

# COSTA MESA



April 15, 2026

VIA EMAIL ONLY– [FDCHousingPlan@costamesaca.gov](mailto:FDCHousingPlan@costamesaca.gov)

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

Re: Draft Fairview Developmental Center Specific Plan

Dear Ms. Dacey:

Thank you for the opportunity to provide comments on the draft **Fairview Developmental Center Specific Plan** (“FDCSP” or “Project”) prepared by the City of Costa Mesa (“City”).

The Project is proposed for the Fairview Developmental Center (“FDC”) site in Costa Mesa, California. It would encompass approximately 95 acres of the remaining 110-acre FDC property and would allow for development of a mixed-use community. At buildout, the Project would include a minimum of 2,300 dwelling units, with the potential to accommodate up to 4,000 dwelling units, along with up to 35,000 square feet of commercial space.

The FDC site is currently zoned **Multi-Use Center**, which allows low- to moderate-intensity urban uses with residential densities ranging from six to 40 dwelling units per acre (“du/ac”) and a maximum floor area ratio (“FAR”) of 0.25 for nonresidential development. A smaller portion of the site is designated **Medium Density Residential**, allowing up to 12 du/ac. Under the City’s General Plan, the site is required to provide a minimum of 25 acres of open space and currently allows for up to 582 dwelling units. The eastern portion of the site is zoned **Planned Development Residential – High Density**, permitting residential development at densities of 20 du/ac or greater. Existing uses on the site include institutional

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

buildings, associated infrastructure, and recreational facilities, all developed at an FAR of approximately 0.25.

As proposed, the Project building heights could reach up to 12 stories, including parking structures. FDCSP is intended to provide a wide range of housing types to accommodate households across income levels and life stages, including two- and three-story townhomes, courtyard-style units, and multi-family apartment buildings of varying heights. In doing so, the Project would address a substantial portion of the City's **Regional Housing Needs Allocation** ("RHNA").

The proposed housing program includes the following minimum unit allocations:

- **Very Low Income:** 575 units, including 200 units of Permanent Supportive Housing, consistent with California Government Code Section 14670.311;
- **Low Income:** 345 units;
- **Moderate Income:** 690 units; and
- **Above Moderate Income:** 690 units.

The total of the minimum unit allocations is 2,300 units.

In addition, the Project would provide independent and assisted-living senior housing options.

Up to 35,000 square feet of commercial space could be developed either as standalone buildings or integrated within mixed-use structures. Permitted uses would include retail and food-serving establishments—such as restaurants, cafés, small-format grocery stores, and pharmacies—as well as fitness studios, medical and professional offices, childcare facilities, and other community-serving uses.

The Project would include a minimum of 14 acres of publicly accessible open space, consisting of parks, plazas, walking and cycling trails, recreation facilities, and cultural amenities. This public open space would be provided in addition to the private and common open space required for residential development.

Primary site access would be provided by:

1. The existing Fair Drive access point on the northeast portion of the site; and
2. A proposed new public street connection at Harbor Boulevard along the southeast boundary of the site.

Emergency-only access would be provided via Merrimac Way, a State-controlled and maintained roadway. This access point would remain gated when not in use.

The proposed Harbor Boulevard access would traverse a portion of the adjacent municipal golf course, requiring reconfiguration of up to six golf holes. The Project also includes construction of the **Shelley Circle Trail**, a multiuse pedestrian and bicycle path approximately 4,650 linear feet in length. The trail would be constructed as an 8- to 10-foot-wide, two-way facility extending along the eastern edge of the Project site adjacent to the golf course and connecting northeast to the existing Tanager bicycle trail.

Nearby amenities include the municipal golf course and **Fairview Park**, a nature preserve containing environmentally sensitive species and habitats located approximately 1,800 feet from the Project site. An existing affordable housing neighborhood is located approximately 600 feet from the Project site.

The FDC property is owned by the State of California (“State”), which controls the disposition process and will lease, sell, or donate the land to a master developer (“Master Developer”) selected by the State.

The Project site is adjacent to the State’s **Emergency Operations Center**, currently under construction on approximately 15 acres of the FDC property. This facility will include a 35,000-square-foot office building, a 20,000-square-foot warehouse, and a 120-foot communications tower and is anticipated to be completed by the end of 2027. The Emergency Operations Center is not part of the FDCSP.

The State will retain ownership and control of an approximately 20-acre portion of the FDC site reserved for housing for individuals with developmental disabilities. Development of that housing will be the responsibility of the State and is separate from the FDCSP.

We submit the following comments regarding the FDCSP document for the City’s consideration:

1. **General Comments.** Although we understand that the FDCSP is a draft document, it contains numerous spelling, grammatical, and typographical errors, as well as instances of improper word usage. For example, in the Acknowledgements section at the beginning of the document, the names of Councilmember Jeff Pettis and Planning Commissioner Jeffrey Harlan are misspelled. The document should be thoroughly proofread and corrected prior to issuance of the next draft.

As this document constitutes both a planning document and a legal document, reliance on passive voice should be minimized to avoid ambiguity and the potential misinterpretation of its provisions.

Additionally, the FDCSP lacks critical substantive information, including the specific number of dwelling units proposed or permitted. The document also does not include, or adequately reference, essential technical studies and analyses—such as the Environmental Impact Report (“EIR”), including traffic analysis, and comprehensive fiscal analysis—that may result in substantial revisions to the Project description and development standards. In the absence of this information, it is not possible to meaningfully evaluate the FDCSP or fully assess the potential impacts of the Project.

For these reasons, we expressly reserve the right to review and provide additional comments on future revisions of the FDCSP and on any associated environmental or technical documents as they become available.

2. **Statutory Compliance.** Section 65451(a) of the California Government Code specifies the required contents of a specific plan. Subsection (2) mandates that a specific plan include text and diagrams that specify, in detail:

“(2) The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, **energy**, and **other essential facilities** proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.” (Emphasis added)

The FDCSP does not include any meaningful discussion of the need for additional energy infrastructure or other essential facilities proposed to be located within the Specific Plan area. As written, the document fails to identify how energy or other essential services will be provided to support the scale and intensity of development contemplated by the Project, as required by Government Code Section 65451(a)(2).

Subsection (4) of the same Government Code Section states that a specific plan shall provide:

“(4) A program of implementation measures including regulations, programs, **public works projects, and financing measures necessary to carry out paragraphs (1), (2), and (3).**” (Emphasis added)

The FDCSP does not provide the implementation measures required for the public works projects contemplated by the Plan. Most notably, it fails to identify or analyze the financing measures necessary to fund required infrastructure and public facilities. For example, Section 7.2.4 of the FDCSP states that new police and fire department substations will be required, yet provides no information regarding the anticipated costs of those facilities, funding mechanisms, or whether responsibility for financing will rest with the City, the State, a Master Developer, or future residents.

The FDCSP should be revised to comply with California Government Code Section 65451 by clearly identifying:

- (i) the plan for providing energy and other essential facilities;
- (ii) the implementation measures for all public works projects; and
- (iii) the anticipated financing mechanisms necessary to carry out those projects. Providing this information is essential to ensure transparency and allow the public to meaningfully evaluate the feasibility and impacts of the Project.

In addition, Appendix D, titled “**General Plan Consistency**,” merely lists existing General Plan policies and does not provide a substantive analysis of the relationship between the FDCSP and the General Plan. It fails to demonstrate internal consistency, compare goals, objectives, and policies, or explain how the FDCSP implements the General Plan. This information is necessary to evaluate whether the FDCSP complies with California Government Code Section 65454. Appendix D should therefore be revised to include a detailed discussion of consistency and implementation.

3. **Structure of Document**. Throughout the FDCSP, there are numerous instances of text and imagery that appear unnecessary, redundant, or unrelated to the purpose of a specific plan. Significant portions of the text repeat information provided elsewhere, are overly verbose, or provide background material that does not meaningfully inform the reader or aid in evaluating the Project.

For example, Chapter 1, “History and Disposition Process,” devotes substantial space to a detailed history of the site and the Lanterman Developmental Disabilities and Services Act (“Lanterman Act”). Much of this information could be significantly condensed or eliminated entirely without impairing the reader’s understanding of the Project. Similarly, the inclusion of numerous historic photographs appears unnecessary, particularly given that none of the existing buildings will be preserved and the historic use of the site will no longer be relevant once redevelopment occurs.

In addition, each chapter contains a separate “Purpose” section that largely repeats information presented in the Executive Summary or restates what is otherwise evident from the chapter’s content. These sections are duplicative and could be eliminated to streamline the document. Readers can readily discern the purpose of each chapter by reviewing the Executive Summary or the chapter itself.

The document would also benefit from improved formatting and navigability. Cross-references, including appendices and internal citations, should be clearly identified, underscored, or hyperlinked, and bookmarked to facilitate ease of use.

All references to legislation should include the year of enactment. Absent this information, readers may confuse legislation with identical bill numbers adopted in different years.

Defined terms should be clearly defined and used consistently throughout the document to avoid confusion.

Given the importance of objectives, please provide a heading for them wherever they appear in the document.

Finally, lengthy statutory or technical citations should be placed in footnotes rather than embedded within the body of sentences, as their current placement disrupts readability and unnecessarily burdens the narrative flow of the document.

4. **Specific Corrections and Comments:** The following comments and requested corrections are organized by chapter and page, where applicable:
  - a. **List of Figures, List of Tables, and List of Appendices:** Given the volume and density of text in these lists, we recommend converting the entries to initial capitalization rather than full capitalization. This change would significantly improve readability and ease of reference.

- b. Executive Summary (no page numbers): Much of the Executive Summary is awkwardly written and lacks clarity. For example, the opening sentence—“*Nearly 95 acres of land available for development in Costa Mesa is a transformative opportunity*”—asserts that the site is a “transformative opportunity” without explaining what makes it transformative. This section should be revised to clearly articulate the basis for such conclusions.

Additionally, the final sentence of the opening paragraph begins with the phrase “*More importantly.*” If the point made in that sentence is indeed more important, it should either appear at the beginning of the paragraph or be presented in a separate paragraph with a clear explanation of its significance.

The Executive Summary would also be the appropriate location to include a concise explanation of **what a specific plan is**, rather than requiring the reader to locate this information 30 pages later in the document. Similarly, this section should summarize and briefly discuss the statutory requirements applicable to specific plans to provide context for the reader.

The descriptions of the individual chapters should be expanded and revised to more accurately reflect the actual content of each chapter.

The Executive Summary does not describe the planning process or public participation that led to preparation of the FDCSP. We recommend adding a summary discussion of these topics in the Executive Summary and expanding upon them in a separate, dedicated chapter.

- c. Chapter 1, History & Disposition Process. As noted above, substantial portions of this chapter could be significantly reduced or eliminated, particularly given that the existing buildings will be demolished and the historic use of the site will no longer be relevant. Section 1.1, “Purpose,” on page 12 is duplicative and should be consolidated with the appropriate discussion in the Executive Summary.

This chapter should be reviewed and revised for relevance and internal coherence. Several statements are immaterial to the FDCSP and should be removed. For example, the final sentence of the first paragraph on page 14—“*The FDC was third-newest state hospital facility established during this time period*”—does not inform the reader about the Project or the disposition process and can be eliminated.

In addition, related information within the chapter is not consistently grouped together, which undermines clarity. For example, the standalone statement in the middle of the same paragraph—*“This was due to the expanding population of baby boomers and increased demand from families seeking access to public care”*—does not clearly relate to the preceding sentence, and it is unclear what “this” refers to. Such references should be clarified or removed.

The term *“the State”* is used throughout this chapter but is never formally defined as the State of California. For clarity and consistency, the term should be defined upon first use. Similarly, the document uses the terms *“Costa Mesa”* and *“City”* interchangeably without definition. The term *“FDCSP”* is defined in the Executive Summary, but other parts of the document use *“Specific Plan”* and *“Plan”* to refer to the document. These terms should either be clearly defined or used consistently throughout the document to avoid confusion.

In the first sentence of Section 1.2.2 on page 16, a space should be inserted before the second hyphen, between the words *“and”* and *“-operated.”* In the second sentence, the term *“liberties”* should be replaced with *“rights,”* as the Lanterman Act addresses rights protected by the government rather than civil liberties in the abstract.

Additionally, the Southern Regional Emergency Operations Center is defined on page 17, but the document alternates between the abbreviations *“REOC”* and *“SREOC.”* To avoid confusion with other Regional Emergency Operations Centers, including those located in Mather and Fairfield, the document should use *“SREOC”* consistently throughout.

Finally, this chapter does not identify when the City commenced work on the Project. That information should be included here to provide context for the disposition and planning process. While Section 2.6.1 on page 34 indicates that public outreach began *“in 2023,”* this reference is vague and requires readers to search elsewhere in the document to understand the Project timeline.

- d. Chapter 2, Introduction. With respect to Section 2.1 on page 20, please refer to the comment in Item 4.c above regarding the use of separate “Purpose” sections.

Section 2.2 largely repeats information already contained in Section 1.2. We recommend consolidating this content by moving it into Section 1.2 and providing a cross-reference in Section 2.2, if necessary. Additionally, the second sentence of Section 2.2—*“This is a critical part of the specific plan process”*—should either be

deleted or revised to clarify what “*this*” refers to. As written, the subject of the preceding sentence is “*the purpose of this chapter,*” and the statement does not add clarity or substantive meaning.

The second sentence of Section 2.3.1 on page 22 states: “*The City of Costa Mesa adopted the Costa Mesa General Plan in 2016 . . .*” This is inaccurate. While the General Plan was most recently amended in 2016, the City adopted its original General Plan in 1957, four years after incorporation in 1953. The text should be revised to reflect that 2016 was the year of the most recent amendment, not initial adoption.

In the second sentence of the second paragraph of Section 2.3.1 (page 22), the sentence beginning “*Each jurisdiction has authority to include additional elements...*” should substitute the word “*vision*” for “*development.*” This distinction is important because not all General Plan elements—such as the Safety Element—are properly characterized as development-related.

In the first sentence at the top of page 24, within the same section, the word “*especially*” should be replaced with “*specifically*” to improve precision.

Also in Section 2.3.1, under the heading of “Land Use Element” on page 24, the document should disclose that the General Plan requires a minimum of **25 percent of the Fairview Developmental Center site (approximately 25.6 acres)** to be reserved for park and open space purposes upon redevelopment.

Under the heading “Open Space and Recreation Element” on page 25, we recommend adding language identifying the General Plan requirement for a park level of service of **4.26 acres per 1,000 residents**, as this standard is relevant to evaluating the adequacy of proposed open space under the FDCSP.

In addition, please add language to the effect that Costa Mesa Municipal Code Section 13-255 requires that the amount of land to be dedicated to the City be calculated in accordance with the following formula:

$$A = 4.26 \text{ (D.F. X D.U.)}/1,000$$

Definition of terms:

A—The area in acres required to be dedicated as park sites or to be appraised for fee payment in lieu of dedication.

4.26—Number of acres per 1000 persons.

D.F.—Density factor obtained from section 13-254, Population density, as applicable to the proposed development.

D.U.—Number of dwelling units.

(Ord. No. 97-11, § 2, 5-5-97)

Section 2.5 “Relationship to Other Plans” on page 30 fails to identify or discuss the Pedestrian Master Plan adopted in 2024, and does not discuss its relationship to the FDCSP.

In addition, Section 2.5 identifies the Housing Element as having been adopted in 2023, while the heading of Section 2.5.2 states that it was adopted in 2022. We believe the correct adoption year is 2022; however, this inconsistency should be corrected and confirmed.

More broadly, while Section 2.5 lists various adopted plans, it does not provide a substantive analysis of the relationship between the FDCSP and those plans or describe how the FDCSP will implement or advance their respective goals and policies. This analysis is necessary to meaningfully evaluate consistency among planning documents.

Section 2.5.6 (page 32) Section 2.5.6 discusses the Parks, Recreation, and Open Space Master Plan (2018) without acknowledging that this document remains in draft form. As a draft plan, it has not been formally adopted and may still be subject to revision. The FDCSP should clearly disclose the plan’s draft status and address how reliance on a non-adopted document affects implementation and consistency.

Section 2.6 on page 34 is titled “*Planning Process*,” yet it primarily describes community outreach activities and does not meaningfully explain the planning process itself or how the final Conceptual Land Use Plan was selected. Specifically,

the section does not disclose meetings with key stakeholders, nor does it explain the role of the State, which controlled significant aspects of the planning and disposition process. We recommend addressing these topics comprehensively in a separate, dedicated chapter focused on the planning process and governance structure.

In Section 2.6.1 (page 34), the third sentence of the first paragraph refers to “social media posts” as a form of outreach. Social media posts constitute advertising or information dissemination, not outreach. References to social media posts should be removed from descriptions of public outreach efforts.

The penultimate sentence of the same paragraph states, “*All feedback informed this Specific Plan.*” This statement is overly broad and unsupported. It should be clarified to explain how feedback was evaluated and incorporated, or it should be deleted.

Beginning on page 35, the descriptions of the public workshops are overly informal and include unnecessary narrative phrasing (e.g., “around the room”) that is inappropriate for a formal planning document. These descriptions should be edited for clarity and professionalism. In addition, the description of the March 24 workshop should disclose that participants clearly and vocally requested a town hall–style meeting focused on the FDCSP.

Section 2.6.2 “FDCSP Market Study” on page 38, should define the term “Market Study” upon first use and then use that defined term consistently to avoid confusion with other technical studies referenced in the document.

Under the heading “Housing Demand” (page 38), the second sentence of the first paragraph is overly long and difficult to follow. The sentence should be revised to separate distinct concepts or converted into bullet points for clarity.

It is unclear whether the charts presented on page 39 reflect data specific to Costa Mesa or whether they are based on statewide or nationwide trends. This should be clarified, or the charts should be replaced with data that is directly relevant to the local community.

Continuing in Section 2.6.2, the statement on page 40 that “*These characteristics highlight three main implications...*” lacks sufficient explanation. The document should specify which characteristics are being referenced, who identified them, what the implications are, and the methodology used to reach those conclusions.

On page 41, under the heading “Non-residential Demand” (also Section 2.6.2) the final sentence begins with “*The site would have greater potential for accommodating convenience goods and services...*” without identifying the condition under which this would be true. The sentence should be completed or revised to clearly state the factors that would increase this potential.

Finally, the concluding paragraph on page 41 is unclear and raises significant concerns. It is not evident who is making the recommendations described—whether they originate from the Market Study consultant or another party. Moreover, the paragraph provides little direction regarding non-residential land uses, effectively leaving those decisions to the discretion of a future Master Developer. The purpose of a specific plan is to provide clear policy guidance and development parameters, not to defer critical land use decisions through ambiguity or vagueness.

- e. Chapter 3, Vision and Guiding Principles. It is unclear whether the photographs on page 44 depict locations within Costa Mesa. If they do not, the document should explain their relevance to the FDCSP. Absent such an explanation, the inclusion of these images appears unnecessary and does not contribute substantively to the planning analysis.

With respect to Section 3.1 on page 45, please refer to the comment in Item 4.c above regarding the use of separate “Purpose” sections.

Section 3.2, “Vision Statement” in page 45 has improved from earlier drafts; however, it remains awkwardly written and difficult to follow. In addition, the Vision Statement should explicitly reference the **municipal golf course**, as there is more than one golf course in Costa Mesa and the reference is otherwise unclear. We recommend revising the Vision Statement as follows:

A distinctive place in Costa Mesa, the former Fairview Developmental Center will be redeveloped into a collection of new neighborhoods designed to meet the community’s diverse housing needs. Surrounded primarily by the municipal golf course, the site will be planned to reflect what matters most to the Costa Mesa community—creating an affordable, desirable, and inclusive place to live for families, young adults, and seniors.

Residents of all backgrounds and age groups will have access to high-quality homes, fostering a welcoming environment that promotes a

sense of belonging and inclusion. A variety of housing types and architectural styles will be provided to accommodate a wide range of incomes, household types, life stages, and special needs. Buildings will be sustainably designed and constructed using durable, high-quality, and innovative materials, while infrastructure systems and open spaces will take advantage of opportunities to design with nature and support environmental protection.

The community will be inviting and active, with abundant and accessible outdoor amenities that support relaxation, social interaction, exercise, and play for residents and visitors alike. Streets will prioritize safety, encourage walking, bicycling and the use of public transit, and reduce reliance on automobiles. The Shelley Trail and a network of internal paseos will provide additional pedestrian and bicycle connections throughout the site and link to surrounding regional trail systems.

Through this transformation, the redevelopment of the Fairview Developmental Center will become a valued addition to the City—grounded in the community’s shared values and reflective of the quality of life enjoyed by Costa Mesa residents.

With respect to Section 3.3 “Guiding Principles,” This is the first draft in which expanded Guiding Principles have been presented, as prior versions included only section headings. These principles appear to have been developed by the consultant and do not reflect meaningful public input, which has been limited throughout the process. In addition, the Guiding Principles are awkwardly written and frequently contain disjointed or incomplete sentences, unconnected ideas, and editorial errors, including missing articles. As written, they lack clarity and do not provide a coherent policy framework appropriate for a Specific Plan. Substantial revision is necessary.

We recommend that the existing Guiding Principles be replaced with the following revised principles:

**Principle #1: Advance Costa Mesa’s Housing Goals**

Residential development within the Fairview Developmental Center Specific Plan (“FDCSP”) area shall advance the City of Costa Mesa’s housing objectives as identified in the City’s adopted 2021–2029 Housing Element and

any future adopted Housing Element. These requirements shall apply to all housing developed by the Master Developer, as well as the planned housing to be developed by the State's Department of Developmental Services.

The FDCSP community shall support a diverse range of dwelling types to accommodate varying household types, income levels, and special needs, thereby fostering a balanced and inclusive resident population. Affordable housing may be provided in stand-alone buildings or integrated within market-rate developments. The architectural design, construction quality, and materials used for affordable housing shall be comparable to those used for market-rate housing.

**Principle #2: Create a Network of Connected Gathering Places and Accessible Open Spaces**

A comprehensive and interconnected system of public open spaces and recreational facilities shall be distributed throughout the site, including parks, paseos, and trails. Open space requirements shall be satisfied through a combination of dedicated public park land, park improvements, and park-in-lieu fees, consistent with Title 12, Chapter XII, Article 4 (Park and Recreation Impact Fees) of the Costa Mesa Municipal Code.

Public parks shall provide a wide range of community-serving amenities, such as sports facilities, multipurpose fields, walking paths, playgrounds, and seating areas. Gathering places shall reflect the diversity and culture of Costa Mesa and be designed to be attractive, welcoming, and accessible to all. These spaces shall promote an active lifestyle that supports both physical and mental health.

**Principle #3: Provide Neighborhood-Serving Retail and Community Amenities**

The FDCSP shall allow for and encourage neighborhood-serving retail and community amenities that meet the daily needs of current and future residents. Such uses may be incorporated within mixed-use buildings featuring ground-floor commercial spaces with residential uses above, or within small-scale centers that are easily accessible from surrounding neighborhoods. Appropriate uses may include local-serving retail and food establishments, as well as community facilities such as libraries, art studios, fitness centers, places

of worship, and other spaces that foster social interaction and community engagement.

**Principle #4: Prioritize Multimodal Transportation and Safety**

Walking, bicycling, and public transit shall be prioritized as the most convenient and desirable modes of transportation within and to the FDCSP area. An interconnected network of streets, paseos, and trails, combined with smaller block sizes, shall enhance mobility, accessibility, and neighborhood connectivity. Multiple circulation routes shall help disperse vehicular traffic while providing efficient access for emergency services.

Streets shall incorporate safety-focused design features, including high-visibility crosswalks, buffered bicycle facilities, traffic-calming measures, and conveniently located transit stops. Car-sharing and electric vehicle-sharing services shall be encouraged to reduce reliance on private automobiles. Site design for all uses shall include adequate curbside pick-up and drop-off areas and convenient access to public transit.

The Shelley Circle Loop Trail shall be located along the perimeter of the site adjacent to the golf course, with a potential connection to the Tanager Trail. One or more paseos shall provide off-street pedestrian and bicycle connections across the site, linking neighborhoods to parks and the Shelley Circle Loop Trail. Private and common open spaces associated with residential developments shall complement and enhance the broader public open space network.

**Principle #5: Integrate the Natural and Built Environment**

Redevelopment of the FDC site presents an opportunity to implement a holistic and sustainable approach to site planning, building design, and infrastructure. The Specific Plan shall encourage integration of natural systems into the built environment through passive heating and cooling strategies, green infrastructure, sustainable building materials, and water-efficient landscaping. Outdoor spaces shall be designed to mitigate heat, expand tree canopy, and restore native plant communities, thereby enhancing environmental resilience and overall quality of life.

**Principle #6: Preserve and Reuse Buildings, Infrastructure, Gardens, and Trees Where Feasible**

Preservation and adaptive reuse of key buildings and infrastructure, where feasible, along with conservation of historic gardens and mature trees, shall be encouraged to honor the cultural heritage and agricultural history of Costa Mesa and the Fairview Developmental Center. Reuse of existing assets can also reduce the carbon footprint associated with demolition and the production and transportation of new construction materials.

**Principle #7: Ensure Long-Term Fiscal Sustainability**

Pursue fiscal sustainability over the long-term using a combination of reduced costs and public and private funding for site work, infrastructure services and community benefits. New development will not burden existing taxpayers and projects will pay for themselves through taxes, fees, or assessment districts.

- f. Chapter 4, Land Use & Urban Design. With respect to Section 4.1 (page 50), please refer to the comment in Item 4.c above regarding the use of separate “Purpose” sections.

Section 4.2 (page 50) identifies a set of “urban design objectives,” but does not disclose the source of these objectives. The origin of these objectives must be clearly stated. It is unclear whether they were developed by the consultant. They do not appear to be derived from the Land Use Element of the General Plan, nor is there any discussion or analysis explaining how they relate to that Element. Additionally, these objectives do not appear to reflect citywide urban design objectives.

The public was not presented with these objectives, nor did they have an opportunity to provide input at any of the outreach meetings. Accordingly, we recommend removing the current “urban design objectives” and replacing them with objectives that are clearly aligned with those contained in the Land Use Element.

Alternatively, if these objectives are intended to be preliminary or draft, it is unclear why they were not presented to the public during the outreach process. If the public is expected to comment on these draft objectives, we reserve the right to submit additional comments at a later date. **Please confirm.**

On page 52, in Section 4.2.1, “Buildout and Land Use Designations,” within the paragraph under the subheading “Department of Developmental Services (DDS Housing),” please replace the word “*scale*” with “*height, density, and mass.*”

Section 4.3 (page 54) introduces yet another list of “urban design objectives.” In the penultimate sentence of the first paragraph, there is a reference to “objectives in Section 4.1,” which appears to be a cross-referencing error. This set of objectives does not align with those previously listed, nor does it appear to originate from the Land Use Element. Once again, the public has had no opportunity to review or comment on these objectives. Please provide clarification regarding their origin and contextual purpose.

Please revise the first Note in Table 4-1 (page 53) to add the following sentence: “*The income categories are also found in Table 4-2 on page 57.*”

Please also add the proposed residential densities/FAR to the proposed building sites depicted on the Conceptual Site Plan (Figure 4-2) on page 55.

In Section 4.4, “Housing Plan” (page 56), yet another set of “urban design objectives” is presented. Our comments regarding the objectives in Sections 4.2 and 4.3 apply equally here. We again reserve the right to provide additional comment once the source and rationale for these objectives have been disclosed.

We have serious concerns regarding Section 4.4.1 (page 57). The fourth bullet point states that there will be “income-restricted buildings/units.” Restricting all low-income housing to a single building would raise concerns related to redlining and segregation. Please clarify the intent of this statement.

In the second paragraph of text in Section 4.4.1, delete the word “*may*” and replace it with “*shall.*”

In Section 4.5, “Uses” (page 58), please provide a citation to the applicable state legislation or other official documentation supporting the statement that “*residential uses shall be the predominant allowed use for the plan area.*” Any correspondence between the State and the City on this matter should be included as an appendix or otherwise attached to the FDCSP document.

With respect to Section 4.6, “Development and Design Standards” (page 63), please explain how these standards relate to and implement the stated “urban design objectives.”

In Figure 4-3, “Building Form, Scale, and Massing” (Page 66), please identify the approximate building heights illustrated.

Section 4.6.10, “Historic Requirements” (page 75), includes the following two statements:

- *“The proposed specific plan project will include **removal of all or a significant portion of the FDC**, which will impact the site’s historic district designation.”* (Emphasis added)
- *“However, it was found that **neither the FDC as a whole, nor any individual resources within the FDC**, meet the eligibility requirements to be a California Historical Landmark.”* (Emphasis added)

Given the significance of these statements, we request that this section be relocated to Chapter 1, “History and Disposition Process.”

- g. Chapter 5, Mobility. With respect to Section 5.1 (page 78), please refer to the comment in Item 4.c above regarding the use of separate “Purpose” sections

Section 5.2 (page 78) introduces yet another set of “objectives.” These objectives do not appear to be derived from, or grounded in, the Circulation Element of the City’s General Plan. Once again, the public has not been given an opportunity to review or comment on these objectives. Please clarify their origin, authorship, and intended relationship to the Circulation Element.

In addition, Section 5.2.4, “Pedestrian Connectivity” (page 92), does not acknowledge or reference the requirement for the FDCSP to comply with the City’s Pedestrian Master Plan. Please revise this section to explicitly state that pedestrian improvements and connectivity must be consistent with the City’s adopted Pedestrian Master Plan.

- h. Chapter 6, Open Space, Landscaping & Public Art. With respect to Section 6.1 (page 104), please refer to the comment in Item 4.c above regarding the use of separate “Purpose” sections.

Later in Section 6.1, without a heading to distinguish the text from the stated “Purpose,” an additional set of “objectives” is introduced. These objectives do not appear to be derived from, or grounded in, the Open Space and Recreation Element of the General Plan. Once again, the public has not been afforded an opportunity to review or comment on these objectives. Please clarify their origin, authorship, and intended relationship to the Open Space and Recreation Element. In addition, please provide a heading for this section.

In Section 6.2, “Open Space and Trails Plan” (page 106), under the heading “Public Open Space,” the final sentence references “*temporary open spaces such as street closures.*” Streets that are designed for motor vehicle traffic—and that may be reopened to such traffic at any time, other than for emergency access—should not be classified or counted as open space under any circumstances. This same concern applies to the “Paseo.”

In the caption beneath the illustration on page 110, please delete the word “*can*” and replace it with “*shall*.” The use of passive voice should be minimized to avoid ambiguity and potential misinterpretation.

Figure 6-3, “Paseo” (page 111), depicts surfaces such as cobblestones or stamped concrete. Please consider specifying a smooth, accessible surface, as raised or uneven materials can be difficult for both pedestrian and bicycle use. Trails and pedestrian pathways should comply with the City’s adopted Active Transportation Plan and Pedestrian Master Plan.

- i. Chapter 7, Infrastructure and Public Services. With respect to Section 7.1 (page 122), please refer to the comment in Item 4.c above regarding the use of separate “Purpose” sections.

The disclosure in red text in Section 7.2.2, “Water and Sewer” (page 123), is surprising and raises significant concerns. Shouldn’t a technical analysis prepared by the Mesa Water District—one that evaluates the District’s ability to support the projected water demands of the proposed community—be completed *before* the scale of residential and commercial development is determined?

The following paragraph references the Mesa Water District’s \$70 million Capital Improvement Program Renewal and its annual Capital Replacement and Refurbishment Program. Please clarify whether the Master Developer is responsible for all costs associated with providing water and wastewater services to the FDCSP

site. If Mesa Water District and its ratepayers are not expected to bear these costs, the relevance of describing the District’s capital programs is unclear. Table 8.3 “Implementation and Conceptual Phasing” (pages 146 and 147) indicates that these costs—including water, wastewater, and storm drain infrastructure—are the responsibility of the Master Developer. Please either cross-reference Table 8.3 in this section or restate that information here for clarity and consistency.

Section 7.2.4, “Public Services” (pages 131–132), does not address the anticipated costs of new police and fire facilities, identify potential funding mechanisms, or specify whether economic responsibility will rest with the City, the State, the Master Developer, or future residents. This information should be provided.

Finally, in the second bullet point on page 132 (first column), please insert a space between the words “Station” and “5.”

5. Chapter 8, Administration & Implementation. With respect to Section 8.1 (page 136), please refer to the comment in Item 4.c above regarding the use of separate “Purpose” sections. In addition, the final sentence of this section references “financing measures for implementing development proposals,” yet no such financing measures are identified. Please clarify or identify the applicable financing mechanisms.

Throughout this chapter, the terms “Specific Plan,” “Plan,” and “FDCSP” are used interchangeably. For clarity and consistency, please use “FDCSP” throughout, or revise the document so that it consistently aligns with the defined term that is selected.

With respect to the “Preliminary Review Application” referenced in Section 8.2.6, “Application Review and Processing” (page 137), please clarify to which agency the Master Developer is required to submit the preliminary review application.

Table 8-1, “Development Application Process and Review Authority” (page 140), indicates that the City will review the Development Agreement. Our understanding, based on the City’s agreement with the State, is that the City has review authority over the Development Agreement between the State and the Master Developer. Please clarify whether the State has comparable review authority over the Development Agreement between the City and the Master Developer.

Additionally, please clarify whether the Planning Commission and City Council will review and approve the “Affordable Housing Implementation Plan” required under Section 8.3.5.

In the first sentence of Section 8.3.4, “Development Impact Fees” (page 144), please delete the word “*may*” and replace it with “*shall*.” As this document serves both planning and legal functions, passive language should be minimized to avoid ambiguity and potential misinterpretation.

Further, the Development Impact Fees described in Section 8.3.4 should be expressly incorporated into the Development Agreement between the City and the Master Developer. Please add language to this section to that effect.

In Section 8.3.5 “Affordable Housing Requirements/Program” on page 145, under the Heading “Alternative Means of Compliance,” the income levels need hyphens inserted where appropriate (for example, between “low” and “income.” Additionally in this Section, will the method of the alternative means of compliance include an in-lieu fee? If that is not allowed, it should be specified.

- a. Appendix A, Definitions. Please review the document for all defined terms and ensure they are included in this appendix. We note in particular that the defined term “Development Agreement” is used throughout the document but is not defined. A clear definition should be added. In addition, the definition of “Market Rate Housing” needs to be clarified to include the income categories of “Moderate Income and “Above Moderate Income.”
- b. Appendix C, Market Study: The most recent revision date for the Market Study is November 2024. This study should be updated to reflect the implications of the new Conceptual Land Use Plan selected in 2025. In addition, the Market Study does not account for the need for new police and fire facilities associated with the proposed development. These omissions should be addressed.
- c. Appendix D, General Plan Policies. This appendix includes existing policies from the General Plan; however, it is notably incomplete. Policies from the Circulation Element, the Active Transportation Plan, and the Pedestrian Master Plan are missing and should be incorporated. In addition, relevant goals and objectives from the Arts & Culture Master Plan should be included. Further, this Appendix should provide a substantive analysis of the relationship between the FDCSP and the General Plan and how the FDCSP implements the General Plan.

We further recommend adding a **new, separate appendix** that consolidates and clearly identifies **all new objectives introduced by the FDCSP**, along with development regulations/standards and design guidelines that pertain to the FDCSP.

6. **Further Considerations.** The project kickoff occurred in 2023. Now, nearly halfway through 2026, the public is reviewing a proposed Specific Plan document for the first time. The City declined to establish an advisory committee for the Specific Plan, citing concerns that such a process would take too long. In retrospect, that decision appears to have had the effect—if not the intent—of limiting meaningful public involvement in a document that will have lasting consequences for the entire City of Costa Mesa.

This outcome is deeply disappointing. Had the City followed the advice of former Economic and Development Services Director Jennifer Le and convened an advisory committee, the resulting document would almost certainly be more complete, coherent, and accurate. Instead, the draft before us is of notably poor quality. The fact that it required more than twenty pages of detailed comments identifying mostly major corrections and deficiencies is itself evidence of the inadequacy and carelessness of the work product. Compounding this concern is the fact that two of the most critical components of the project—the Environmental Impact Report and a comprehensive fiscal impact analysis—have not yet been provided.

We are gravely concerned that the overriding purpose of the FDCSP, as currently drafted, is simply to satisfy State requirements. Although the City's agreement with the State explicitly grants the City the authority to plan the Specific Plan Area, that authority appears to have been effectively relinquished. The document reflects a narrow focus on meeting housing mandates, rather than advancing a well-considered vision for a vibrant, inclusive, and livable community that residents will want to call home.

Public input throughout the document is minimal at best. The Plan is drafted in a manner that strongly favors the State's interests, to the extent that even a Master Developer may struggle to design a project that meaningfully complies with its vague and often conflicting objectives, development standards, and design guidelines. These requirements are scattered throughout multiple chapters, rather than being clearly consolidated in a single, accessible section where both the Master Developer and the public can readily understand them.

Notably absent from the document are the community benefits repeatedly requested by residents during outreach discussions: an art center; community gardens; a transit center

with meaningful access to public transportation; affordable childcare; and other amenities that contribute to a complete and balanced community.

Most troubling of all is the continued failure to provide adequate open space. For years, the public has consistently advocated for sufficient parkland on this site. Instead, the City is compounding the problem by proposing open space that does not meet minimum General Plan requirements and relying on the concept of park in-lieu fees as a substitute. This approach should be abandoned. The amount of parkland provided on-site should, at a minimum, meet the standards already established in the General Plan.

Finally, the most important question remains unanswered: How does this project advance the City of Costa Mesa's long-term vision? How does it fit into the City's plans for the next 20 years—or the next 40 years? The redevelopment of the Fairview Developmental Center is a defining opportunity and a critical piece of that broader vision. Yet it is impossible to assemble the larger puzzle when essential pieces—public input, environmental review, financial analysis, infrastructure planning, and a coherent community vision—are still missing.

**Conclusion.** The redevelopment of the Fairview Developmental Center represents a once-in-a-generation opportunity for the City of Costa Mesa. It is a project with citywide implications—social, environmental, fiscal, and civic—that will shape the community for decades to come. As such, it demands a Specific Plan that is clear, legally sound, thoroughly vetted, and rooted in a shared vision for the City's future.

Unfortunately, as detailed throughout these comments, the draft Fairview Developmental Center Specific Plan falls well short of that standard. The document contains significant internal inconsistencies, lacks critical supporting analysis, omits essential policy relationships, and repeatedly introduces objectives and requirements without clear origin, authority, or public input. Taken together, these deficiencies undermine both the usability and credibility of the Plan.

Equally concerning is the absence of key components that are foundational to informed decision-making, including the Environmental Impact Report and a comprehensive fiscal analysis. Without these materials, neither the public nor decision-makers can fully understand the consequences of the proposed development or evaluate whether it serves the long-term interests of Costa Mesa.

We strongly urge the City to pause further advancement of the FDCSP and undertake a substantive revision process that meaningfully incorporates public participation, clarifies

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regulatory and financial responsibilities, consolidates development standards, and aligns the Plan with the City's General Plan, adopted master plans, and stated community values. Doing so will not only result in a stronger and more defensible Specific Plan, but also restore public confidence in a process that should reflect transparency, accountability, and thoughtful stewardship of this irreplaceable public asset.

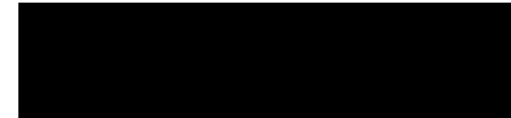
Costa Mesa deserves a Fairview Developmental Center redevelopment that is more than a compliance exercise—it should be a model of sound planning, civic leadership, and community collaboration. We respectfully request that the City revise the draft Specific Plan accordingly before proceeding further.

Please feel free to contact us should you have any questions.

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.

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