



## Appendix B NOP Comments



## Appendices

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# AIRPORT LAND USE COMMISSION

FOR ORANGE COUNTY

3160 Airway Avenue • Costa Mesa, California 92626 • 949.252.5170 fax: 949.252.6012

June 20, 2019

Mino Ashabi, Principal Planner  
City of Costa Mesa  
Development Services Department  
77 Fair Drive  
Costa Mesa, CA 92626

Subject: NOP of an EIR for One Metro West Project

Dear Ms. Ashabi:

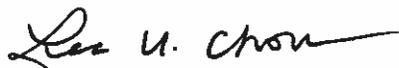
Thank you for the opportunity to review the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the One Metro West Project located at 1683 Sunflower Avenue, Costa Mesa, 92626 in the context of the Airport Land Use Commission's *Airport Environs Land Use Plan for John Wayne Airport (JWA AELUP)*. The proposed project is a mixed-use development and consists of residential, specialty retail, creative office, and recreational uses. The project is proposed to include up to 1,057 dwelling units, 25,000 square feet of commercial creative office, 6,000 square feet of specialty retail, and 1.7 acres of open space. The proposed project would also require an amendment to the City's General Plan in order to change the existing land use designation from Industrial Park to Urban Center Commercial.

The proposed project is located within the Federal Aviation Regulation (FAR) Part 77 Notification Area for JWA. We suggest that the EIR discuss the height at which the notification surface would be penetrated compared to the proposed building heights. We recommend that the project proponent utilize the Notice of Proposed Construction or Alteration (NOC) on the Federal Aviation Administration (FAA) website <https://ocaaa.faa.gov/ocaaa/external/portal.jsp> to determine if the proposed project penetrates the notification surface and requires filing Form 7460-1 Notice of Proposed Construction or Alteration with the FAA.

A referral by the City to the ALUC may be required for this project due to the location of the proposal within a JWA AELUP Planning Area and due to the nature of the required City approvals (i.e., General Plan Amendment and Zone Change) under PUC Section 21676(b). In this regard, please note that the Commission suggests such referrals be submitted to the ALUC for a determination, between the Local Agency's expected Planning Commission and City Council hearings. Since the ALUC meets on the third Thursday afternoon of each month, submittals must be received in the ALUC office by the first of the month to ensure sufficient time for review, analysis, and agendaing.

Thank you for the opportunity to comment on this NOP. Please contact me at (949) 252-5123 or via email at [lchoum@ocair.com](mailto:lchoum@ocair.com) if you need any additional details or information.

Sincerely,

A handwritten signature in black ink that reads "Lea U. Choum". The signature is written in a cursive style with a long horizontal flourish at the end.

Lea U. Choum  
Executive Officer

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 12  
1750 EAST FOURTH STREET, SUITE 100  
SANTA ANA, CA 92705  
PHONE (657) 328-6267  
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a California Way of Life.*

Governor's Office of Planning & Research

**JUNE 20 2019**

**STATE CLEARINGHOUSE**

June 19, 2019

Ms. Minoo Ashabi  
City of Costa Mesa  
77 Fair Drive  
Costa Mesa, CA 92626

File: IGR/CEQA  
SCH#: 2019050014  
IGR LOG# 2019-01138  
I-405  
PM 12.128

Dear Miss Ashabi,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Notice of Preparation (NOP) for the One Metro West draft Environmental Impact Report (EIR). The proposed mixed-use One Metro West Project consists of the development of 15.6 acres located at 1683 Sunflower Avenue which includes: residential with up to 1,057 rental dwelling units, 6,000 square feet of specialty retail, 25,000 square feet of creative office, and recreational uses. The nearest State facility to the project site is Interstate 405 (I-405).

Caltrans is a responsible agency on this project and has the following comments:

1. Regional access to the project site is primarily through the I-405 Freeway, therefore, the document should include a discussion on any potential impacts of this project on I-405 ramps and mainline. Further, a discussion on the potential need for a Traffic Management Plan is required.
2. A traffic impact study is required for this project to include existing and future average daily traffic volumes, traffic generation including peak hour, traffic distribution, intersection capacity utilization analysis along with current and projected capacities of local streets, and State highways or freeways including ramps that might be impacted. Specifically, Harbor Boulevard and I-405 ramps as well as Euclid Street and I-405 ramps. Appropriate mitigation measures are to be proposed and submitted for our review and comment.
3. Extend the limits of Potential Off-Site Impact Area on Figure 2 to include the intersection of Hyland Avenue and South Coast Drive. The document needs to address potential impacts on storage capacity for the right turn pocket to the northbound I-405 from westbound Hyland Avenue.

4. Coordination with San Diego Freeway (I-405) Improvement Project is required, and a discussion should be included in the environmental document.
5. Please consider incorporating designated areas/parking for freight delivery, package and transportation network center pick up and drop off in the site plan design for this project.
6. Please ensure that appropriate measures are taken to protect the safety of bicyclists and pedestrians in the project area. These measures may include improved Complete Streets facilities and improved connections to these facilities. Nearby bicycle facilities include the existing Class I Santa Ana River Trail (approximately 0.2 miles west of the Project site), existing Class II bicycle lanes on Sunflower Avenue and Hyland Avenue, and proposed Class I facility on Sunflower Avenue. Complete Streets improvements will also increase regional connectivity via the Santa Ana River Trail.
7. Please consider adding wayfinding signage for the bicycle facilities in the project area, including the Class I Santa Ana River Trail. Wayfinding signage will connect and direct bicyclists to the appropriate bicycle facilities.
8. Please consider adding Active Transportation elements to the Project, such as bicycle parking/storage. This will encourage residents to ride their bicycles to access nearby destinations.
9. In the event of any activity in Caltrans right of way an encroachment permit will be required. For specific details on Encroachment Permits procedure, please refer to Encroachment Permits Manual at:  
[www.dot.ca.gov/hq/traffops/developserv/permits](http://www.dot.ca.gov/hq/traffops/developserv/permits)

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Maryam Molavi at (657) 328-6280 or [maryam.molavi@dot.ca.gov](mailto:maryam.molavi@dot.ca.gov).

Sincerely,



Scott Shelley  
Branch Chief, Regional-IGR-Transit Planning  
District 12



June 20, 2019

Minoo Ashabi  
Principal Planner  
City of Costa Mesa  
Development Services Department  
77 Fair Drive  
Costa Mesa, CA 92626

**Subject: Notice of Preparation of an Environmental Impact Report for One Metro West in the City of Costa Mesa**

Dear Minoo Ashabi:

The City of Irvine is in receipt of a Notice of Preparation for an Environmental Impact Report (EIR) for One Metro West located at 1683 Sunflower Avenue in the City of Costa Mesa. The proposed project is a mixed-use development consisting of residential, specialty retail, creative office, and recreational uses. The proposed project includes 1,057 dwelling units (anticipated for rental), 25,000 sf of commercial creative office, 6,000 sf of specialty retail, and 1.7 acres of open spaces.

Staff has no comments at this time. The City looks forward to receiving the draft EIR once the document is available for review. If you have any questions, please contact me at 949-724-6364 or at [jequina@cityofirvine.org](mailto:jequina@cityofirvine.org).

Sincerely,

Justin Equina  
Associate Planner

ec: Kerwin Lau, Manager of Planning Services  
Lisa Thai, Supervising Transportation Analyst

MAYOR  
Miguel A. Pulido  
MAYOR PRO TEM  
Juan Villegas  
COUNCILMEMBERS  
Cecilia Iglesias  
David Penaloza  
Vicente Sarmiento  
Jose Solorio



CITY MANAGER  
Kristine Ridge  
CITY ATTORNEY  
Sonia R. Carvalho  
ACTING CLERK OF THE COUNCIL  
Norma Mitre-Ramirez

## CITY OF SANTA ANA

### Planning and Building Agency

20 Civic Center Plaza • P.O. Box 1988  
Santa Ana, California 92702  
[www.santa-ana.org](http://www.santa-ana.org)

June 21, 2019

Delivered via email to: [minoo.ashabi@costamesa.gov](mailto:minoo.ashabi@costamesa.gov)

City of Costa Mesa  
Minoo Ashabi, Principal Planner  
Development Services Department  
77 Fair Drive  
Costa Mesa, CA 92626

RE: Notice of Preparation of an Environmental Impact Report for the One Metro West Project

Dear Ms. Ashabi,

The City of Santa Ana has received the Notice of Preparation for the One Metro West Project. The following project description is stated in the Notice of Preparation: up to 1,057 multi-family dwelling units, 25,000 square feet of commercial creative office, 6,000 square feet of specialty retail and 1.7 acres of open space on a 15.6-acre project site.

The City of Santa Ana is requesting the following intersections be included as part of the Traffic Impact Study for the project:

- Harbor Boulevard & Segerstrom Avenue
- Harbor Boulevard & MacArthur Boulevard
- MacArthur Boulevard & Hyland Avenue
- MacArthur Boulevard and Fairview Street

Please add Associate Planner, Selena Kelaher [Skelaher@santa-ana.org](mailto:Skelaher@santa-ana.org) and Senior Engineer, Zed Kekula [ZKekula@santa-ana.org](mailto:ZKekula@santa-ana.org) to the notification list for the project and for the notice of availability.

Thank you,

Selena Kelaher  
Associate Planner, AICP

#### SANTA ANA CITY COUNCIL

Miguel A. Pulido  
Mayor  
[mpulido@santa-ana.org](mailto:mpulido@santa-ana.org)

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Ward 4

Cecilia Iglesias  
Ward 6  
[ciglesias@santa-ana.org](mailto:ciglesias@santa-ana.org)



June 20, 2019

NCL-19-021

Minoo Ashabi, Principal Planner  
Development Services Department  
City of Costa Mesa  
77 Fair Drive  
Costa Mesa, CA 92626

**Subject:** Notice of Preparation of an Environmental Impact Report for the One Metro West Project.

Dear Ms. Minoo Ashabi:

Thank you for the opportunity to comment on the NOP for an Environmental Impact Report for the One Metro West Project the County of Orange offers the following comments for your consideration.

**OC Infrastructure Programs /Flood Programs/Hydrology**

1. The Draft EIR for the proposed project must clearly identify the possible impacts to OCFCD facilities. Santa Ana River Channel (Facility No. E01), and Greenville Banning Channel (Facility No. D03) are in the vicinity of the subject project. Drainage Facility Base maps that depict existing local and regional drainage facilities and as-built drawings of facilities owned by the Orange County Flood Control District are available for review at <http://ocflood.com/docs/drawings>.
2. Please be advised that the Greenville Banning channel contains deficient reaches that are not capable of conveying runoff from a 100-year storm event. The potential development sites should not worsen existing conditions or shift flooding problems upstream or downstream of proposed developments. Appropriate mitigation measures should be provided to address adverse impacts, and minimize increased runoff resulting from the project.
3. The hydrology and hydraulic impacts resulting from the project must be assessed. Analyses of possible impacts to the existing OCFCD facilities and appropriate mitigation measures should be conducted in consultation with OC Public Works/OC Infrastructure Programs. The analyses must be consistent with the prevailing criteria of the Orange County Hydrology Manual (OCHM), Addendum No. 1 to the OCHM, Orange County Flood Control Design Manual, Orange County Local Drainage Manual, and other related design criteria.
4. Since the City of Costa Mesa is responsible for land use planning and development within its municipal limits, the City should review and approve all local hydrology and hydraulic analyses. The project proponent should ensure that the proposed development is adequately protected from flooding in a 100-year storm event.

5. The City of Costa Mesa, as floodplain administrator, should ensure that floodplains are properly identified and that structures are located outside the FEMA 100-year floodplain, or designed in conformance with local floodplain ordinances, and Federal Emergency Management Agency (FEMA) regulations.
6. All work within or adjacent to any OCFCD right-of-way or flood control facilities shall be conducted so as not to adversely impact channel's structural integrity, hydraulic flow conditions, access and maintainability. Furthermore, all proposed projects within OCFCD right-of-way should be reviewed and approved by OC Public Works, and the work should be conducted only after an encroachment permit has been obtained. For information regarding the permit application process and other details please refer to the Encroachment Permits Section link on OC Public Works website: [http://www.ocpublicworks.com/ds/permits/encroachment\\_permits](http://www.ocpublicworks.com/ds/permits/encroachment_permits). Technical reviews and approvals for the proposed work will be accomplished within the permit process.

If you have any questions regarding these comments, please contact Sahar Parsi at (714) 647-3988 or Penny Lew at (714) 647-3990 in OC Infrastructure Programs or Cindy Salazar at (714) 667-8870 in OC Development Services.

Sincerely,



Richard Vuong, Manager, Planning Division  
OC Public Works Service Area/OC Development Services  
300 North Flower Street  
Santa Ana, California 92702-4048  
[Richard.Vuong@ocpw.ocgov.com](mailto:Richard.Vuong@ocpw.ocgov.com)

cc: Sahar Parsi, OC Flood Programs/Hydrology & Floodplain Management  
Penny Lew, OC Flood Programs/Hydrology & Floodplain Management



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630



**Gavin Newsom**  
Governor

**Governor's Office of Planning & Research**

June 13, 2019

**JUNE 14 2019**

### **STATE CLEARINGHOUSE**

Ms. Minoo Ashabi  
Principal Planner  
City of Costa Mesa  
77 Fair Drive  
Costa Mesa, California 92626

NOTICE OF PREPARATION FOR ENVIRONMENTAL IMPACT REPORT,  
ONE METRO WEST PROJECT, COSTA MESA (SCH# 2019050014)

Dear Ms.Ashabi:

The Department of Toxic Substances Control (DTSC) has received the submitted Notice of Preparation (NOP) for the above-mentioned project. The project proposes a mixed-use development that consists of residential, commercial and recreational uses.

The NOP states that the demolition of the existing buildings may result in exposure of hazardous materials including asbestos, lead paint and other hazardous materials. In addition to the lead-based paint and asbestos containing materials, DTSC recommends the following comments be addressed in the Environmental Impact Report, Hazards and Hazardous Materials impact analysis:

1. The EIR should also discuss removal of polychlorinated biphenyl (PCB) caulk in building materials.
2. In addition to the current use of the site by Sakura Paper Inc., the EIR should identify and determine whether historic uses at the project site may have resulted in any release of hazardous wastes/substances.
3. The EIR should identify any known or potentially contaminated sites within the proposed project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment.

Ms. Minoo Ashabi

June 13, 2019

Page 2

4. If hazardous materials or wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. All environmental investigations, sampling and/or remediation for the site should be conducted under a workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup.

DTSC appreciates the opportunity to review the draft Focused Environmental Impact report. Should you need any assistance in environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at:

<https://dtsc.ca.gov/brownfields/voluntary-agreements-quick-reference-guide/>.

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by e-mail at [chiarin.yen@dtsc.ca.gov](mailto:chiarin.yen@dtsc.ca.gov).

Sincerely,



Chia Rin Yen

Environmental Scientist

Brownfields Restoration and School Evaluation Branch

Site Mitigation and Restoration Program

mv/cy/yg

cc: (via e-mail)

Governor's Office of Planning and Research

State Clearinghouse

[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

Mr. Dave Kereazis

Office of Planning & Environmental Analysis

Department of Toxic Substances Control

[dave.kereazis@dtsc.ca.gov](mailto:dave.kereazis@dtsc.ca.gov)

Ms. Yolanda Garza

Brownfields Restoration and School Evaluation Branch

Site Mitigation and Restoration Program

[yolanda.garza@dtsc.ca.gov](mailto:yolanda.garza@dtsc.ca.gov)



## CITY OF FOUNTAIN VALLEY

---

### PLANNING DEPARTMENT

10200 SLATER AVENUE • FOUNTAIN VALLEY, CA 92708-4736 • (714) 593-4425, FAX: (714) 593-4525

June 14, 2019

Minoo Ashabi, Principal Planner  
City of Costa Mesa Development Services Department  
77 Fair Drive  
Costa Mesa, CA 92626

SUBJECT: Notice of Preparation (NOP) – One Metro West Environmental Impact Report (EIR)

Dear Ms. Ashabi:

Thank you for the opportunity to review and comment on the NOP for the One Metro West EIR. Our understanding is that the project includes a mixed-use development that consists of up to 1,057 residential dwelling units, 6,000 square feet of specialty retail, 25,000 square feet of commercial creative office, and 1.7-acres of open space.

Following our review of the NOP, the City of Fountain Valley has the following comments at this time. Please analyze the following in your preparation of the Environmental Impact Report for this project.

1. The City of Fountain Valley is concerned with traffic impacts the project will have on Fountain Valley roadways in the area around the project. Please address the traffic impacts this project will have on Talbert Avenue, Newhope Street, Euclid Street, Ellis Avenue, and the North and Southbound off-ramps of the I-405 off ramp at Euclid Street. Also, please include the future signal at Mt. Washington Street and Talbert Avenue in your analysis.

Once again, thank you for the opportunity to review the NOP for the One Metro West EIR. Should you have any questions about our comments, please don't hesitate to me at (714) 593-4431 or email at [steven.ayers@fountainvalley.org](mailto:steven.ayers@fountainvalley.org).

Sincerely,

Steven Ayers  
Planner

NATIVE AMERICAN HERITAGE COMMISSION  
Cultural and Environmental Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691 Phone (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Website: <http://www.nahc.ca.gov>  
Twitter: @CA\_NAHC



Governor's Office of Planning & Research

June 10, 2019

STATE CLEARINGHOUSE

June 7, 2019

Minoo Ashabi  
City of Costa Mesa  
77 Fair Drive  
Costa Mesa, CA 92626

RE: SCH# 2019050014 One Metro West, Orange County

Dear Mr. Ashabi:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
  
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
  
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
  
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
  
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: [Steven.Quinn@nahc.ca.gov](mailto:Steven.Quinn@nahc.ca.gov).

Sincerely,



for

Steven Quinn  
Associate Governmental Program Analyst

cc: State Clearinghouse



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June 18, 2019

Ms. Mino Ashabi  
Principal Planner  
City of Costa Mesa  
Development Services Department  
77 Fair Drive  
Costa Mesa, CA 92626

**Subject: One Metro West Notice of Preparation of an Environmental Impact Report**

Dear Ms. Ashabi:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Notice of Preparation of an Environmental Impact Report for One Metro West (Project). The following active transportation comments are provided for your consideration:

- Please consider opportunities to enhance connections for bicycle and pedestrian travel between the project site and Sunflower Avenue to the Santa Ana River Trail
- Please consider opportunities to maintain and potentially enhance the on-street bike lanes on Sunflower Avenue adjacent to the project site

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at [dphu@octa.net](mailto:dphu@octa.net).

Sincerely,

Dan Phu  
Manager, Environmental Programs

CHIEF EXECUTIVE OFFICE

Darrell E. Johnson  
Chief Executive Officer



SOUTHERN CALIFORNIA  
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**Cheryl Viegas-Walker, El Centro**

June 20, 2019

Ms. Minoo Ashabi, Principal Planner  
City of Costa Mesa, Development Services Department  
77 Fair Drive  
Costa Mesa, California 92626  
Phone: (714) 754-5245  
E-mail: [minoo.ashabi@costamesaca.gov](mailto:minoo.ashabi@costamesaca.gov)

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the One Metro West Project [SCAG NO. IGR9923]**

Dear Ms. Ashabi,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the One Metro West Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the One Metro West Project in Orange County. The proposed project includes a mixed-use development of up to 1,057 multi-family dwelling units (anticipated to be rental units), 25,000 square feet (sf) of commercial creative office, 6,000 sf of specialty retail, and 1.7 acres of open space on a 15.6-acre project site.

**When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to [au@scag.ca.gov](mailto:au@scag.ca.gov) providing, at a minimum, the full public comment period for review.**

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or [au@scag.ca.gov](mailto:au@scag.ca.gov). Thank you.

Sincerely,

Ping Chang  
Manager, Compliance and Performance Monitoring

<sup>1</sup> Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
ONE METRO WEST PROJECT [SCAG NO. IGR9923]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

**2016 RTP/SCS GOALS**

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

<b>SCAG 2016 RTP/SCS GOALS</b>	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
<small>*SCAG does not yet have an agreed-upon security performance measure.</small>	

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

**2016 RTP/SCS STRATEGIES**

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

**DEMOGRAPHICS AND GROWTH FORECASTS**

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Costa Mesa Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	113,900	116,500	116,400
Households	6,458,000	7,325,000	7,412,300	41,300	42,200	42,500
Employment	8,414,000	9,441,000	9,871,500	89,600	92,700	93,200

**MITIGATION MEASURES**

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG’s Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA USPS AND E-MAIL:

June 11, 2019

[minoo.ashabi@costamesaca.gov](mailto:minoo.ashabi@costamesaca.gov)

Minoo Ashabi, Principal Planner

City of Costa Mesa, Development Services Department

77 Fair Drive

Costa Mesa, CA 92626

## **Notice of Preparation of an Environmental Impact Report for One Metro West Project**

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air

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<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

#### Mobile Source Health Risk Assessment

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways and other sources of air pollution, South Coast AQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse health risk impacts using its best efforts to find out and a good-faith effort at full disclosure in the CEQA document. Based on a review of aerial photographs and Figure 2, *Local Vicinity*, in the Notice of Preparation, South Coast AQMD staff found that the Proposed Project will be located in proximity to Interstate 405 (I-405). Because of the proximity to the existing freeway and a potential source of air pollution, residents at the Proposed Project<sup>2</sup> would be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and a carcinogen. Diesel particulate matter emitted from diesel powered engines (such as trucks) has been classified by the state as a toxic air contaminant and a carcinogen. Since future residences at the Proposed Project would be exposed to toxic emissions from the nearby sources of air pollution (e.g., diesel fueled highway vehicles and locomotives), South Coast AQMD staff recommends that the Lead Agency conduct a health risk assessment (HRA)<sup>3</sup> to disclose the potential health risks to the residents in the EIR<sup>4</sup>.

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<sup>2</sup>According to the Project Description in the Notice of Preparation, the Proposed Project would include, among others, construction of 302 residential units on 2.9 acres.

<sup>3</sup> South Coast Air Quality Management District. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>4</sup> South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold

### Guidance Regarding Residences Sited Near a High-Volume Freeway or Other Sources of Air Pollution

South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the South Coast AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. South Coast AQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on South Coast AQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance<sup>5</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

### Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of South Coast AQMD's CEQA Air Quality Handbook
- South Coast AQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- California Air Pollution Control Officers Association (CAPCOA)'s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

As stated above, the Proposed Project is located in proximity to I-405. Many strategies are available to reduce exposure, including, but are not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Because of the potential

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of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

<sup>5</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

adverse health risks involved with siting sensitive receptors near freeways and sources of air pollution, it is essential that any proposed strategy must be carefully evaluated before implementation.

In the event that enhanced filtration units are installed at the Proposed Project either as a mitigation measure or project design feature requirement, South Coast AQMD staff recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that South Coast AQMD conducted to investigate filters<sup>6</sup>, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to toxic emissions.

Additionally, after enhanced filtration units are installed at the Proposed Project, and to ensure they are enforceable throughout the lifetime of the Proposed Project as well as effective in reducing exposures to DPM emissions, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular maintenance of filters in the EIR. To facilitate a good faith effort at full disclosure and provide useful information to future residents who will live and/or work at the Proposed Project, the EIR should include the following information, at a minimum:

- Disclosure on potential health impacts to prospective residents from living and/or working in proximity to freeways, and the reduced effectiveness of air filtration system when windows are open and when tenants are outdoor;
- Identification of the responsible implementing and enforcement agency such as the Lead Agency for ensuring that enhanced filters are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identification of the responsible implementing and enforcement agency such as the Lead Agency's building and safety inspection unit to provide periodic, regular inspection on filters;
- Provide information and guidance to the Project developer or proponent on the importance of filter installation and ongoing maintenance;
- Provide information to residents about where the MERV filters can be purchased;
- Disclosure on increased costs for purchasing enhanced filtration systems to prospective residents;
- Disclosure on increased energy costs for running the HVAC system with MERV filters to prospective residents;
- Disclosure on recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units to prospective residents;
- Identification of the responsible entity such as residents, tenants, Homeowner's Association (HOA) or property management to ensure filters are replaced on time, if appropriate and feasible;
- Develop ongoing cost sharing strategies between the HOA and residents/tenants, if available, for replacing the enhanced filtration units;
- Set up criteria for assessing progress in installing and replacing the enhanced filtration units; and

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<sup>6</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

- Set up process for evaluating the effectiveness of the enhanced filtration units at the Proposed Project.

### **Alternatives**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits**

In the event that the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit South Coast AQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385.

### **Data Sources**

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at South Coast AQMD’s webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

ORC190604-04

Control Number



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

**Notice of Preparation**

May 23, 2019

To: Reviewing Agencies  
Re: One Metro West  
SCH# 2019050014

Attached for your review and comment is the Notice of Preparation (NOP) for the One Metro West draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Minoo Ashabi**  
**Costa Mesa, City of**  
**77 Fair Drive**  
**Costa Mesa, CA 92626**

with a copy to the State Clearinghouse in the Office of Planning and Research at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov). Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019050014/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

cc: Lead Agency



**Mike Campisi**  
Pipeline Planning Assistant

9400 Oakdale Ave  
Chatsworth, CA 91311

Tel: 213-231-6081

*June 10, 2019*

Minoo Ashabi  
City of Costa Mesa  
minoo.ashabi@costamesaca.gov

**Subject: One Metro West Project**

**DCF: 1212-19NC**

The Transmission Department of SoCalGas does not operate any facilities within your proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within your project scope.

To assure no conflict with the Distribution's pipeline system, please e-mail them at:

[AtlasRequests/WillServeAnaheim@semprautilities.com](mailto:AtlasRequests/WillServeAnaheim@semprautilities.com)

Sincerely,

**Mike Campisi**  
**Pipeline Planning Assistant**  
**SoCalGas Transmission Technical Services**  
[SoCalGasTransmissionUtilityRequest@semprautilities.com](mailto:SoCalGasTransmissionUtilityRequest@semprautilities.com)

*June 10, 2019*

**1 of 1**

# RINCON BAND OF LUISEÑO INDIANS

## Cultural Resources Department

One Government Center Lane · Valley Center, California 92082 ·  
(760) 297-2330 Fax:(760) 297-2339



May 28, 2019

City of Costa Mesa  
Development Services Department  
77 Fair Drive  
Costa Mesa, CA 92626

### Re: One Metro West Project

Dear Minoo Ashabi:

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the above mention project. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

A handwritten signature in black ink, appearing to read "Destiny Colocho".

Destiny Colocho, RPA  
Tribal Historic Preservation Officer  
Rincon Cultural Resources Department

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Bo Mazzetti  
Tribal Chairman

Tishmall Turner  
Vice Chairwoman

Steve Stallings  
Council Member

Laurie E. Gonzalez  
Council Member

Alfonso Kolb  
Council Member



*Via Electronic Mail*

June 20, 2019

Minoo Ashabi  
Principal Planner  
City of Costa Mesa  
Development Services Department  
77 Fair Drive  
Costa Mesa, CA 92626  
[minoo.ashabi@costamesaca.gov](mailto:minoo.ashabi@costamesaca.gov)

**Re: Earthjustice Comments on the Notice of Preparation of a Draft Environmental Impact Report for the One Metro West Development Project**

Earthjustice appreciates the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report (“DEIR”) for the One Metro West Development Project (“Project”), which contemplates the development of 1,057 dwelling units, 25,000 square feet of commercial creative office, 6,000 square feet of specialty retail, and 1.7-acres of open space. Our initial comments focus on the importance of incorporating building electrification requirements into the Project. The transition from gas to electric buildings is critical to reaching a zero emissions future and will not occur at the scale or timing needed absent decisive City leadership. Consistent with California Environmental Quality Act (“CEQA”) requirements to adopt all feasible mitigation to reduce significant greenhouse gas (“GHG”) and energy impacts, building electrification is essential mitigation to reduce Project impacts and take meaningful action to address climate change. Building electrification will also provide economic, safety, and air quality benefits for the City of Costa Mesa. We therefore urge the City to require all-electric construction as feasible mitigation in the DEIR for the Project.

**I. The Plan Will Have Significant GHG Impacts.**

CEQA requires a DEIR identify all the significant impacts of a proposed project, including from the project’s GHG emissions and energy use.<sup>1</sup> To determine the significance of the Plan’s GHG impacts, the City should apply a net-zero emissions threshold. A net-zero threshold is also consistent with the severity of the climate crisis and the recognition that any increase in GHG emissions exacerbates the cumulative impacts of climate.

In determining the significance of project impacts, the City “must ensure that CEQA analysis stays in step with evolving scientific knowledge and state regulatory schemes.” *Cleveland National Forest Foundation v. San Diego Assn. of Gov’ts* (2017) 3 Cal.5<sup>th</sup> 497, 519. Non-zero numeric thresholds, such as the 1,100 MT GHG significance threshold proposed by the Bay Area Air Quality Management District (“BAAQMD”) in 2009 are unlikely to survive legal

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<sup>1</sup> CEQA Guidelines § 15126.2; Appendix F; Appendix G § VII.

scrutiny. The BAAQMD numeric threshold was derived from Assembly Bill (“AB”) 32’s 2020 GHG reduction targets and does not reflect Senate Bill 32’s requirement to reduce GHGs to 40 percent below 1990 levels by 2030 or our increased understanding of the severity of climate impacts California is and will experience.<sup>2</sup> While useful when first recommended ten years ago, it has not kept in step with scientific knowledge and regulatory developments and is no longer supported by substantial evidence.

Alternative approaches to determining the significance of Project GHG impacts, such as using a comparison against “business-as-usual” emissions or a per capita emissions metric, may not withstand legal scrutiny and should not be used to evaluate the Project’s emissions in the DEIR. In *Center for Biological Diversity v. Cal. Dept of Fish & Wildlife* (2015) 62 Cal.4th 204, the California Supreme Court held that determining the significance of project GHG impacts by comparing project emissions with emissions under a business-as-usual scenario derived from statewide emissions reduction goals under AB 32 lacked substantial evidence. For similar reasons, use of statewide per capita emissions metrics to determine the significance of project emissions has also been rejected for the purpose of determining project GHG impacts under CEQA. As the court held in *Golden Door Properties LLC*, because “using a statewide criterion requires substantial evidence and reasoned explanation to close the analytical gap left by the assumption that the ‘level of effort required in one [statewide] context . . . will suffice in the other, a specific land use development.’” *Golden Door Properties LLC v. County of San Diego* (2018) 27 Cal.App.5th 892, 904 (quoting *Center for Biological Diversity*, 62 Cal.4th at 227). While use of a statewide per capita metric to determine the significance of GHG impacts may be useful for a General Plan, which examines collective community emissions of existing and proposed new development, it is not appropriate for projects that only govern new development. Accordingly, the City should apply a net-zero emissions GHG threshold to ensure a legally defensible EIR. Because the Project will result in an increase in GHG emissions, the City should consider its GHG impacts significant.

## **II. The Plan Will Have Significant Energy Impacts if it Requires Gas Connections.**

A key purpose of the evaluation of project energy impacts under CEQA is “decreasing reliance on fossil fuels, such as coal, natural gas and oil.”<sup>3</sup> Addressing energy impacts of proposed projects requires more than mere compliance with Title 24 Building Energy Efficiency Standards.<sup>4</sup> Including gas hook-ups in new projects, and thereby perpetuating reliance on fossil fuels, is contrary to California’s energy objectives and should be considered a significant impact under CEQA. As the California Energy Commission (“CEC”) determined its 2018 Integrated Energy Policy Report (“IEPR”) Update:

New construction projects, retrofitting existing buildings, and replacing appliances and other energy-consuming equipment essentially lock in energy system infrastructure for many years. As a result, each new opportunity for truly impactful investment in energy efficiency and fuel choice is precious. If the

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<sup>2</sup> See BAAQMD, *CEQA Guidelines Update, Proposed Thresholds of Significance* at 10-22 (Dec 7, 2009), <http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en> (explaining methodology for project-level GHG threshold).

<sup>3</sup> CEQA Guidelines, Appendix F, Sec. I.

<sup>4</sup> See *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211.

decisions made for new buildings result in new and continued fossil fuel use, it will be that much more difficult for California to meet its GHG emission reduction goals. Parties planning new construction have the opportunity instead to lock in a zero- or low-carbon emission outcome that will persist for decades.<sup>5</sup>

Accordingly, projects that contain new gas connections, and therefore result in new fossil fuel delivery infrastructure, have significant energy impacts under CEQA.

### **III. Building Electrification is Feasible and Effective Mitigation to Reduce Project GHG and Energy Impacts.**

A lead agency may not lawfully approve a Project where “there are feasible alternatives or feasible mitigation measures available which would substantially lessen [its] significant environmental effects.”<sup>6</sup> Eliminating natural gas use in new buildings is feasible mitigation that will substantially lessen the Project’s GHG and energy impacts. Indeed, building electrification is one of the fastest and most cost-effective ways to achieve the transition to net-zero emissions. In the 2018 IEPR Update, the CEC recognized the “growing consensus that building electrification is the most viable and predictable path to zero-emission buildings . . . due to the availability of off-the-shelf, highly efficient electric technologies (such as heat pumps) and the continued reduction of emission intensities in the electricity sector.”<sup>7</sup>

All-electric developments are being constructed for a range of building types pursuing low or zero emissions objectives and are a feasible mitigation requirement for new development under the Project. Sacramento’s Municipal Utility District has partnered with homebuilders to construct entire neighborhoods that are all-electric, with 400 all-electric homes planned in the next two years alone.<sup>8</sup> Some California developers now exclusively build all-electric homes, and have already deployed a range of affordable, luxury, single- and multi-family housing units all across the state.<sup>9</sup> Given that other entities are now requiring all-electric construction, there is no reason for the City not to also do so. For example, the University of California announced in August of 2018 that “[n]o new UC buildings or major renovations after June 2019, except in special circumstances, will use on-site fossil fuel combustion, such as natural gas, for space and water heating.”<sup>10</sup>

Similarly, in its Downtown Specific Plan, the City of Hayward required for multifamily residential developments that “[a]ll buildings will be all electric, meaning that electricity is the only permanent source of energy for water-heating, mechanical and heating, ventilation, and air

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<sup>5</sup> CEC, *2018 Integrated Energy Policy Report Update, Vol. II* at 18 (Jan. 2019), <https://efiling.energy.ca.gov/getdocument.aspx?tn=226392>

<sup>6</sup> Pub. Res. Code § 21002.

<sup>7</sup> CEC, *2018 Integrated Energy Policy Report Update, Vol. II* at 20 (Jan. 2019), <https://efiling.energy.ca.gov/getdocument.aspx?tn=226392>.

<sup>8</sup> Justin Gerdes, *All-Electric Homes Are Becoming the Default for New Residential Construction in Sacramento*, Greentech Media (Nov. 13, 2018), <https://www.greentechmedia.com/articles/read/all-electric-homes-are-becoming-the-default-for-new-residential-construction#gs.VYzCCMQ>.

<sup>9</sup> See Redwood Energy, *Development Projects (A Small Sample)*, <https://www.redwoodenergy.tech/development-projects/>.

<sup>10</sup> University of California, *UC sets higher standards, greater goals for sustainability* (Sept. 4, 2018), <https://www.universityofcalifornia.edu/press-room/uc-sets-higher-standards-greater-goals-sustainability>.

conditioning (HVAC) (i.e., space-heating and space cooling), cooking, and clothes-drying and there is no gas meter connection.”<sup>11</sup> The natural next step is to extend such a requirement to commercial developments, which can also be feasibly electrified.<sup>12</sup>

#### **IV. There Are Multiple Co-Benefits to Achieving Zero Emission Buildings through Electrification.**

Beyond achieving the energy and GHG emissions reductions essential for preventing climate breakdown, electrification of new buildings will produce a range of important co-benefits for the economic well-being, safety, and health of the community. Building electrification offers the potential to lower energy bills, reduce the cost of new construction, improve air quality, public safety, and climate resiliency, as well as create new jobs. Far from being a barrier to new housing, all-electric new construction can enable greater opportunities for affordable housing construction by reducing costs and streamlining mitigation requirements. For disadvantaged populations that pay a disproportionate amount of their income to energy costs, and who are more likely to suffer from asthma due to poor indoor air quality, zero emission homes are an important opportunity to deliver social equity.<sup>13</sup>

##### **A. Lowering Energy Bills and Cost of New Construction**

All-electric buildings can lower utility bills for tenants, reduce the cost of construction of new housing in the City, and shield customers from the volatile and increasing costs of gas. A recent report, *Decarbonization of Heating Energy Use in California Buildings*, by Synapse Energy Economics found that electrification could lower utility bills by up to \$800 annually and lower the cost of new construction in Los Angeles by roughly \$1,500 to \$6,000.<sup>14</sup> Other analysis has found that new homes and apartment buildings can cost between \$1,000 and \$18,000 less to build if they are not connected to gas distribution pipelines.<sup>15</sup> The UC has carefully examined feasibility and costs of all-electric buildings in the report: UC Carbon Neutral Buildings Cost Study. The first key insight offered is that “[a]ll-electric buildings are comparable or slightly less expensive than gas + electric buildings from a 20-year Life Cycle Cost perspective.”<sup>16</sup> The most significant cost savings were found for residential buildings, where the average Life Cycle Cost for all-electric was \$5.28/sf lower compared to gas + electric options.<sup>17</sup>

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<sup>11</sup> City of Hayward, *Hayward Downtown Specific Plan DEIR, Greenhouse Gas Emissions Chapter* at 4.6-40 (Jan. 7, 2019), <https://www.hayward-ca.gov/sites/default/files/documents/dtsp-eir-greenhouse-gas-emissions.pdf>.

<sup>12</sup> See, e.g., Redwood Energy, *Zero Carbon Commercial Construction: An Electrification Guide for Large Commercial Buildings and Campuses* (2019), [https://drive.google.com/file/d/1L5IBsSmT-p8he6dmrW56516ZB\\_dkXya9/view](https://drive.google.com/file/d/1L5IBsSmT-p8he6dmrW56516ZB_dkXya9/view).

<sup>13</sup> Kelly Vaughn, *Social Equity, Affordable Housing, and the Net-Zero Energy Opportunity*, Rocky Mountain Institute (May 9, 2018), <https://rmi.org/social-equity-affordable-housing-and-the-net-zero-energy-opportunity/>.

<sup>14</sup> Synapse Energy Economics, *Decarbonization of Heating Energy Use in California Buildings* at 2, 39 (Oct. 2018), <http://www.synapse-energy.com/sites/default/files/Decarbonization-Heating-CA-Buildings-17-092-1.pdf>.

<sup>15</sup> Stone Energy Associates, *Accounting for Cost of Gas Infrastructure*, CEC Docket 17-BTSD-01 (May 4, 2017), <https://efiling.energy.ca.gov/GetDocument.aspx?tn=217420&DocumentContentId=26959>.

<sup>16</sup> Point Energy Innovations, *UC Carbon Neutral Buildings Cost Study* at 3 (June 2017), <https://www.ucop.edu/sustainability/files/Carbon%20Neutral%20New%20Building%20Cost%20Study%20FinalReport.pdf>.

<sup>17</sup> *Id.*

## B. A Safer Community

Recent events from Aliso Canyon, San Bruno, and the state of Massachusetts add to the devastating record of hazardous natural gas infrastructure. Between 2015 and 2017, natural gas pipeline explosions and incidents in the country claimed on average 15 fatalities, 57 injuries, and \$316,647,907 in property damage *annually*.<sup>18</sup> As climate impacts intensify, the escalating risks of aging natural gas infrastructure will outpace the industry's rate of pipeline replacement. Sea level rise, which promises to be one of the many significant climate impacts affecting the region, especially amplifies the risks of natural gas.<sup>19</sup>

Methane leakage, a pervasive problem with natural gas infrastructure, can be particularly hazardous for families living in earthquake and fire-prone areas since leaking gas exacerbates fires after earthquakes. The California Seismic Safety Commission estimates that 20 to 50 percent of total post-earthquake fires are fires related to gas leaks.<sup>20</sup> Beginning to electrify entire communities is a key precautionary strategy to mitigate the growing risks of California's massive gas system.

## C. Improved Air Quality

Gas appliances in buildings make up a quarter of California's nitrogen oxide (NO<sub>x</sub>) emissions from natural gas. NO<sub>x</sub> is a precursor to ozone and a key pollutant to curb in order to comply with state and federal ambient air quality standards. Electrifying buildings will help the City to reduce NO<sub>x</sub> and ground level ozone, improving *outdoor* air quality and benefiting public health. Electrification of fossil fuel appliances will also immediately improve *indoor* air quality and health. On average, Californians spend 68 percent of their time indoors, making indoor air quality a key determinant of human health.<sup>21</sup> The combustion of gas in household appliances produces harmful indoor air pollution, specifically nitrogen dioxide, carbon monoxide, nitric oxide, formaldehyde, acetaldehyde, and ultrafine particles.<sup>22</sup> The California Air Resources Board warns that "cooking emissions, especially from gas stoves, have been associated with

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<sup>18</sup> Pipeline and Hazardous Materials Safety Administration, *Pipeline Incident 20 Year Trends* (Nov. 2018), <https://www.phmsa.dot.gov/data-and-statistics/pipeline/pipeline-incident-20-year-trends>.

<sup>19</sup> Radke *et al.*, *Assessment of California's Natural Gas Pipeline Vulnerability to Climate Change*, University of California, Berkeley (2016), <https://www.energy.ca.gov/2017publications/CEC-500-2017-008/CEC-500-2017-008.pdf>.

<sup>20</sup> California Seismic Safety Commission, *Improving Natural Gas Safety in Earthquakes* at 1 (adopted July 11, 2002), [http://ssc.ca.gov/forms\\_pubs/cssc\\_2002-03\\_natural\\_gas\\_safety.pdf](http://ssc.ca.gov/forms_pubs/cssc_2002-03_natural_gas_safety.pdf).

<sup>21</sup> Klepeis *et al.*, *The National Human Activity Pattern Survey (NHAPS): A Resource for Assessing Exposure to Environmental Pollutants*, J. EXPO. ANAL. ENVIRON. EPIDEMIOL., Vol. 11(3), 231-52 (2001).

<sup>22</sup> See, e.g., Logue *et al.*, *Pollutant Exposures from Natural Gas Cooking Burners: A Simulation-Based Assessment for Southern California*, ENVIRON. HEALTH PERSP., Vol. 122(1), 43-50 (2014); Victoria Klug & Brett Singer, *Cooking Appliance Use in California Homes—Data Collected from a Web-based Survey*, LAWRENCE BERKELEY NATIONAL LABORATORY (Aug. 2011); John Manuel, *A Healthy Home Environment?* ENVIRON. HEALTH PERSP., Vol. 107(7), 352-57 (1999); Mullen *et al.*, *Impact of Natural Gas Appliances on Pollutant Levels in California Homes*, LAWRENCE BERKELEY NATIONAL LABORATORY (2012).

increased respiratory disease.”<sup>23</sup> Young children and people with asthma are especially vulnerable to indoor air pollution.

#### **D. Pathways to Good, Green Jobs**

Electrification of buildings will enable local workforce development for jobs that will be critical in California’s broader energy transition. Partnering with local organizations and community colleges, the City can foster training and pipeline programs for new jobs in construction, HVAC installation, electrical work, energy efficiency and load management services, as well as manufacturing.

These jobs will rapidly grow in demand as local governments across the state look to rapidly address the emissions from their building sector. In Sacramento Municipal Utility District territory, where all-electric buildings are quickly becoming the default for new developments, demand for specialized plumbers and HVAC technicians is expected to grow enormously. The region expects to install more than 300,000 heat pump space heaters in the next 15 to 20 years.<sup>24</sup>

The next one to five years will be a critical window of opportunity for the City to jump-start this transition away from gas to clean energy buildings. CEQA is an essential vehicle to take all feasible action to reduce GHGs and limit further expansion of gas infrastructure and we urge incorporation of all-electric building design into the Project.

Please contact Matt Vespa at [mvespa@earthjustice.org](mailto:mvespa@earthjustice.org), Sasan Saadat at [ssaadat@earthjustice.org](mailto:ssaadat@earthjustice.org) with any questions or concerns, and please include each of us in future notifications on the Project’s development.

Sincerely,

Matt Vespa  
Staff Attorney  
Earthjustice  
50 California Street, Suite 500  
San Francisco, CA 94111  
[Email: mvespa@earthjustice.org](mailto:mvespa@earthjustice.org)  
Telephone: (415) 217-2123

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Telephone: (415) 217-2104

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<sup>23</sup> California Air Resources Board, *Combustion Pollutants* (last reviewed Jan. 19, 2017), <https://www.arb.ca.gov/research/indoor/combustion.htm>.

<sup>24</sup> Justin Gerdes, *Experts Discuss the Biggest Barriers Holding Back Building Electrification*, Greentech Media (Sept. 19, 2018), <https://www.greentechmedia.com/articles/read/here-are-some-of-the-biggest-barriers-holding-back-building-electrification#gs.fBEBKJy2>.

## HUYNH, NANCY

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**From:** ASHABI, MINOO  
**Sent:** Thursday, May 30, 2019 1:30 PM  
**To:** HUYNH, NANCY; LE, JENNIFER  
**Subject:** FW: Project: One Metro West

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**From:** Amy Mamo <gwomanmamo@gmail.com>  
**Sent:** Thursday, May 30, 2019 12:05 PM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** Project: One Metro West

Please know that my husband and myself are totally against this new proposed project.  
Our streets in North Mesa Verde are already too congested!!!!  
Do not bring more traffic to Costa Mesa PLEASE!!!!

Amy and Maurice Mamo  
1794 New Hampshire Drive  
Costa Mesa, CA92626

## **Bogue, Kristen**

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**From:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Sent:** Thursday, June 20, 2019 4:49 PM  
**To:** HUYNH, NANCY; Bogue, Kristen; 'Brent Stoll'  
**Subject:** EXTERNAL: FW: Comment on One Metro West Notice of Preparation

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**From:** Andrew Nelson <anelson@redoakinv.com>  
**Sent:** Thursday, June 20, 2019 4:03 PM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** Comment on One Metro West Notice of Preparation

To: Minoo Ashabi  
Planning Department  
City of Costa Mesa

Dear Minoo:

We are the developers of Baker Block, the 240-unit apartment community located at 125 Baker Street in Costa Mesa that received Certificate of Occupancy in March of 2018.

As a part of our discretionary approvals in 2014, we were required to build 457 parking stalls, many more than we thought we would need. Sure enough, we are built and fully occupied, and have many empty parking stalls in our building at all hours of the day. We are over-parked.

As you study parking requirements for One Metro West, we would welcome you to consider Baker Block as a data point on current parking demand and use patterns among this demographic. Please let me know if I can be helpful in providing any information in this regard.

Thanks,

**Andrew Nelson**

**Red Oak Investments, LLC**

4199 Campus Drive #200, Irvine CA 92612

949-733-2000 [anelson@redoakinv.com](mailto:anelson@redoakinv.com)



ONE METRO WEST  
NOTICE OF PREPARATION  
COMMENT FORM

NAME: Anna Viska

ADDRESS (OR AGENCY NAME): Orange Avenue, Costa Mesa

COMMENTS:

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

Responses to the NOP must be submitted no later than 5:00 PM on Friday, June 21, 2019 at the Development Services Department located at 77 Fair Drive, 2<sup>nd</sup> Floor, Costa Mesa, CA 92626 (Attn: Minoo Ashabi, Principal Planner).

- 1) Making sure that parking studies are done on realistic numbers so the project is not underparked.
- 2) What a development maxed out to existing zoning would look like? What would ~~parking for~~ traffic for such a project look like? What would traffic for such a project look like?

3) Making sure ~~that~~ traffic studies are based on realistic ~~scenarios~~ scenarios and numbers.

4) Studies on Air Quality for residents. Heavy car use, potential pollution, can the residents keep open windows?

5) Realistic calculation on tax impact - changing industrial/commercial to high density residential. What are impacts to infrastructure and police/fire service?

## HUYNH, NANCY

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**From:** ASHABI, MINOO  
**Sent:** Thursday, May 30, 2019 8:45 AM  
**To:** CURTIS, BARRY C.; LE, JENNIFER; HUYNH, NANCY  
**Subject:** FW: One Metro West Development

**From:** Bill "SurfcityBilly" Partnoff <Billy@surfcitybilly.com>  
**Sent:** Thursday, May 30, 2019 8:12 AM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>; FOLEY, KATRINA <KATRINA.FOLEY@costamesaca.gov>; STEPHENS, JOHN <JOHN.STEPHENS@costamesaca.gov>; CHAVEZ, MANUEL <MANUEL.CHAVEZ@costamesaca.gov>; GENIS, SANDRA <SANDRA.GENIS@costamesaca.gov>; MANSOOR, ALLAN <ALLAN.MANSOOR@costamesaca.gov>; MARR, ANDREA <ANDREA.MARR@costamesaca.gov>; REYNOLDS, ARLIS <ARLIS.REYNOLDS@costamesaca.gov>; HAUSER, JANET <JANET.HAUSER@costamesaca.gov>; CITY COUNCIL <CITYCOUNCIL@costamesaca.gov>  
**Subject:** One Metro West Development

Hello Minoo and Costa Mesa City Council Members,

I am a resident of Mesa Verde North and if this project gets approved AS IS, My/Our community will feel the brunt of the increased traffic around our neighborhood thru Harbor Blvd, 405 FWY, Sunflower Ave, South Coast Ave, MacArthur Blvd (north) and Baker (south).

The "Monster" towers (upwards to 800 feet to 1,000 feet tall) and parking structure will be seen for miles from Newport Coast on the 73 FWY up to Beach Blvd. The light pollution will invade our lives and homes for decades, while the developer who lives in Santa Monica will not feel any of this. The project is listed as providing Affordable Living units which in fact are "ONLY 150 units" will be and with the remaining units (907) being rented upwards to \$3500 PER MONTH! That is not affordable!

This size project is way too large for the infrastructure to handle and MUST be scaled down. Our lives as we know it in Northwest Costa Mesa will be changed for the worst! It is your responsibility and the City Council to "PROTECT" the citizens from "Predators" like this!

I understand the meeting on June 5th will "NOT" be the normal way. There are to be multiple tables to diffuse dissenters by the developer. Please ensure that we as citizens of Costa Mesa are not taken advantaged of by this developer by getting preferred treatment by changing the process.

The developer is pulling all stops to make sure he gets this project approved as is and we as Costa Mesans need to be protected by our elected officials!

--

Respectfully Submitted,

Bill "SurfcityBilly" Partnoff

Broker BRE# 01202846

(714) 271-2647

[www.surfcitybilly.com](http://www.surfcitybilly.com)

SurfcityBilly.com...Leading You into the Future of Real Estate

## Bogue, Kristen

---

**From:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Sent:** Friday, June 21, 2019 11:34 AM  
**To:** HUYNH, NANCY; Bogue, Kristen; 'Brent Stoll'  
**Cc:** CURTIS, BARRY C.; LE, JENNIFER  
**Subject:** EXTERNAL: FW: One Metro West Development EIR SCOPE Meeting

**From:** Bill "SurfcityBilly" Partnoff <Billy@surfcitybilly.com>  
**Sent:** Friday, June 21, 2019 11:05 AM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>; FOLEY, KATRINA <KATRINA.FOLEY@costamesaca.gov>; STEPHENS, JOHN <JOHN.STEPHENS@costamesaca.gov>; CHAVEZ, MANUEL <MANUEL.CHAVEZ@costamesaca.gov>; GENIS, SANDRA <SANDRA.GENIS@costamesaca.gov>; MANSOOR, ALLAN <ALLAN.MANSOOR@costamesaca.gov>; MARR, ANDREA <ANDREA.MARR@costamesaca.gov>; REYNOLDS, ARLIS <ARLIS.REYNOLDS@costamesaca.gov>; HAUSER, JANET <JANET.HAUSER@costamesaca.gov>; CITY COUNCIL <CITYCOUNCIL@costamesaca.gov>  
**Subject:** One Metro West Development EIR SCOPE Meeting

Hello Minoo and Costa Mesa City Council Members,

I am a resident of Mesa Verde North and if this project gets approved AS IS, My/Our community will feel the brunt of the increased traffic around our neighborhood thru Harbor Blvd, 405 FWY, Sunflower Ave, South Coast Ave, MacArthur Blvd (north) and Baker (south).

I attended the initial meeting to set the scope for the EIR for the One Metro West project, and left multiple suggestion cards. I live in the Mesa Verde North, which will be the closest residents to - and the ones most affected by - the Development project. Despite Rose Equities claims they have "been actively engaging with our neighbors and community residents". When Mesa Verde North residents were asked on Nextdoor to see if they had been contacted by either Rose Equities or the city regarding this EIR Scope meeting, the answer was no. Rose Equities had shortly before this meeting distributed bags for a food bank in our area and could easily have enclosed an introduction letter and invitation at that time. Brent Stoll from Rose Equities has been contacted numerous times and he dodges the answer asked why this wasn't done. Again at the EIR Scope meeting Mr. Stoll was asked when we could expect such a letter, as Rose Equities had made a point at the city council meeting of emphasizing their active outreach to the communities in which they build, but he prevaricated. Due to this lack of outreach, this initial meeting included many city staff, consultants, and developers, but almost no residents, which in my opinion was a waste of tax payer dollars. With that as an explanation why you received so few comments at the meeting, these are the issues that most concern residents in the State Streets: The main problem is traffic; there is no way to widen Harbor Blvd. or the on-and off-ramps to the 405 freeway on Harbor. Although this project emphasizes a walkability and bikeability lifestyle - expecting most residents to shop and dine north of the 405 - I doubt all of the 1,045 apartments' residents will walk or bike to work. Also, one to two thousand more cars coming down Harbor to shop or dine will make an already accident-prone area very dangerous. Harbor and Gisler has many accidents due to the multi-lane on-ramps to the freeway and the In-N-Out on the corner. To avoid Harbor, many drivers use Gisler and cut through neighborhood streets resulting in hit-and-run accidents. This is most egregious because children are always in this area walking to the California and Tewinkle schools on Gisler and California. Other problems with the project could include privacy, and light and sound pollution. Depending upon where the 7-story buildings are situated, they could look directly down on homes in Mesa Verde North and the State streets, shining light and reflecting freeway noise down on them and the surrounding area. Because we are directly affected by whatever happens on the other side of the freeway or river channel, we fought off an 7-story EMD flashing billboard in Fountain Valley a few years ago because of

light and privacy intrusion into the Mesa Verde North. As for freeway air and noise pollution, the freeway widening is already adding to that, but it is less problematic when the wind is from the South or West. Another problem is the low-flying helicopters that follow the 405 to Long Beach and LAX, which already make it almost impossible to enjoy time outdoors with a constant roar and window rattling night and day. If this 7-story complex is built, the flights that have stayed to the North over the industrial area would be more inclined to fly directly over our homes, further degrading our quality of life.

The EIR MUST CONTAIN ALL Items that will let everyone see this development in it's "TRUE LIGHT"! Please don't let it be a "Light Version"!

I have lived in this area for almost 10 years and I am not opposed to sensible development. This size project is way too large for the infrastructure to handle and MUST be scaled down. Our lives as we know it in Northwest Costa Mesa will be changed for the worst! It is your responsibility and the City Council MUST "PROTECT" the citizens from "Predators" like this!

Please ensure that we as citizens of Costa Mesa are not taken advantaged of by this developer by getting preferred treatment by changing the process.

The developer is pulling all stops to make sure he gets this project approved as is and we as *Costa Mesans need to be protected by our elected officials!*

--

Respectfully Submitted,

Bill "SurfcityBilly" Partnoff

Broker BRE# 01202846

(714) 271-2647

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**ONE METRO WEST  
NOTICE OF PREPARATION  
COMMENT FORM**

**NAME:** WILLIAM PARINOFF

**ADDRESS (OR AGENCY NAME):** 3321 ALABAMA CIR CM

**COMMENTS:**

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

Responses to the NOP must be submitted no later than 5:00 PM on Friday, June 21, 2019 at the Development Services Department located at 77 Fair Drive, 2<sup>nd</sup> Floor, Costa Mesa, CA 92626 (Attn: Minoo Ashabi, Principal Planner).

THIS PROJECT / DEVELOPMENT IS WAY TOO LARGE,  
NEEDS TO BE DOWNSIZED TO FIT THE  
NEIGHBORHOOD. TOO MUCH LIGHT  
POLLUTION; INCREASED TRAFFIC ON  
HARBOR BLVD; OVERLOADING OF  
INFRASTRUCTURE.

## HUYNH, NANCY

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**From:** ASHABI, MINOO  
**Sent:** Monday, June 03, 2019 8:25 AM  
**To:** HUYNH, NANCY; CURTIS, BARRY C.; LE, JENNIFER  
**Subject:** FW: One Metro West

**From:** bob <bobincm@aol.com>  
**Sent:** Friday, May 31, 2019 4:28 PM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** One Metro West

Mr. Ashabi, I have been a resident of Costa Mesa since 1979. I have lived in my current home since 1984. I pass near the proposed project at 1683 Sunflower on my way to Costco every week. There are only two outlets from the proposed project. They can either use MacArthur or Sunflower. I don't know how those street can handle the additional traffic. North/South, they either will take Harbor or Fairview or go to Fountain Valley and take Euclid. The traffic during the week is going to be a mess. It is already a mess. You can't add that many residences and think that it won't impact what is already a terrible traffic problem. Do you drive on MacArthur in the evening? Do you drive on Harbor Blvd in the evening? You can't expect all of the residents to be in walking distance of their employer. I am going to vote against the project as it makes no sense.

Bob Rasch

**From:** [ASHABI, MINOO](#)  
**To:** [HUYNH, NANCY](#); [LE, JENNIFER](#)  
**Subject:** FW: One Metro West  
**Date:** Thursday, May 30, 2019 2:13:08 PM

---

**From:** Debra Marsteller <Deb@proindependence.org>  
**Sent:** Thursday, May 30, 2019 2:08 PM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** One Metro West

I am writing in support of the mixed use project One Metro West. I live at 3374 California Street. MV North, right across from Moon Park and work at Cambridge Park. I know---lucky to walk to work. We need affordable housing. We need mixed use. Our biggest issue is traffic and affordable housing. we need people with big ideas to address these problems. I hope we can make this happen. Good luck.



Debra Marsteller  
**Project Independence**  
[www.proindependence.org](http://www.proindependence.org)  
714-549-3464 ext 232

Support Your Community  
We're Better Together



## Bogue, Kristen

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**From:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Sent:** Monday, June 24, 2019 8:34 AM  
**To:** HUYNH, NANCY; Bogue, Kristen; 'Brent Stoll'  
**Subject:** EXTERNAL: FW: Environmental Impact Report (EIR) for the One Metro West project

**From:** Jan Harmon <janharmon2008@gmail.com>  
**Sent:** Friday, June 21, 2019 8:19 PM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** Environmental Impact Report (EIR) for the One Metro West project

Dear Sir,

I object to the building of such a large complex as the One Metro West project planned to replace the Robinson Pharma warehouse on Sunflower west of SOCO, across the freeway from Mesa Verde North.

My greatest concern about this project is the amount of traffic that will no doubt be generated. The project's scope of 1057 apartments plus retail and restaurants will definitely increase the traffic on Harbor both to the North and to the South of Sunflower at Harbor and at the on ramps and off ramps of the 405 freeway at both Harbor Blvd and Fairview Rd. Currently, the amount of traffic in these area at rush hour is horrendous and the One Metro West project would make the traffic far worse.

My other concern is about the height of the three seven story apartment buildings. There is nothing else this tall in the area and am concerned about both the loss of privacy and impact of lighting for the residents in the "states streets" area directly across the freeway from the One Metro West proposal.

I am also concerned that no one that I have talked to in the Mesa Verde area has heard about this project. It feels like the concerns residents are being left out of the process.

Sincerely,  
Jan Harmon  
1859 Illinois St  
Costa Mesa CA 92626  
(714)546 4005



**ONE METRO WEST  
NOTICE OF PREPARATION  
COMMENT FORM**

NAME: JASON THEBING

ADDRESS (OR AGENCY NAME): 1808 IOWA ST

**COMMENTS:**

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

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THINGS I AM CONCERNED ABOUT -  
1ST VISUAL IMPACT -  
2 - LIGHT POLLUTION ON THE STATE STREETS  
3 - PEDESTRIAN CUT THROUGH TRAFFIC INTO  
THE STATE STREETS & MESA VERDE COUNTRY CLUB  
TO HARBOR & ADAMS



TRAFFIC, CONGESTION, POLLUTION, OVER CROWDING

MY SUGGESTION IS TO KEEP THIS THING

- 1) 4 STORIES MAX
- 2) SHRINK THE SCOPE - IT IS JUST TO BIG!
- 3) LOW TO MEDIUM DENSITY
- 4) MORE OPEN SPACE
- 5) MAYBE DIFFERENT LOCATION - NO CLOSE TO FREEWAY

TO BIG !!!

## Bogue, Kristen

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**From:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Sent:** Monday, June 24, 2019 8:33 AM  
**To:** HUYNH, NANCY; Bogue, Kristen; 'Brent Stoll'  
**Subject:** EXTERNAL: FW: One Metro West

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**From:** Karen Klepack <klk949@yahoo.com>  
**Sent:** Friday, June 21, 2019 7:08 PM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** One Metro West

Minoo,

I live in Mesa Verde (3148 Sicily), and I am writing you in support of One Metro West. We need more housing near jobs that enables people to get out of their cars and reduce long commutes. I feel this project is in a great location for multifamily, with Santa Ana River trail access, SOCO shopping, and nearby jobs.

I do, however, want to ensure that the city of Costa Mesa considers greenhouse gas (GHG) emissions when analyzing this project. Fossil fuels like natural gas have been proven to cause severe health issues, like asthma, heart attack, upper respiratory and eye irritation, cancer, and organ damage. The impacts of climate change also have financial implications for the city, as sea levels rise and the frequency and intensity of storms escalate. I would ask that this project accommodate electric vehicle (EV) charging and have no natural gas connections, to protect the health of our neighbors. Today's electric technologies are more energy efficient than their gas counterparts, and they are powered by clean renewable energy.

Thank you,  
Karen Klepack

## HUYNH, NANCY

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**From:** ASHABI, MINOO  
**Sent:** Monday, June 03, 2019 8:24 AM  
**To:** HUYNH, NANCY; LE, JENNIFER; CURTIS, BARRY C.  
**Subject:** FW: Proposed One Metro West Development

**From:** Fitzkemmer <fitzkemmer@aol.com>  
**Sent:** Friday, May 31, 2019 1:54 PM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** Proposed One Metro West Development

Attn: Minoo Ashabi

Re: Proposed One Metro West Development

This is a ridiculous proposal that is only a benefit to the City of Costa Mesa - looking for more tax money to pay longstanding debts and pensions!

Can you say "Congestion, Over Density, Not proper parking, surrounding infrastructure not designed to handle!!!! Area cannot handle the traffic off the 405 now at Highland? Why would anyone consider such a project - other than looking for financial benefits!!!! The proposed entrance into project off of Sunflower is not sufficient for such a project. The entire area from the 405 - Highland - Sunflower - McAurthur Blvd. would be nothing but a traffic jam.

If your a planner -- Wise UP. The citizens of Costa Mesa don't want to live in gridlock any more than it already is.

Kemmer Fitzsimmons  
[fitzkemmer@aol.com](mailto:fitzkemmer@aol.com)

## HUYNH, NANCY

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**From:** HUYNH, NANCY  
**Sent:** Monday, June 24, 2019 9:03 AM  
**To:** HUYNH, NANCY  
**Subject:** RE: One Metro West

**From:** Ken Rhea <[kjrhea@gmail.com](mailto:kjrhea@gmail.com)>  
**Sent:** Friday, June 21, 2019 4:28 PM  
**To:** ASHABI, MINOO <[MINOO.ASHABI@costamesaca.gov](mailto:MINOO.ASHABI@costamesaca.gov)>  
**Subject:** One Metro West

Dear Ms. Ashabi,

I live on Nebraska Pl and also have a business on Beach Blvd. at the 405. I think that both locations will be negatively affected by this project.

I have lived in my home for 25 years and I have watched Harbor Blvd. be overdeveloped to the point where it can take 25 min. to get from MacArthur Blvd to my home. It's a 7min trip.

Rose Equities has not been a good neighbor, thus far. No information has come to my home about meetings or planning. This does not inspire trust. As a family therapist, I will never be able to make an evening meeting but I intend to share my written opinion. I have corresponded with the city council. I am not opposed to development. I am very opposed to this development. The structures don't fit. The planners are silly if they think that the low-income units they describe will truly be low enough to serve the community. Sacramento is pushing for 'building up'. They are not taking the concerns of my neighborhood and my well being into account. I count on Costa Mesa city government to protect my neighborhood. Letting this project through will be destructive.

Sincerely,

Kenneth J. Rhea, MFT 14233

(714) 775-0777  
Office: 16152 Beach Blvd  
Huntington Beach, CA 92647  
Mailing: 2973 Harbor Blvd. Suite 292  
Costa Mesa, CA 92626

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**ONE METRO WEST  
NOTICE OF PREPARATION  
COMMENT FORM**

NAME: MARY

ADDRESS (OR AGENCY NAME): ORANGE, COSTA MESA

**COMMENTS:**

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

Responses to the NOP must be submitted no later than 5:00 PM on Friday, June 21, 2019 at the Development Services Department located at 77 Fair Drive, 2<sup>nd</sup> Floor, Costa Mesa, CA 92626 (Attn: Minoo Ashabi, Principal Planner).

Great presentation answered many questions - I have an open mind questioning air quality issues, understand technology will take care of some issues - well fresh air not be healthy to breathe. Traffic is always an issue, especially by heavily travelled intersections toward 405. I still have

Concern over impact of homes S of 405  
via privacy, views, lights etc.

The designs are pleasing + very open.

I'll follow this project closely for  
more detailed. stats + plans

Thank you  
Mary.

## Bogue, Kristen

---

**From:** HUYNH, NANCY <NANCY.HUYNH@costamesaca.gov>  
**Sent:** Thursday, June 27, 2019 5:11 PM  
**To:** Brent Stoll (brent@roseequities.com); Bogue, Kristen; ASHABI, MINOO  
**Subject:** EXTERNAL: FW: One Metro West

One more NOP public comment from City Clerk

NANCY HUYNH  
Associate Planner  
Development Services | City of Costa Mesa  
(714) 754-5609



---

**From:** GREEN, BRENDA <brenda.green@costamesaca.gov>  
**Sent:** Thursday, June 27, 2019 5:10 PM  
**To:** HUYNH, NANCY <NANCY.HUYNH@costamesaca.gov>; ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** FW: One Metro West

Hello,  
Received the one below, I did not know what it was for.

*Brenda Green*  
City Clerk  
City of Costa Mesa  
714/754-5221

*E-mail correspondence with the City of Costa Mesa (and attachments, if any) may be subject to the California Public Records Act, and as such may, therefore, be subject to public disclosure unless otherwise exempt under the act. **Note: Using the "Reply All" option may inadvertently result in a Brown Act violation.***

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**From:** Mike Mullen <[harborrealtymike@roadrunner.com](mailto:harborrealtymike@roadrunner.com)>  
**Sent:** Tuesday, June 25, 2019 3:47 PM  
**To:** GREEN, BRENDA <[brenda.green@costamesaca.gov](mailto:brenda.green@costamesaca.gov)>  
**Subject:** One Metro West

Greetings:

As a long time area resident I wanted to take this opportunity to express my support for the proposed project at One Metro West. As everyone knows all of California and especially Orange County has a housing shortage. With such a shortage of buildable land in the Costa Mesa metro area any new housing should be welcomed. This project is well thought out and allows for affordable housing

with added park space too. The O.C. Press development will add up to 3000 jobs and as of right now Costa Mesa does not have close in housing units for those added jobs. The One Metro West project will help immensely with the attempt to satisfy that increased housing demand in a location that will allow residents to walk or bike to work and minimize the traffic effects for commuters.

I support the One Metro West Project!

Kind Regards

Mike Mullen  
1120 Dana Dr.  
Costa Mesa CA 92626

**Received**  
City of Costa Mesa  
Development Services Department

To: Hon. Katrina Foley and  
Members of the City Council  
c/o City of Costa Mesa Planning Department  
77 Fair Drive  
Costa Mesa, CA 92626

JUN 21 2019

From: Noah and Marin Von Blom  
Co-Founders/Co-Owners of Costa Mesa restaurants  
ARC Food and Libations, ARC Pizza and The Guild Club at SoCo

RE: Support of One Metro West

Dear Mayor Foley, Mayor Pro Tem Stephens, Councilmembers Chavez, Genis, Mansoor, Marr, and Reynolds, and City Staff:

We join with many in the Costa Mesa business community in supporting the proposed One Metro West residences North of the 405. The community will bring new energy to the neighborhood around SoCo, where we opened our first restaurant ARC Food and Libations in 2013 as part of The OC Mix. Since then, SoCo has evolved into a destination dining center in Southern California. Many of Southern California's top chefs call SoCo and The OC Mix home, creating a vibrant new culinary capitol in the heart of Orange County.

Owners of One Metro West and their representatives have visited us in our restaurants and have provided us with information about their plans for the new community.

As a business owner and employer at SoCo, we know how important it is that our city continue to attract the best in employers, especially for workers in creative fields. The City of Costa Mesa has approved projects North of the 405 that will be home to such jobs and employers, up to 5,000 of them. We believe many will dine with us and the other small business owners at SoCo.

But without housing, these workers will commute to other areas of Costa Mesa and Orange County. Most of our staff does so today.

By giving these workers and the support jobs they attract the ability to live north of the 405, adjacent to the SOCO shopping district, employers, dining, and all that is offered along Sunflower, the City will protect the daily lives of our many traditional neighborhoods south of the 405

SoCo's already acclaimed community will be enlivened and enriched with One Metro West and the pedestrian and bike friendly environment it offers. As business owners, we believe it will be good for our businesses at SoCo, and great for the quality of life in Costa Mesa.

Our newest restaurant, ARC Butcher & Baker, is in a walkable and bikeable mixed-use community in the Cannery Village area of Newport Beach.

We look forward to the day when our Costa Mesa restaurants will be at the center of a similar pedestrian friendly neighborhood.

**We support One Metro West.**

Sincerely,  
Noah and Marin von Blom

A handwritten signature in blue ink, appearing to be "Noah and Marin von Blom", written in a cursive style. The signature is enclosed within a large, hand-drawn blue oval.

## **Bogue, Kristen**

---

**From:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Sent:** Friday, June 21, 2019 8:35 AM  
**To:** HUYNH, NANCY; Bogue, Kristen; 'Brent Stoll'  
**Subject:** EXTERNAL: FW: EIR for One Metro West

**From:** Priscilla Rocco <dementedgardensprite@gmail.com>  
**Sent:** Friday, June 21, 2019 7:12 AM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** EIR for One Metro West

Dear Ms. Ashabi,

I attended the initial meeting to set the scope for the EIR for the One Metro West project, and left four suggestion cards. I live in the State Streets, which will be the closest residents to - and the ones most affected by - the project. Despite Rose Equities claims they have "been actively engaging with our neighbors and community residents," I found out about this meeting from a small notice in the Daily Pilot. When I queried Mesa Verde North residents on Nextdoor to see if they had been contacted by either Rose Equities or the city regarding this EIR meeting, the answer was no. Rose Equities had shortly before this meeting distributed bags for a food bank in our area and could easily have enclosed an introduction letter and invitation at that time. I contacted Brent Stoll from Rose Equities at a Chamber of Commerce event and asked why this wasn't done. Again at the EIR meeting I asked Mr. Stoll when we could expect such a letter, as Rose Equities had made a point at the city council meeting of emphasizing their active outreach to the communities in which they build, but he prevaricated. Due to this lack of outreach, this initial meeting included many city staff, consultants, and developers, but almost no residents, which in my opinion was a waste of tax payer dollars.

With that as an explanation why you received so few comments at the meeting, these are the issues that most concern residents in the State Streets:

The main problem is traffic; there is no way to widen Harbor Blvd. or the on-and off-ramps to the 405 freeway on Harbor. Although this project emphasizes a walkability and bikeability lifestyle - expecting most residents to shop and dine north of the 405 - I doubt all of the 1,045 apartments' residents will walk or bike to work. Also, one to two thousand more cars coming down Harbor to shop or dine will make an already accident-prone area very dangerous. Harbor and Gisler has many accidents due to the multi-lane on-ramps to the freeway and the In-N-Out on the corner. To avoid Harbor, many drivers use Gisler and cut through neighborhood streets resulting in hit-and-run accidents. This is most egregious because children are always in this area walking to the California and Tewinkle schools on Gisler and California. If, however, the number of very low and low-income units in the complex were increased to 20% or 25%, the number of apartment dwellers walking, biking, and using public transportation would increase, putting less cars on Harbor Blvd.

Other problems with the project could include privacy, and light and sound pollution. Depending upon where the 7-story buildings are situated, they could look directly down on homes on Maryland, Wyoming, and Nevada streets, shining light and reflecting freeway noise down on them and the surrounding area. Because we are directly affected by whatever happens on the other side of the freeway or river channel, we fought off an 8-story flashing billboard in Fountain Valley a few years ago because of light and privacy intrusion into the State Streets. As for freeway air and noise pollution, the freeway widening is already adding to that, but it is less problematic when the wind is from the

South or West. Adding a 7-story sound wall across the freeway will protect the apartment dwellers from noise and air pollution, by reflect all of that directly at us no matter the wind direction.

Another problem is the low-flying helicopters that follow the 405 to Long Beach and LAX, which already make it almost impossible to enjoy time outdoors with a constant roar and window rattling night and day. If this 7-story complex is built, the flights that have stayed to the North over the industrial area would be more inclined to fly directly over our homes, further degrading our quality of life.

I have lived in this area for almost 30 years and I am not opposed to sensible development, so please add these concerns into the scope of your EIR so the residents will have all of the facts before voting on it.

Sincerely,

Priscilla Rocco  
3309 California St.  
Costa Mesa, CA 92626-2012  
(657) 699-9812



**ONE METRO WEST  
NOTICE OF PREPARATION  
COMMENT FORM**

NAME: Priscilla Rocco

ADDRESS (OR AGENCY NAME): 3309 California St.

**COMMENTS:**

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traffic will come South from your  
project to get to shops and restaurants  
on Harbor. This area is grid lock now.  
Cars will cut through neighborhood  
streets to avoid the traffic on Harbor.



**ONE METRO WEST  
NOTICE OF PREPARATION  
COMMENT FORM**

**NAME:** Priscilla Rocco

**ADDRESS (OR AGENCY NAME):** 3309 California St.

**COMMENTS:**

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

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Since helicopters fly low over the freeway,  
will they be moved farther into over  
neighborhoods because of the height  
of this project.



**ONE METRO WEST  
NOTICE OF PREPARATION  
COMMENT FORM**

**NAME:** Priscilla Rocco

**ADDRESS (OR AGENCY NAME):** 3309 California St.

**COMMENTS:**

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

Responses to the NOP must be submitted no later than 5:00 PM on Friday, June 21, 2019 at the Development Services Department located at 77 Fair Drive, 2<sup>nd</sup> Floor, Costa Mesa, CA 92626 (Attn: Minoo Ashabi, Principal Planner).

Traffic on Harbor south of the freeway is impossible now. Since no widening is possible, 1-3 thousand cars will be trying to get on the freeway at Harbor 405 S. It is grid lock now at rush hour, these added cars will not work.



## ONE METRO WEST NOTICE OF PREPARATION COMMENT FORM

NAME: Priscilla Rocco

ADDRESS (OR AGENCY NAME): \_\_\_\_\_

### COMMENTS:

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

Responses to the NOP must be submitted no later than 5:00 PM on Friday, June 21, 2019 at the Development Services Department located at 77 Fair Drive, 2<sup>nd</sup> Floor, Costa Mesa, CA 92626 (Attn: Minoo Ashabi, Principal Planner).

7 story parking structures will protect your project from freeway noise but will bounce freeway noise and pollution onto the houses just across the freeway. The state streets are the closest neighbors to this project and you have not reached out to us.



**ONE METRO WEST  
NOTICE OF PREPARATION  
COMMENT FORM**

NAME: Priscilla Rocco

ADDRESS (OR AGENCY NAME): 3309 California St.

**COMMENTS:**

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

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the state streets ~~are~~ and Hillcrest  
are going to be the most affected  
by this project and Rose Equity.  
has not sent a letter of introduction  
and/or invitations to participate in the  
process, there was no notification of this meeting.

## Bogue, Kristen

---

**From:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Sent:** Thursday, June 20, 2019 2:06 PM  
**To:** HUYNH, NANCY; Bogue, Kristen; 'Brent Stoll'  
**Subject:** EXTERNAL: FW: For a better Costa Mesa

**From:** russell rowlands <mvpolo@hotmail.com>  
**Sent:** Thursday, June 20, 2019 1:20 PM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** For a better Costa Mesa

Mrs. Ashabi,

As a longtime resident of Costa Mesa, I wanted to write you in support of the One Metro West project. We need housing badly in Orange County, especially near jobs. I commend Rose Equities for volunteering to include affordable housing as a part of their project. It looks like an incredible community and I cannot image a better place for this than up in the South Coast Metro area, near all the great area shopping and lifestyle. I really look forward to what a project like this might add to our community.

Thank you.

Russell Rowlands  
2476 Elden Ave, UNIT B  
Costa Mesa



## ONE METRO WEST NOTICE OF PREPARATION COMMENT FORM

NAME: Sandra Genis

ADDRESS (OR AGENCY NAME): \_\_\_\_\_

### COMMENTS:

Please provide your comments/suggestions related to: (1) the scope and content of the EIR and (2) the environmental issues or alternatives to be considered in the EIR. Use the **reverse side** of this comment card, as needed, to provide additional comments.

Responses to the NOP must be submitted no later than 5:00 PM on Friday, June 21, 2019 at the Development Services Department located at 77 Fair Drive, 2<sup>nd</sup> Floor, Costa Mesa, CA 92626 (Attn: Minoo Ashabi, Principal Planner).

The following alternatives:

1. Project redeveloped with green zone uses  
at maximum General Plan Intensity.
2. Project providing minimum 40% on-site  
open space, as required for nearly  
all residential projects in the city.

3. Residential project at no more than 20 units / acre to include at least 10% low income units.
4. Residential project at no more than 40 units / acre to include at least 20% very low income units ~~or~~ or 10% extremely low income units.
5. Office park or similar uses ~~per~~ such as R + D.

~~Imp analysis of~~  
traffic

Air quality and energy analyses must include the demonstrated 10-60% increase in VMT + ADT increases due to use of ridehailing services.

## Bogue, Kristen

---

**From:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Sent:** Monday, June 24, 2019 10:38 AM  
**To:** HUYNH, NANCY; Bogue, Kristen; 'Brent Stoll'  
**Subject:** EXTERNAL: FW: Costa Mesa Housing  
**Attachments:** Homelessness jumps 12% in L.A. County and 16% in the city; officials 'stunned'.pdf

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**From:** Shawn McBride <trinug@yahoo.com>  
**Sent:** Monday, June 24, 2019 10:02 AM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** Costa Mesa Housing

Hello,

I am reaching out to you today in response to an article (attached) I read last week connecting homelessness and housing.

I feel Costa Mesa needs all kinds of housing. Our system is broken and increased homelessness is just one problem that will get worse if not addressed. I have been following the proposed One Metro West project and feel that it can be a step in the right direction for the city.

As a longtime resident of Orange County (I have lived in Costa Mesa for the last 19 years), we need more housing and there is no better place to build up in our city than north of the 405. There are so many jobs up there and if we don't put housing near jobs, our traffic is only going to get worse.

Anyway, thanks for hearing me out. Housing is such an important issue for us and this project would be great for Costa Mesa. Also, I'm excited to see what this area could become. The Press, VANS and One Metro West should mesh well together.

Thank you,

Shawn McBride

1814 Fullerton Ave.

Costa Mesa



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L.A. NOW LOCAL

# Homelessness jumps 12% in L.A. County and 16% in the city; officials 'stunned'

By BENJAMIN ORESKES and DOUG SMITH  
JUN 04, 2019 | 5:50 PM



L.A. Times Today airs Monday through Friday at 7 p.m. and 10 p.m. on Spectrum News 1.

In a hard reality check for Los Angeles County's multibillion-dollar hope of ending homelessness, officials reported Tuesday that the number of people living on the streets, in vehicles and in shelters increased by about

12% over last year.

The annual point-in-time count, delivered to the Board of Supervisors, put the number of homeless people just shy of 59,000 countywide. Within the city of Los Angeles, the number soared to more than 36,000, a 16% increase.

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# L.A. County homeless population jumps



Source: Los Angeles Homeless Services Authority

Los Angeles Times

(Los Angeles Times)

And as in past years, most — about 75% — were living outside, fueling speculation of a growing public health crisis of rats and trash near homeless encampments downtown.

The findings in L.A. follow a string of similarly dire point-in-time counts from across California, as government officials struggle to respond more forcefully to the state's abject lack of affordable housing. The shortage is driving up rental prices, forcing people onto the streets at a rapid pace.

[Scenes from the 2019 Greater Los Angeles Homeless Count »](#)

Sheriff Deputy Sgt. William Kitchin talks with Leah Davalos under an overpass while she was recorded for the 2019 Greater Los Angeles Homeless Count in the City of Commerce. (Genaro Molina / Los Angeles Times)

[RELATED: See LAHSA's presentation on homelessness in LA County »](#)

"At this point of unprecedented wealth in the county of Los Angeles, we are equally confronted with unprecedented poverty manifesting itself in the form of homelessness," Supervisor Mark Ridley-Thomas told The Times.

In a statement, Los Angeles Mayor Eric Garcetti called the increase in homelessness "heartbreaking," but said he was hopeful about the city's recent work to alleviate the crisis, including an investment of \$42 million to

respond to public health concerns and intensify street-based services.

"This work has never been for the faint of heart, and we cannot let a set of difficult numbers discourage us, or weaken our resolve," Garcetti said in a statement to The Times.

But among others in L.A. County, the point-in-time count crushed the optimism from last year's tally, when a modest decrease in homelessness was recorded. The uptick left officials struggling to understand how the tide could have turned so badly in a year when millions of dollars had been spent rolling out new initiatives to move people into shelters and permanent housing.

**RELATED: There's a trash and rodent nightmare in downtown L.A., with plenty of blame to go around**

Funds from the 2017 Measure H sales tax reached full strength last year and expanded homeless services got more people off the street than ever before — a little more than 20,000 into some form of housing, according to the county. Yet the number of people becoming homeless outpaced those historic gains.

"Last year's count, we felt we were trimming in a way that would suggest we were getting our arms around this," Ridley-Thomas said. "And yet this year we are pretty well stunned by this data."

Tuesday's supervisors meeting was packed with homeless and housing advocates, some of whom yelled, "Shame on you!" and "That's an undercount!" when county officials showed the point-in-time count on a large screen.

Board chair Janice Hahn admitted that getting chronically homeless people off the streets seems to be taking longer.

"The residents are seeing more encampments, more people sleeping on the sidewalks in dirty, unhealthy and heartbreaking conditions," she said. "They are frustrated by this problem. We need to give people answers."

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But bracing for what appeared to be difficult years ahead, L.A. city and county officials have backed off their one-time mantra of "ending homelessness," and are fully linking the crisis on the region's streets to a housing crisis that is beyond their control.

Volunteer Barbara Petersmeyer counts homeless during a three-day 2019 Greater Los Angeles Homeless Count last January in Los Angeles. (Dania Maxwell / Los Angeles Times)

"If we don't change the fundamentals of housing affordability, this is going to be a very long road," Peter Lynn, executive director of the Los Angeles Homeless Services Authority said in a briefing with The Times. "If we don't get ahead of affordability, we're going to be very hard pressed to get ahead of homelessness."

At the supervisors meeting, Phil Ansell, the county's lead official on homelessness, noted that, every day last year, 133 homeless people moved into permanent housing, but another 150 people became homeless.

Still, both Lynn and Ridley-Thomas rejected the idea that new programs and resources to address homelessness had not been effective.

"Overall, the service portion of the effort on mental health, substance use, the issue of housing, rent subsidies, those are important and we should stay the course," Ridley-Thomas said. "Where we have to work much harder

is in the area of affordable housing."

Without the flow of new dollars for services, Lynn said, the point-in-time count would have been worse and more closely resembled the dramatic jumps in neighboring Southern California counties and in the San Francisco Bay Area.

Orange County changed the way it conducted its count and recorded a 43% increase from its last count in 2017. Ventura, San Bernardino and Kern counties all reported increases of 20% or more.

Lynn pointed to two vulnerable groups as proof that resources work. Even though nearly 3,000 more veterans were reported homeless last year, there was no noticeable change in the number of homeless veterans on the street. Families experiencing homelessness grew by 8% with nearly 8,000 families being provided homes.

One of the largest increases, however, was among people 18 to 24 years old. Lynn said a 24% jump was partly the result of a change in the methodology of the count. But still, he said, "there was a significant increase, many more unsheltered. We were able to house more youth this year than last year, but this is an overflow population."

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Also exceeding the county average was a 17% spike of the chronically homeless — people with a mental or physical impairment who have been on the street or in shelter for more than a year.

Lynn said the dent made in that population by transitioning nearly 5,000 people into permanent housing was overshadowed by the phenomenon of people "aging in" — those who were counted last year but, at that point, weren't "chronic" because they had only been homeless for less than a year.

The growth of homelessness was also uneven across L.A. County. The Westside experienced the largest increase at 19%, following a year in which its numbers were down by even more. The San Gabriel Valley was close behind with a 17% increase, marking the second consecutive year its homeless population had grown.

Two relative bright spots were Pasadena and Long Beach, which along with Glendale conduct their own counts. Pasadena saw a 20% drop, while Long Beach remained relatively flat with only a 2% increase since 2017.

Long Beach's mayor, Robert Garcia, credited the influx of county and state funds for helping execute a plan to put more people into shelters. But he said that about 52% of the city's homeless population was homeless for the first time. "People need to understand the link between homelessness and housing affordability," he said.

The effects of a sizzling rental market and the soaring cost of living in Los Angeles were palpable at the newly opened temporary shelter in Councilman Gil Cedillo's district near MacArthur Park Lake.

Garcetti committed to opening shelters in every council district, but the results have been slow. Only three have opened. The one in Cedillo's district began serving 28 single women and five families last month.

Anna Gray in her room that she shares with her children, Harold, 9, and Patrick, 5, at a recently opened temporary shelter. (Al Seib / Los Angeles Times)

Inside, Anna Gray watched her two sons Patrick, 5, and Harold, 9, bounce around the spartan room as she recounted her life. Gray had lived in a studio for five years and had fallen behind on the rent. When the landlord wanted to raise it to market rate, she realized she wouldn't be able to afford it.

She has been moving from shelter to shelter ever since.

"At one point I had two jobs, I was working, had a car and still couldn't find housing," Gray said. "Let's be real. I'm a single mom. I have all these struggles in life."

This year's dramatic increase in homelessness has spurred United Way of Greater Los Angeles, the mega nonprofit that provided financial support, volunteers and messaging for the Measure H tax hike and the city's Proposition HHH homeless housing bond, to reevaluate its efforts, President and Chief Executive Elise Buik said. For a decade the agency has zeroed in on homelessness, but now it is looking to broaden its agenda to take on housing.

[RELATED: Rats at the police station, filth on L.A. streets — scenes from the collapse of a city that's lost control](#)

"We haven't focused as much on affordable housing, but we are now," Buik said. "We've got to start getting more affordable housing in the region."

Similarly, nonprofits such as the People Assisting The Homeless, or PATH, which builds affordable housing and runs shelters, have begun to call for change at the state level to help address what's playing out on the street. Los Angeles County needs almost 517,000 more units of affordable rental housing to meet demand, and a renter needs to make \$47.52 per hour, which is more than triple the minimum wage, to pay the median monthly rent of \$2,471, according to a recently released report by the [California Housing Partnership](#).

A recently opened temporary shelter on W. Third Street in Los Angeles is reserved for single women and families. (Al Seib / Los Angeles Times)

"As rent continues to increase and wages remain stagnant, the potential for individuals to fall into homelessness increases," said Joel John Roberts, chief executive of PATH. "To counteract this imbalance, we must continue to invest in solutions like permanent supportive housing and push for legislation in Sacramento."

As head of a city-county bureaucratic agency that was formed primarily as a conduit for homelessness funds and to conduct the annual count, Lynn said he can do little more than react to those root causes.

"We're the safety net of last resort," Lynn said. "I can't fix poverty. I can't fix housing affordability. I can't fix the criminal justice system. I can't fix the foster system. But the poverty rate here is crushing a lot of Angelenos, and the economy that is booming so well is leaving out a large number of people."

*Times staff writers Dakota Smith and Matt Stiles contributed to this report.*



L.A. Times Today airs Monday through Friday at 7 p.m. and 10 p.m. on Spectrum News 1.

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## Benjamin Oreskes



Benjamin Oreskes is a general assignment reporter in the California section. Previously, he wrote the Essential California newsletter. Before coming to The Times in February 2017, Oreskes covered foreign policy at Politico in Washington, D.C. He graduated from Northwestern University, and looks forward to seeing the Wildcats play in the Rose Bowl sometime soon.

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## Doug Smith



Senior writer Doug Smith scouts Los Angeles for the ragged edges where public policy meets real people, combining data analysis and gumshoe reporting to tell L.A. stories through his 45 years of experience covering the city. As past database editor from 2004 through 2015, he hunted down and analyzed data for news and investigative projects. Besides "Grading the Teachers," he contributed to investigations of construction abuse in the community college system and the rising toll of prescription drug overdoses. Smith has been at The Times since 1970, covering local and state government, criminal justice, politics and education. He was the lead writer for Times' coverage of the infamous North Hollywood shootout, winner of a 1997 Pulitzer Prize. Between 2005 and 2008, Smith made five trips to Iraq on loan to our foreign desk.

COMMENTS (244)

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## Bogue, Kristen

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**From:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Sent:** Friday, June 21, 2019 11:33 AM  
**To:** HUYNH, NANCY; Bogue, Kristen; 'Brent Stoll'  
**Subject:** EXTERNAL: FW: Proposed Apartment Buildings - One Metro West

**From:** Sue Bright <grammysbright@gmail.com>  
**Sent:** Friday, June 21, 2019 11:28 AM  
**To:** ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>  
**Subject:** Proposed Apartment Buildings - One Metro West

Dear Ms. Ashabi,

Every rose has its thorns, and in this case, Rose Equities is a particularly thorny bush.

Ever since we heard about the proposed One Metro West project (and may I add, not from the developer), I have looked from our home on Michigan Avenue across the freeway to the SoCo center and to the west where these buildings are slated to be built. Every time I have driven past the proposed site, I have imagined three 7 story buildings towering over the landscape. Every time I sit at the traffic light at Harbor and Gisler, or wait in a long line of cars to slowly merge onto the 405, I wonder about the addition of over 1000 more automobiles just across the freeway and what their impact will be.

Obviously, I am not an expert in these matters, but takes only common sense to realize that a project of this magnitude will greatly and adversely affect this area of our city. 1057 apartments equals from 2000 to 3000 new residents, many of them with more than one car. If, as I have heard, the developer touts the "walkability and bikeability" of this project, I wonder if they have considered that there is nowhere even remotely nearby to walk or bike for groceries, doctors, shopping, haircuts, or any of the myriad of ordinary things that ordinary people need on a weekly basis.

Our family has lived in Mesa Verde since 1972, when my parents purchased the house we now own and hope to bequeath to our children and grandchildren. We have seen tremendous growth in Costa Mesa. We understand the need for more housing and aren't of the mindset "not in my backyard". However, the thought of three 7 story buildings sticking up like a blot on the landscape makes me sick at heart. If apartments are to be built there, it would be so much better if they were limited as to height and number. Please look to Azulon Apartments on Harbor Boulevard for a more appropriate size development.

I realize that at this point you are really asking for input on environmental issues, but all I can say is that if this project goes ahead as proposed, the negative impact on Mesa Verde will be immeasurable in terms of traffic, pollution, noise, and our mental health.

Thank you for allowing me to interrupt your day and express my grave misgivings about this project.

Sue Bright  
3274 Michigan Avenue  
Costa Mesa 92626



February 25, 2019

Honorable Mayor Katrina Foley  
City Council Members  
City Planning and Staff

**RE: Support of One Metro West**

Honorable Mayor Foley, Councilmembers & Staff;

Having been born and raised in Costa Mesa, I have seen and even been a part of some of the positive developments in the City. Because we are a city divided by 3 major freeways, we value the few pedestrian friendly places where we live, work and play. These areas and the neighborhoods we call home are filled with our eclectic character and define the "places we go." For this reason, I believe creation of a pedestrian friendly place such as One Metro West, near jobs and retail, north of the 405, is a good idea.

The desire for residents to live within proximity to work and shopping is becoming more ideal and even a necessity. We see it at our 580 Anton project in North Costa Mesa. For Costa Mesa, this means building housing, especially north of the 405, as a reason new companies will choose our city. By rightsizing One Metro West to keep residents in the area of their neighborhood for dining, shopping, and work, unnecessary traffic and disruption in our traditional neighborhoods will be avoided.

Lastly, our housing crisis is real and is a regional problem. We simply need all kinds of housing, from for-sale and for-rent, from class 'A', to workforce to affordable. This project providing, new for-rent, market rate housing with an affordable housing component gets us closer to a solution.

Sincerely,

A handwritten signature in blue ink, appearing to read "Timothy J. O'Brien", is written over the typed name and title.

Timothy J. O'Brien  
Senior Managing Director

TOB/dr



*Via Electronic Mail*

June 20, 2019

Minoo Ashabi  
Principal Planner  
City of Costa Mesa  
Development Services Department  
77 Fair Drive  
Costa Mesa, CA 92626  
[minoo.ashabi@costamesaca.gov](mailto:minoo.ashabi@costamesaca.gov)

**Re: Earthjustice Comments on the Notice of Preparation of a Draft Environmental Impact Report for the One Metro West Development Project**

Earthjustice appreciates the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report (“DEIR”) for the One Metro West Development Project (“Project”), which contemplates the development of 1,057 dwelling units, 25,000 square feet of commercial creative office, 6,000 square feet of specialty retail, and 1.7-acres of open space. Our initial comments focus on the importance of incorporating building electrification requirements into the Project. The transition from gas to electric buildings is critical to reaching a zero emissions future and will not occur at the scale or timing needed absent decisive City leadership. Consistent with California Environmental Quality Act (“CEQA”) requirements to adopt all feasible mitigation to reduce significant greenhouse gas (“GHG”) and energy impacts, building electrification is essential mitigation to reduce Project impacts and take meaningful action to address climate change. Building electrification will also provide economic, safety, and air quality benefits for the City of Costa Mesa. We therefore urge the City to require all-electric construction as feasible mitigation in the DEIR for the Project.

**I. The Plan Will Have Significant GHG Impacts.**

CEQA requires a DEIR identify all the significant impacts of a proposed project, including from the project’s GHG emissions and energy use.<sup>1</sup> To determine the significance of the Plan’s GHG impacts, the City should apply a net-zero emissions threshold. A net-zero threshold is also consistent with the severity of the climate crisis and the recognition that any increase in GHG emissions exacerbates the cumulative impacts of climate.

In determining the significance of project impacts, the City “must ensure that CEQA analysis stays in step with evolving scientific knowledge and state regulatory schemes.” *Cleveland National Forest Foundation v. San Diego Assn. of Gov’ts* (2017) 3 Cal.5<sup>th</sup> 497, 519. Non-zero numeric thresholds, such as the 1,100 MT GHG significance threshold proposed by the Bay Area Air Quality Management District (“BAAQMD”) in 2009 are unlikely to survive legal

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<sup>1</sup> CEQA Guidelines § 15126.2; Appendix F; Appendix G § VII.

scrutiny. The BAAQMD numeric threshold was derived from Assembly Bill (“AB”) 32’s 2020 GHG reduction targets and does not reflect Senate Bill 32’s requirement to reduce GHGs to 40 percent below 1990 levels by 2030 or our increased understanding of the severity of climate impacts California is and will experience.<sup>2</sup> While useful when first recommended ten years ago, it has not kept in step with scientific knowledge and regulatory developments and is no longer supported by substantial evidence.

Alternative approaches to determining the significance of Project GHG impacts, such as using a comparison against “business-as-usual” emissions or a per capita emissions metric, may not withstand legal scrutiny and should not be used to evaluate the Project’s emissions in the DEIR. In *Center for Biological Diversity v. Cal. Dept of Fish & Wildlife* (2015) 62 Cal.4th 204, the California Supreme Court held that determining the significance of project GHG impacts by comparing project emissions with emissions under a business-as-usual scenario derived from statewide emissions reduction goals under AB 32 lacked substantial evidence. For similar reasons, use of statewide per capita emissions metrics to determine the significance of project emissions has also been rejected for the purpose of determining project GHG impacts under CEQA. As the court held in *Golden Door Properties LLC*, because “using a statewide criterion requires substantial evidence and reasoned explanation to close the analytical gap left by the assumption that the ‘level of effort required in one [statewide] context . . . will suffice in the other, a specific land use development.’” *Golden Door Properties LLC v. County of San Diego* (2018) 27 Cal.App.5th 892, 904 (quoting *Center for Biological Diversity*, 62 Cal.4th at 227). While use of a statewide per capita metric to determine the significance of GHG impacts may be useful for a General Plan, which examines collective community emissions of existing and proposed new development, it is not appropriate for projects that only govern new development. Accordingly, the City should apply a net-zero emissions GHG threshold to ensure a legally defensible EIR. Because the Project will result in an increase in GHG emissions, the City should consider its GHG impacts significant.

## **II. The Plan Will Have Significant Energy Impacts if it Requires Gas Connections.**

A key purpose of the evaluation of project energy impacts under CEQA is “decreasing reliance on fossil fuels, such as coal, natural gas and oil.”<sup>3</sup> Addressing energy impacts of proposed projects requires more than mere compliance with Title 24 Building Energy Efficiency Standards.<sup>4</sup> Including gas hook-ups in new projects, and thereby perpetuating reliance on fossil fuels, is contrary to California’s energy objectives and should be considered a significant impact under CEQA. As the California Energy Commission (“CEC”) determined its 2018 Integrated Energy Policy Report (“IEPR”) Update:

New construction projects, retrofitting existing buildings, and replacing appliances and other energy-consuming equipment essentially lock in energy system infrastructure for many years. As a result, each new opportunity for truly impactful investment in energy efficiency and fuel choice is precious. If the

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<sup>2</sup> See BAAQMD, *CEQA Guidelines Update, Proposed Thresholds of Significance* at 10-22 (Dec 7, 2009), <http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en> (explaining methodology for project-level GHG threshold).

<sup>3</sup> CEQA Guidelines, Appendix F, Sec. I.

<sup>4</sup> See *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211.

decisions made for new buildings result in new and continued fossil fuel use, it will be that much more difficult for California to meet its GHG emission reduction goals. Parties planning new construction have the opportunity instead to lock in a zero- or low-carbon emission outcome that will persist for decades.<sup>5</sup>

Accordingly, projects that contain new gas connections, and therefore result in new fossil fuel delivery infrastructure, have significant energy impacts under CEQA.

### **III. Building Electrification is Feasible and Effective Mitigation to Reduce Project GHG and Energy Impacts.**

A lead agency may not lawfully approve a Project where “there are feasible alternatives or feasible mitigation measures available which would substantially lessen [its] significant environmental effects.”<sup>6</sup> Eliminating natural gas use in new buildings is feasible mitigation that will substantially lessen the Project’s GHG and energy impacts. Indeed, building electrification is one of the fastest and most cost-effective ways to achieve the transition to net-zero emissions. In the 2018 IEPR Update, the CEC recognized the “growing consensus that building electrification is the most viable and predictable path to zero-emission buildings . . . due to the availability of off-the-shelf, highly efficient electric technologies (such as heat pumps) and the continued reduction of emission intensities in the electricity sector.”<sup>7</sup>

All-electric developments are being constructed for a range of building types pursuing low or zero emissions objectives and are a feasible mitigation requirement for new development under the Project. Sacramento’s Municipal Utility District has partnered with homebuilders to construct entire neighborhoods that are all-electric, with 400 all-electric homes planned in the next two years alone.<sup>8</sup> Some California developers now exclusively build all-electric homes, and have already deployed a range of affordable, luxury, single- and multi-family housing units all across the state.<sup>9</sup> Given that other entities are now requiring all-electric construction, there is no reason for the City not to also do so. For example, the University of California announced in August of 2018 that “[n]o new UC buildings or major renovations after June 2019, except in special circumstances, will use on-site fossil fuel combustion, such as natural gas, for space and water heating.”<sup>10</sup>

Similarly, in its Downtown Specific Plan, the City of Hayward required for multifamily residential developments that “[a]ll buildings will be all electric, meaning that electricity is the only permanent source of energy for water-heating, mechanical and heating, ventilation, and air

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<sup>5</sup> CEC, *2018 Integrated Energy Policy Report Update, Vol. II* at 18 (Jan. 2019), <https://efiling.energy.ca.gov/getdocument.aspx?tn=226392>

<sup>6</sup> Pub. Res. Code § 21002.

<sup>7</sup> CEC, *2018 Integrated Energy Policy Report Update, Vol. II* at 20 (Jan. 2019), <https://efiling.energy.ca.gov/getdocument.aspx?tn=226392>.

<sup>8</sup> Justin Gerdes, *All-Electric Homes Are Becoming the Default for New Residential Construction in Sacramento*, Greentech Media (Nov. 13, 2018), <https://www.greentechmedia.com/articles/read/all-electric-homes-are-becoming-the-default-for-new-residential-construction#gs.VYzCCMQ>.

<sup>9</sup> See Redwood Energy, *Development Projects (A Small Sample)*, <https://www.redwoodenergy.tech/development-projects/>.

<sup>10</sup> University of California, *UC sets higher standards, greater goals for sustainability* (Sept. 4, 2018), <https://www.universityofcalifornia.edu/press-room/uc-sets-higher-standards-greater-goals-sustainability>.

conditioning (HVAC) (i.e., space-heating and space cooling), cooking, and clothes-drying and there is no gas meter connection.”<sup>11</sup> The natural next step is to extend such a requirement to commercial developments, which can also be feasibly electrified.<sup>12</sup>

#### **IV. There Are Multiple Co-Benefits to Achieving Zero Emission Buildings through Electrification.**

Beyond achieving the energy and GHG emissions reductions essential for preventing climate breakdown, electrification of new buildings will produce a range of important co-benefits for the economic well-being, safety, and health of the community. Building electrification offers the potential to lower energy bills, reduce the cost of new construction, improve air quality, public safety, and climate resiliency, as well as create new jobs. Far from being a barrier to new housing, all-electric new construction can enable greater opportunities for affordable housing construction by reducing costs and streamlining mitigation requirements. For disadvantaged populations that pay a disproportionate amount of their income to energy costs, and who are more likely to suffer from asthma due to poor indoor air quality, zero emission homes are an important opportunity to deliver social equity.<sup>13</sup>

##### **A. Lowering Energy Bills and Cost of New Construction**

All-electric buildings can lower utility bills for tenants, reduce the cost of construction of new housing in the City, and shield customers from the volatile and increasing costs of gas. A recent report, *Decarbonization of Heating Energy Use in California Buildings*, by Synapse Energy Economics found that electrification could lower utility bills by up to \$800 annually and lower the cost of new construction in Los Angeles by roughly \$1,500 to \$6,000.<sup>14</sup> Other analysis has found that new homes and apartment buildings can cost between \$1,000 and \$18,000 less to build if they are not connected to gas distribution pipelines.<sup>15</sup> The UC has carefully examined feasibility and costs of all-electric buildings in the report: UC Carbon Neutral Buildings Cost Study. The first key insight offered is that “[a]ll-electric buildings are comparable or slightly less expensive than gas + electric buildings from a 20-year Life Cycle Cost perspective.”<sup>16</sup> The most significant cost savings were found for residential buildings, where the average Life Cycle Cost for all-electric was \$5.28/sf lower compared to gas + electric options.<sup>17</sup>

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<sup>11</sup> City of Hayward, *Hayward Downtown Specific Plan DEIR, Greenhouse Gas Emissions Chapter* at 4.6-40 (Jan. 7, 2019), <https://www.hayward-ca.gov/sites/default/files/documents/dtsp-eir-greenhouse-gas-emissions.pdf>.

<sup>12</sup> See, e.g., Redwood Energy, *Zero Carbon Commercial Construction: An Electrification Guide for Large Commercial Buildings and Campuses* (2019), [https://drive.google.com/file/d/1L5IBsSmT-p8he6dmrW56516ZB\\_dkXya9/view](https://drive.google.com/file/d/1L5IBsSmT-p8he6dmrW56516ZB_dkXya9/view).

<sup>13</sup> Kelly Vaughn, *Social Equity, Affordable Housing, and the Net-Zero Energy Opportunity*, Rocky Mountain Institute (May 9, 2018), <https://rmi.org/social-equity-affordable-housing-and-the-net-zero-energy-opportunity/>.

<sup>14</sup> Synapse Energy Economics, *Decarbonization of Heating Energy Use in California Buildings* at 2, 39 (Oct. 2018), <http://www.synapse-energy.com/sites/default/files/Decarbonization-Heating-CA-Buildings-17-092-1.pdf>.

<sup>15</sup> Stone Energy Associates, *Accounting for Cost of Gas Infrastructure*, CEC Docket 17-BTSD-01 (May 4, 2017), <https://efiling.energy.ca.gov/GetDocument.aspx?tn=217420&DocumentContentId=26959>.

<sup>16</sup> Point Energy Innovations, *UC Carbon Neutral Buildings Cost Study* at 3 (June 2017), <https://www.ucop.edu/sustainability/files/Carbon%20Neutral%20New%20Building%20Cost%20Study%20FinalReport.pdf>.

<sup>17</sup> *Id.*

## B. A Safer Community

Recent events from Aliso Canyon, San Bruno, and the state of Massachusetts add to the devastating record of hazardous natural gas infrastructure. Between 2015 and 2017, natural gas pipeline explosions and incidents in the country claimed on average 15 fatalities, 57 injuries, and \$316,647,907 in property damage *annually*.<sup>18</sup> As climate impacts intensify, the escalating risks of aging natural gas infrastructure will outpace the industry's rate of pipeline replacement. Sea level rise, which promises to be one of the many significant climate impacts affecting the region, especially amplifies the risks of natural gas.<sup>19</sup>

Methane leakage, a pervasive problem with natural gas infrastructure, can be particularly hazardous for families living in earthquake and fire-prone areas since leaking gas exacerbates fires after earthquakes. The California Seismic Safety Commission estimates that 20 to 50 percent of total post-earthquake fires are fires related to gas leaks.<sup>20</sup> Beginning to electrify entire communities is a key precautionary strategy to mitigate the growing risks of California's massive gas system.

## C. Improved Air Quality

Gas appliances in buildings make up a quarter of California's nitrogen oxide (NO<sub>x</sub>) emissions from natural gas. NO<sub>x</sub> is a precursor to ozone and a key pollutant to curb in order to comply with state and federal ambient air quality standards. Electrifying buildings will help the City to reduce NO<sub>x</sub> and ground level ozone, improving *outdoor* air quality and benefiting public health. Electrification of fossil fuel appliances will also immediately improve *indoor* air quality and health. On average, Californians spend 68 percent of their time indoors, making indoor air quality a key determinant of human health.<sup>21</sup> The combustion of gas in household appliances produces harmful indoor air pollution, specifically nitrogen dioxide, carbon monoxide, nitric oxide, formaldehyde, acetaldehyde, and ultrafine particles.<sup>22</sup> The California Air Resources Board warns that "cooking emissions, especially from gas stoves, have been associated with

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<sup>18</sup> Pipeline and Hazardous Materials Safety Administration, *Pipeline Incident 20 Year Trends* (Nov. 2018), <https://www.phmsa.dot.gov/data-and-statistics/pipeline/pipeline-incident-20-year-trends>.

<sup>19</sup> Radke *et al.*, *Assessment of California's Natural Gas Pipeline Vulnerability to Climate Change*, University of California, Berkeley (2016), <https://www.energy.ca.gov/2017publications/CEC-500-2017-008/CEC-500-2017-008.pdf>.

<sup>20</sup> California Seismic Safety Commission, *Improving Natural Gas Safety in Earthquakes* at 1 (adopted July 11, 2002), [http://ssc.ca.gov/forms\\_pubs/cssc\\_2002-03\\_natural\\_gas\\_safety.pdf](http://ssc.ca.gov/forms_pubs/cssc_2002-03_natural_gas_safety.pdf).

<sup>21</sup> Klepeis *et al.*, *The National Human Activity Pattern Survey (NHAPS): A Resource for Assessing Exposure to Environmental Pollutants*, J. EXPO. ANAL. ENVIRON. EPIDEMIOL., Vol. 11(3), 231-52 (2001).

<sup>22</sup> See, e.g., Logue *et al.*, *Pollutant Exposures from Natural Gas Cooking Burners: A Simulation-Based Assessment for Southern California*, ENVIRON. HEALTH PERSP., Vol. 122(1), 43-50 (2014); Victoria Klug & Brett Singer, *Cooking Appliance Use in California Homes—Data Collected from a Web-based Survey*, LAWRENCE BERKELEY NATIONAL LABORATORY (Aug. 2011); John Manuel, *A Healthy Home Environment?* ENVIRON. HEALTH PERSP., Vol. 107(7), 352-57 (1999); Mullen *et al.*, *Impact of Natural Gas Appliances on Pollutant Levels in California Homes*, LAWRENCE BERKELEY NATIONAL LABORATORY (2012).

increased respiratory disease.”<sup>23</sup> Young children and people with asthma are especially vulnerable to indoor air pollution.

#### **D. Pathways to Good, Green Jobs**

Electrification of buildings will enable local workforce development for jobs that will be critical in California’s broader energy transition. Partnering with local organizations and community colleges, the City can foster training and pipeline programs for new jobs in construction, HVAC installation, electrical work, energy efficiency and load management services, as well as manufacturing.

These jobs will rapidly grow in demand as local governments across the state look to rapidly address the emissions from their building sector. In Sacramento Municipal Utility District territory, where all-electric buildings are quickly becoming the default for new developments, demand for specialized plumbers and HVAC technicians is expected to grow enormously. The region expects to install more than 300,000 heat pump space heaters in the next 15 to 20 years.<sup>24</sup>

The next one to five years will be a critical window of opportunity for the City to jump-start this transition away from gas to clean energy buildings. CEQA is an essential vehicle to take all feasible action to reduce GHGs and limit further expansion of gas infrastructure and we urge incorporation of all-electric building design into the Project.

Please contact Matt Vespa at [mvespa@earthjustice.org](mailto:mvespa@earthjustice.org), Sasan Saadat at [ssaadat@earthjustice.org](mailto:ssaadat@earthjustice.org) with any questions or concerns, and please include each of us in future notifications on the Project’s development.

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<sup>23</sup> California Air Resources Board, *Combustion Pollutants* (last reviewed Jan. 19, 2017), <https://www.arb.ca.gov/research/indoor/combustion.htm>.

<sup>24</sup> Justin Gerdes, *Experts Discuss the Biggest Barriers Holding Back Building Electrification*, Greentech Media (Sept. 19, 2018), <https://www.greentechmedia.com/articles/read/here-are-some-of-the-biggest-barriers-holding-back-building-electrification#gs.fBEBKJy2>.