

# COSTA MESA



April 13, 2023

VIA EMAIL – [comments@oesregionsoutheoc.org](mailto:comments@oesregionsoutheoc.org)

State of California  
Department of General Services  
Real Estate Division, Project Management  
Attn: Terry Ash, Senior Environmental Planner  
2635 North First Street, Suite 1490  
San Jose, California 95134

Re: Proposed Southern Region Emergency Operations Center Project

Dear Ms. Ash:

Thank you for the opportunity to provide comments to the preparation of an Environmental Impact Report for the proposed Southern Region Emergency Operations Center Project (the “Project”) to be located at Fairview Developmental Center (“FDC”) in Costa Mesa, California. The Notice of Preparation/Notice of Public Scoping Meeting (“NOP”) indicates that the Project would occupy approximately 15 acres of the 110 acres of FDC and consists of a 35,000 sq. ft. office building, a 20,000 sq. ft. warehouse, a helipad (unknown size) and a 120 ft. communications tower. The Project would be located next to proposed high-density housing for low- and very low-income residents, park space and possibly community center and gardens and a school/daycare. In addition, there is an existing recreation area (municipal golf course) adjacent to the Project and a neighborhood of existing affordable housing approximately 600 ft. away. It is approximately 1,500 ft. from Fairview Park, a nature park that contains environmentally sensitive species and habitat areas. We are submitting the following comments for consideration by the State of California (the “State”) as it prepares the draft environmental impact report (“EIR”):

1. **The Project.** As noted above, the project consists of a 35,000 sq. ft. office building, a 20,000 sq. ft. warehouse, a helipad (unknown size) and a 120 ft. communications tower. The warehouse component would also have a vehicle maintenance bay and space for life-

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sustaining commodities. The Project may require backup generators for loss of power during a disaster. The NOP does not disclose how many vehicles would be maintained on the Project, nor the hours of operation. The NOP does not disclose if the warehouse would include refrigeration uses. Warehouses with cold storage require diesel trucks with transport refrigeration units that emit high levels of toxic particulate matter, nitrogen oxides and greenhouse gas emissions. By the nature of the Project, it may contain a fueling facility or alternative fueling facility for a secure fuel supply for vehicles used in emergency operations. Because fossil-based fuel supplies are usually stored underground, there is the potential for unseen leakage and contamination. In addition, grading and construction activities, greenhouse gas emissions would be emitted through the operation of construction equipment, which typically uses fossil-based fuels to operate.

2. **Project Location Would Impact Adjacent Housing and Amenities.** The project would allow for the development of a large office building and large warehouse adjacent to what is intended to be high-density housing, and possibly a park, community garden and a school/daycare that would serve low- and very low-income adults and children. In addition, it would be bordered on two sides by the only municipal golf course in the city of Costa Mesa. There already exists a neighborhood of affordable housing on nearby Joann Street (Census Tract 6059063808), whose residents are 80% people of color. CalEnviroScreen 4.0 ranks this census tract at a pollution burden of 46%, which is remarkably high for a neighborhood so close to a municipal golf course and receiving the benefit of ocean breezes. Please note that this census tract is near to other census tracts with higher burdens, including Census Tract 6059063605, which has a pollution burden of 86%. The residences are older buildings, many of which do not have central heating and air conditioning or air filtration systems. A short distance away is a high school that serves the aforementioned Census Tracts, including sports fields, tennis courts and a stadium that are also used by the general public. The residents in these Census Tracts, and others, would not only be impacted by the operation of the Project, but by the actual construction of the Project. This Project would exacerbate the environmental and health problems faced by the families that live nearby.
3. **Impacts on Biological Resources.** As noted above, the proposed Project is near Fairview Park, which contains environmentally sensitive species and habitat as documented by multiple studies, many of which can be found at <https://www.costamesaca.gov/community/fairview-park/biological-reports>. Costa Mesa has always been a little town near the beach with primarily one- or two-story buildings, except for the high-rise area near South Coast Plaza. The Costa Mesa Historical Society has documentation that the parks and open space were laid out so that the ocean breeze would pass through town. FDC was part of that plan and that air circulation plan needs to

be preserved. In addition, the movement and migration of wildlife species has been substantially altered due to habitat fragmentation over the past century. FDC has been used by migratory birds and local wildlife as a wildlife corridor. Surveys of the surrounding areas for wildlife and ecologically sensitive habitat must be conducted and reports provided. The linkages or migration corridors between habitat areas must be preserved. The EIR should evaluate how the Project accomplishes or fails to implement the environmental goals, objectives, and policies of the Costa Mesa General Plan.

4. **Water Sources.** Costa Mesa groundwater collects in underground aquifers that are approximately 2,500 feet beneath the ground surface. Mesa Water District owns and operates eight groundwater production wells that pump water from the Orange County Groundwater Basin. Costa Mesa depends upon imported water for a portion of its water supply, therefore, any more demand could impact the water supply for existing residents and businesses. The availability of imported water is directly related to the water supply conditions in the source watersheds, as well as demand for water throughout the State.
5. **Project Location is a Historic District.** As stated in the NOP, FDC “has been determined to be an historic district known as the Fairview State Hospital Historic District.” Prior to use as a state hospital, the land was historically used for farming, in fact, there is still a small orchard on the site, along with fruit trees interspersed through the numerous buildings. While closure of FDC is proceeding, we note that the selection of the Project site within FDC is one with few historic buildings, which means that if the City of Costa Mesa (the “City”) were to rezone the property for residential use along with other uses that compliment residential use, preservation of any historic buildings likely would not be viable, including an auditorium located close to the Project that could be converted to a community center/playhouse/sports facility. The existing buildings are historically significant to the neighborhood and meet the definition of “contributing” because their integrity has been maintained to their original design. To the extent possible, the existing buildings need to be protected to preserve the authentic and unique character of this neighborhood.
6. **Visual Impacts and Neighborhood Character.** To the extent feasible, the EIR should include an evaluation of potential impacts on the natural landforms resulting from implementation of project components. The communication tower component of the Project exceeds the allowed height or bulk regulations and existing patterns of development in the surrounding area by a significant margin, and is located in a highly visible area and would strongly contrast with the surrounding development or natural topography through excessive bulk or architectural projection. The EIR should include a conceptual description and analysis of the allowed building mass, bulk, height, and

architectural style that could result from the Project. The EIR should also analyze the use of materials or components that could emit or reflect a significant amount of light or glare, and any potential effect on light-sensitive species. Renderings, cross-sections, and/or visual simulations of new or modified structures and buildings proposed to be built should be incorporated into the EIR.

7. **The State Must Comprehensively Evaluate the Project's Environmental Impacts and Consider All Feasible Measures to Mitigate Potentially Significant Impacts.**

The purpose of CEQA is to ensure that a project's lead agency fully evaluates, discloses, and mitigate (where feasible) significant environmental effects. An environmental impact report serves as the informational document that informs the public and decisionmakers of the significant environmental effects of a project and the ways in which those effects may be minimized. Projects of this type and size typically involve significant environmental impacts, so the EIR must contain sufficient detail for the residents of Costa Mesa to understand and meaningfully consider the issues raised by the Project. This includes the following:

- Criteria for locating the Project at FDC
- List other sites considered
- Criteria for locating the Project on the specific site within FDC
- Provide normal operation days and time
- Identify the number of employees expected during normal operation
- Date that site of the Project was selected
- Date of notification of City of Costa Mesa for site selection
- Identify and map any easements and mineral/oil/gas/drilling rights held on the property by anyone other than the State
- Provide the buffer zone requirements between the Project and other parts of FDC where the City has proposed housing
- Identify impacts caused by demolition of existing buildings, construction of the Project, and mitigation efforts that will be undertaken
- Describe any anticipated substantial change to natural topography or other ground surface relief features through landform alteration
- Provide depictions of any blockage of public views from designated open space land areas, roads, or to any significant visual landmarks or scenic vistas that would result from the Project
- Description any efforts to mitigate the Project's substantial alteration to the existing character of the area in terms of compatibility with the bulk, scale, materials, or style of surrounding development

- Describe any economic and social equity benefit programs, including programs to hire local residents for both the construction and operation of the Project
- Provide a description of any air filtration and climate control systems to be installed as part of the Project, both at the Project and nearby residences
- Provide a detailed traffic study, including the number of trucks and other equipment, diesel or otherwise, and how close the truck/transportation routes will be to the aforementioned Census Tracts
- Identify programs for mitigating greenhouse gases, including the use of zero-emissions technology, van pools, carpool incentives, bike share, no idling policy, etc.
- Describe any programs for mitigation of diesel particulate matter generated by the Project
- Provide the location and description of any transit stops, sidewalks, bicycle lanes, multiuser paths, crosswalks, traffic control or traffic safety measures, such as speed bumps/tables, speed limit reductions, addition or reduction of traffic lanes, and new roadways that will be required or provided as part of the Project
- Describe how secured and/or nonpublic access to and from Harbor Boulevard and the facility will be achieved, i.e., any new access road(s), additional paving, and how will that impact the land available for planning of new housing on the remainder of FDC
- Describe any significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect
- Describe the history of the designation of the site as a Historic District and what steps the State will take to preserve it, including the buildings and historic farmland
- Describe how the Project's buildings will improve the aesthetics of the area and how they will reflect the City's motto "City of the Arts"
- Provide a detailed description of how the visual impact of the communications tower, which is significantly taller than any other nearby structure or communications equipment, will be mitigated
- List the cultural/tribal cultural resources that will be considered and any required mitigation
- Describe improvements to vegetation and tree canopy for residents in and around the project and visitors to the project
- Identify and address in detail the biological resources that will be considered/impacted as identified by a variety of sources, including but not limited to, the California Department of Fish and Game's California Natural

Diversity Database, the California Native Plant Society's Electronic Inventory, the U.S. Fish and Wildlife Service's list of Federal Endangered and Threatened Species, the federal Migratory Bird Treaty Act, local habitat conservation plans or policies, as well a variety of other environmental resources, and any proposed mitigation programs

- Provide copies of any wildlife and habitat survey reports done in connection with the Project site and the surrounding area
- Describe any irreversible and irretrievable commitment of resources, including the adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency that would impact nonrenewable resources and the associated impacts that this consumption could have on future generations
- Identify special consideration and mitigation techniques used for the warehouse, any cold storage facilities, and transport refrigeration units
- Identify (1) any hazardous materials, hazardous substances or waste material that currently exist on the site, and (2) any hazardous materials, including fuel, which will be stored and/or used on the Project or in the construction of the Project and plans for containment of hazardous materials in the event of a spill or other accident
- Provide details on how the Project will adhere to California green building and LEED standards
- Describe whether groundwater supplies will decrease or if the Project, either upon completion or during construction, will interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin or conflict with a sustainable groundwater management plan
- Provide details of how the Project, either upon completion or during construction, will meet or fail to meet existing water quality standards or waste discharge requirements, or otherwise substantially degrade surface water quality, or conflict with a water quality control plan
- Describe if the Project will generate a substantial increase in ambient noise levels in the vicinity of the Project in excess of standards established in the Costa Mesa General Plan or noise ordinances, or applicable standards of other agencies or result in generation of excessive ground borne vibration or noise levels in the vicinity of the Project, including the use of the proposed helipad
- Provide details of any construction of new or expansion of existing utilities that could cause significant environmental effects, generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities



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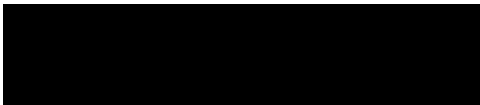
In addition, please explain why impacts on recreation, energy (efficiency or renewable energy), and population and housing have been determined likely not affected or “less than significant”, particularly given the fact that the State has directed the City of Costa Mesa to provide more than 11,000 new housing units in the City and the Project site is the location identified in the City of Costa Mesa’s Sixth Cycle Housing Element as the site planned for construction of the most new housing units.

8. **Conclusion.** When executed well, a CEQA analysis promotes sustainable development and builds trust with the public. The EIR for this Project gives the State an opportunity to serve the residents of Costa Mesa by transparently evaluating, disclosing, and mitigating the environmental impacts of this Project. In order to serve the community, we ask that the State comprehensively identify and evaluate all the impacts of the Project, in particular those affecting the many nearby sensitive receptors. CEQA entitles the residents to full disclosure and mitigation of the environmental impacts of the Project prior to its approval.

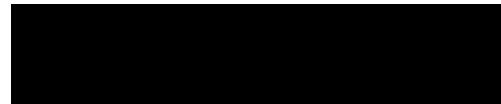
In order to maximize public participation, we request that any future public meetings be held at a time when most Costa Mesa residents are available. A combination of weeknight meetings that start no earlier than 6:00 p.m. and weekend meetings held during the day is preferred.

Thank you for your attention. Please feel free to contact us should you have any questions.

Very truly yours,



Richard J. Huffman  
Treasurer



Cynthia McDonald  
Assistant Treasurer

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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