowable land uses pursuant to the General Plan and Zoning Code are as follows: 0.25 FAR Institutional and Recreational uses - 25 percent minimum requirement for park and open space purposes (approximately 25.6 acres), the

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Housing & Community Development 714.754.4870 • Planning Division 714.754.5245

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maximum cap of 582 dwelling units for the entire site within the limitations. The Multi-Use Center designation is comprised of a variety of residential, open space, and institutional uses. This maximum cap of dwelling units and theoretical build out of the FDC will change in the near future as discussed below.

The FDC was identified as a candidate site to accommodate a portion of the City's Regional Housing Needs Assessment (RHNA) allocation. Each of the candidate sites has a projected residential capacity to accommodate various income levels – as required by State housing laws and assigned through the RHNA process. The number of residential units that is projected for the FDC site is 2,300 units.

The City's adopted its 6<sup>th</sup> Cycle Housing Element in November 2022; the document and supporting appendices are available online at:

<https://www.costamesaca.gov/government/departments-and-divisions/economic-and-development-services/planning/housing-element-update>.

State and City partnership and coordination is vital to planning the future land use of this site. To assist in this process, Senate Bill (SB) 188 was approved by the State Assembly in June 2022, which authorized the State to enter into an agreement with the City of Costa Mesa for the City to develop a specific plan and other appropriate planning documents for the FDC property. As part of the City/State agreement executed in December 2022, the State provided \$3.5 million in funding to the City and the City will utilize the funds to process an amendment to the City's general plan and updates to any appropriate implementing planning documents conduct and complete environmental review pursuant to CEQA for a mixed-use development at the FDC site, including mixed-income housing. Pursuant to the Senate Bill, the development would include and prioritize affordable housing, including at least 200 units of permanent supportive housing, and open space. The City anticipates releasing a request for proposals for qualified consultants to assist in community outreach and the planning process in Spring 2023.

Given the City and State's mutual goals of housing at the FDC site, coordination between the City and the State is critical to ensuring that the proposed OES project does not unduly limit and in fact proactively facilitates a well-planned residential community at FDC. As such, the City requests ongoing coordination meetings with the State's team regarding land planning decisions. In addition, the City requests the State engage in outreach to the local community, including local townhall discussions for example, to share information and receive feedback throughout the site planning process.

### **Comment 3**

#### **Project Objectives**

The City requests that the project's objectives are clearly defined in the EIR to establish a range of reasonable alternatives to the project, or to the location of the project, that would avoid or substantially lessen any of the significant effects of the project. To ensure that the State's and City's planning and housing goals are met, consider including the following statement as one

of the project's objectives:

- 1) Develop a facility that considers and coordinates the reuse of the FDC site to achieve the long-range goals of the State and City, including facilitating housing and open space.
- 2) Develop a facility that will promote and facilitate multimodal active transportation.

#### **Comment 4**

#### **Reasonable Range of Alternatives**

Specific project alternatives should consider alternative project design that would relocate uses that would limit future residential uses at the FDC site. For example, the proposed helipad at the site poses a significant constraint to the potential development of housing due to its various landing and clearance zones. In addition, a helipad without proper planning, may pose an air safety hazard to existing residential neighborhoods in the area. As such, the City requests the State evaluate alternative off-site locations for the helipad including:

- John Wayne Airport which is located approximately 4 miles from FDC and has existing helipad infrastructure.
- State-owned Fairgrounds property which is located approximately 0.7-mile from the proposed project site and includes large unobstructed areas appropriate for helipad operations.
- Costa Mesa Police Department's Helipad is located approximately 0.8-mile from the proposed project site, or other municipal helipads located in close proximity.

In addition, other onsite locations for the helipad should also be considered which may limit the impact of the helipad to existing and future planned residential neighborhoods at FDC. For example, evaluate locating the helipad at the western edge of the property or the southeastern edge to minimize overlap of the air hazard clearance zones with residential uses. Consider whether a land swap with the City would facilitate better land planning solutions at the FDC site for both the State and the City.

Additionally, the City requests the EIR evaluate alternatives to the proposed 120-foot tall communication tower. Such an installation poses significant visual impacts to the surrounding residential community. At minimum, the City requests an alternative for a reduced height, alternative off-site location, or on-site location away from residential communities, and/or design options that utilize effective visual screening techniques, further described below.

Lastly, the City requests the State consider alternative routes for vehicle access and utilities that avoid disruption to the golf course and other operationally critical City facilities and infrastructure such as its Corporation Yard and Fire Stations.

**Comment 5****Aesthetics**

The proposed facility will include a 100-foot-tall lattice microwave communication tower with 20-foot whip antennas on top. The proposed structure far exceeds the height limitation that are typically permitted in the City. In order to fully disclose and mitigate the potential aesthetics impacts to the surrounding recreational open-space and residential neighborhood, analysis should include a photographic simulation of the tower from multiple viewpoints. The photographic simulation should also include any security fencing that may be installed around the project parameter.

The City highly encourages incorporating the following design features to minimize the visual impacts:

- 8' block wall enclosure for the communication tower
- Screen security enclosures with vines, shrubs and trees (photographic simulation should show how landscaping will appear at planting and matured after three to five years)
- Refer to the City's Zoning Code - Landscape provisions; as well as the City's Streetscape and Median Development Standards for future road improvements
- Anticipate future residential/urban uses, provide a landscape buffer between the proposed facility and existing/future urban land uses
- Light fixtures shall be shielded to avoid spillover onto adjacent properties; analysis should include a photometric plan
- Consider, alternative design such as disguised tower, self-rising emergency towers or different location for the communication tower

**Comment 6****Land Use/Planning**

The EIR analysis should consider how the proposed project would change or affect the General Plan document, including its adopted 6<sup>th</sup> Cycle Housing Element, and affect the anticipated future build out of the General Plan relative to the environmental issues. The proposed project includes a helipad for use during emergency events. The land use compatibility analysis should consider, in particular, land restrictions and measures to minimize the public's exposure to excessive noise and safety hazards, as well as identifying compatible and incompatible land uses within the helipad safety zone.

**Comment 7****Transportation/Traffic**

Impact analysis shall include both Vehicle Miles Travel (VMT) Analysis and Level of Service (LOS) Analysis, and include potential mitigation, as applicable. Consistent with current State

law, Costa Mesa continues to use LOS as the performance metric for land use and circulation planning, although the City supports policies that would reduce VMTs primarily through the implementation of a transportation demand management and the active transportation and transit strategies.

The City requests that the Transportation/Traffic Impact Analysis include LOS analysis to ensure that improvements to the circulation systems are in place to accommodate the proposed project.

Prior to initiating the Transportation/Traffic Impact Analysis (TIA), work with City Transportation staff to define the scope of the TIA.

- The traffic study area needs to include at a minimum all signalized intersections with project peak hour trips of 50 or more peak hour trips (including both trips to and from the proposed project). In addition, project study area intersections need to include, but not limited to: Harbor/Baker, Harbor/Adams, Harbor/Mesa Verde Drive East, Harbor/Merrimac, Harbor/Fair, and Harbor/Wilson.
- Active Transportation shall be considered for the site including a review of pedestrian and bicycle access and circulation, as well as amenities provided on-site to accommodate bicyclists and pedestrians. The analysis should provide recommendations on improvements for active transportation and on/off-site circulation (reference materials – City of Costa Mesa’s Active Transportation Plan/Active Orange County’s Bike and Pedestrian Plan)
- A discussion of on/off-site circulation shall be included in this section complete with descriptions of the proposed access points, line of sight at driveways, turn prohibitions, number of lanes proposed, proposed bus stop locations, deceleration or acceleration lanes provided, turn pocket requirements, vehicle storage length requirements, and circulation, and any other applicable circulation issues.

The proposed project’s main access from Harbor Boulevard is through Merrimac Way and Fair Drive. City of Costa Mesa General Plan Circulation Elements classifies Harbor Boulevard as a Major Arterial and Merrimac Way and Fair Drive as Primary Arterials. Provide cross-section of the proposed roadways that connects to the main access roads to the site. Incorporate bike lanes and multi-use pathways in the road design.

### **Comment 8**

#### **Noise**

The project proposes to include a helipad that would be utilized during an emergency event – though infrequent – will create a new source of noise that above the existing ambient level. The project-specific noise impact analysis shall consider aircraft noise impacts to the existing and future residents, employees and visitors. Noise analysis shall consider noise generated during

an emergency events, such as backup generator, increase of traffic and media presence, and noise generated by outdoor training events.

**Comment 9**

**Hazardous Materials and Safety**

The proposed project site is located near existing and future residential development; as such disclose any potential hazards or hazardous materials stored on site and address safety concerns.

The City has an approved Local Hazardous Mitigation Plan (LHMP) that allows the City to better plan for future emergencies. It provides strategies to reduce instances of property damage, injury, and loss of life from disasters. The LHMP includes an assessment of the natural and human-caused hazards and provides policy recommendations to help reduce the community's threat from hazard events. Include in the analysis whether the operations of the proposed project pose any hazardous event (including potential aircraft incident) and provide mitigation to reduce its potential impacts. Include a discussion on coordinating efforts with local police, fire stations, hospitals, and roads during emergency events.

**Comment 10**

**Cultural/Tribal Cultural Resources**

The proposed project may require grading of the property. Cultural and Tribal Cultural Resources may be unearthed during the grading process. Therefore, the City requests a Cultural Resources Assessment and include archaeological records search. Any potential impacts to Cultural/Tribal Cultural Resources should be avoided or mitigated.

**Comment 11**

**Historic Resources**

As noted in the NOP, the site is considered a historical district known as the "Fairview State Hospital District." The proposed project will require demolition of the existing facilities. Analyze potential impacts to the historical district and provide mitigation as appropriate.

**Comment 12**

**Air Quality**

Include Air Quality analysis the impacts associated with construction and operation of the proposed project, provide mitigation as appropriate. Address fugitive dust during grading and construction activities and provide an analysis that determines if the project is consistent with the regional Air Quality Management Plan. Determine and disclose if the project has potential to expose sensitive receptors, which are located within one mile of the project site, to

substantial pollutant concentration. The project site is within a mile sensitive receptor including residences, schools, playgrounds, and athletic facilities.

### **Comment 13**

#### **Greenhouse Gas (GHG)**

The City does not have a local Climate Action Plan that addresses greenhouse gas emissions. The GHG analysis should address the potential of the project to affect global climate change. The analysis shall address short term construction and long-term operational emissions of the principal GHGs. The emissions should be quantified and their significance relative to the South Coast Air Quality Management District GHG tiered thresholds is discussed.

### **Comment 14**

#### **Recreational and Public Service**

Refer to the City General Plan Open Space and Recreational Element adopted in 2016: <https://www.costamesaca.gov/home/showpublisheddocument/34706/636740022584770000>. The Open Space and Recreational Element provides a discussion on existing park level of service. There is very limited land available for new parkland within the City's boundary. As such it is important to ensure that park facilities that are located near the project site and surrounding areas are not impacted. Specifically, the Costa Mesa Golf Course is owned by the City and managed by a private operator and the City currently leases approximately five (5) acres of the Fairview Development Center for youth recreational activities.

The Public Service and Recreational analysis of the EIR should analyze, disclose and if appropriate, mitigate any potential impacts to these park sites and other surrounding park sites. Analyze whether the access routes to the project site or other project components impacts to the City's ability to provide fire and police protection within the Public Service Section of the EIR.

### **Comment 15**

#### **Utilities**

The Project EIR should analyze on-site and off-site improvements to extend and/or expand utilities and service systems, and provide mitigation as appropriate.

### **Comment 16**

#### **Cumulative Impacts**


A list of projects that are in process within the City of Costa Mesa will be provided in a separate communication. The project list includes the initiation of the FDC Specific Plan, community planning efforts to revitalize key commercial and industrial corridors, and Housing Element



implementation. Cumulative impact analysis should address the buildout of the FDC pursuant to the City of Costa Mesa Housing Element and the Agreement with the State. The forthcoming FDC Specific Plan will provide guidance for future mixed-use residential/commercial development, including 2,300 residential units for varying income level households. The development of the Southern Region Emergency Operations Center should be coordinated with the development of the FDC Specific Plan.

The City looks forward to receiving the draft EIR once the document is available for review. If you have any questions, please contact Phayvanh Nanthavongdouangsy, Principal Planner at 714-754-5611 or at [phayvanh@costamesaca.gov](mailto:phayvanh@costamesaca.gov).

Sincerely,



Jennifer Le  
Director of Economic and Development Services  
City of Costa Mesa

CC:

Lori Ann Farrell Harrison, City Manager, City of Costa Mesa  
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