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Sent: Monday, August 31, 2026 3:34 PM
To: Mark Sakioka; TAI, CARRIE; MCGILL, ANNA; CARON, MARTINA; HALLIGAN, MICHELLE; YEAGER, CHRISTOPHER
Cc: Forbes, Amy R.; ELesk; CMeany
Subject: RE: Sakioka Comment Timing
Attachments: Collector Streets (Reference)(6003229839.1).pdf; Costa Mesa - NWWAB - ZCA ODS Comments [8.31.26](6003236090.2).xlsx

Hi all,

Following up on Mark's email below, attached please find an excel document with our updated comments on the August Review Drafts of the ZCA and ODS documents (as well as a few references to the NCMSPP and certain general plan elements where applicable). The document is fairly long but, in response to your feedback, we wanted to make sure that we provided you with clear document, section, and text references, as well as recommended edits and explanations for why we believe each edit makes sense. In many instances, we provided several alternative recommended edits for your consideration. I am happy to make myself available to walk you through the document if that would be helpful. We hope this more detailed approach will help expedite your review, despite resulting in a longer document.

You'll notice that the document is organized by topic per our in-person meeting, including:

1. Circulation
2. Building Height
3. Setbacks
4. Open Space
5. Architectural and Design Elements
6. Service Access
7. Townhomes
8. Off-Site Improvements
9. Parking
10. External Noise
11. Supremacy of Regulations
12. Document Consistency and Clarification
13. Master Plan Option in PD Zone

For each topic, we've provided the following columns:

(1) CIRCULATION	Public Review Draft Content (Issue)	Recommendations
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We are happy to discuss the attached at your convenience, and thank you for all of your efforts to move the NWWAB process forward.

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From: Mark Sakioka <mark@sakioka.com>

Sent: Friday, August 28, 2026 12:58 PM

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Subject: Sakioka Comment Timing

Hi Everyone,

Thank you again for your time last Wednesday. We really appreciated the meeting and found it very productive.

We wanted to give you a quick update that we've been working diligently to pull together our comments based on those discussions. We know timing is important, and we're planning to have everything over to you by end of day Monday.

Thanks again, and enjoy the weekend. Hopefully everyone stays cool!

All the best,

Mark Sakioka

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 SAKIOKA COMPANY

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Costa Mesa NWWAB - ZCA and ODS Review

(1) CIRCULATION Street Standards	Public Review Draft Content (Issue)	Recommendation	Document	Table/Section Reference	Explanation
	Private Streets. Must be designed to meet City Standards, but the smallest ROW for collector streets is 60'. See row below and separate PDF Sheets entitled "Collector Streets" for referenced City street standards.	Allow for internal and private streets to have finer grained street widths subject to the satisfaction of City Engineer. Recommended edits below in bold text to allow for such approval for both private and internal streets as a part of a master plan approval within PD zones: 2. Private and Internal Streets. <i>When provided, private streets, with the exception of parking aisles and streets internal to a master plan in a PD zone, shall be designed and constructed to the same structural, geometric, lighting, drainage, and landscaping standards as dedicated local or collector City streets to the satisfaction of the City Engineer, and shall include required sidewalks, landscaped parkways, and pedestrian lighting on both sides of the street. Private streets shall connect to the public right-of-way and align with existing signalized intersections, where feasible. Alternative street standards, including narrower streets, shall be processed and approved for streets internal to a master plan in a PD zone through the master plan approval process.</i>	ODS	C.2.d.2	All multi-family residential and mixed use buildings over three stories in height must comply with the ODS. The ODS incorporate public standards for private streets. This may work for infill development on a single parcel but is inconsistent with creating a pedestrian-friendly new neighborhood on larger lots. This revision would give those larger properties the flexibility to create new internal streets that are narrower than City's current minimum standard of 60', which optimizes for car travel on public through streets, and is consistent with the MUOD's stated purpose to "allow for the design of buildings that...[are] complementary and compatible to the existing character of the area in which they are located. (Sec. 13-83.11.0(h))
Collector Street (Housing Element and Circulation Element)	Table 3-8: Area 8 - Sakioke Lot 2 - Needs to be updated to remove collector street consistent with circulation element.	Revise Housing Element table to be consistent with Circulation Element; remove reference to unnamed collector street between Main St. and Anton.	Housing & Circulation Element	Table 3-8	Required for Internal General Plan consistency. Revision applies to Housing Element and the North Costa Mesa Specific Plan. See below.
Collector Street (NCMSP)	The NCMSP is intended to "depict" the MPH north of the I-405" (NCMSP, Pg. 28). However, certain figures and tables in the NCMSP have not been updated since the early 2000's and are no longer consistent with the City's Circulation Element. For example, there are several references to an unnamed collector street on Sakioke Lot 2 that does not exist and is no longer shown on the City's circulation element. See Figure 7, Table 2, Figure 16A, Figure 17, and Figure 18. See separate PDF Sheets entitled "Collector Streets".	Remove all reference to Collector Street on Sakioke Lot 2 for consistency with the City's Circulation Element. Max height on Sakioke Lot 2 should be reduced to 120 feet; 180 feet is inaccurate. As indicated in the Table/Section Reference column, this edit applies to multiple figures, 1 table and 3 discussion sections in the NCMSP. See row below and separate PDF Sheets entitled "Collector Streets"	NCMSP	Figure 7 - Master Plan of Streets and Highways; and Table 2 - Maximum Building Heights North Costa Mesa Specific Plan and Figure 16A (Area 6) and Figure 17 (Area 7) and Figure 18 (Area 8) and both the "Building Heights" and "Circulation" discussion under Area 8 - Sakioke Lot 2; and Figure 19 (Development Standards Summary)	See above.
(2) BUILDING HEIGHT	Building Height Code Definition: Rooftop Elements	Recommendation Add a new provision (3) under Subsection (h) Development Standards of Section 13-83.11.10 (Properties identified in Housing Element) that clarifies: "Height. For Housing Element sites, building height shall be measured to the top floor plate and height shall except and exclude: parapets, mechanical and facade access equipment, stair and elevator overruns, non-occupable structures, furnishings, cupolas, steeples, flags, towers, pergolas or other screening elements, ornamental architectural features and similar elements of an individual building." Alternatively, "For Housing Element sites" could be "For Housing Element Site projects approved through a master plan in a PD zone." OR, as an alternative to including this language in the Housing Element subsection of the MUOD, the above language could be added to BOTH (i) the end of the current FN 2 in Table 13-83.11.7 and (ii) FN2 could then also be added to the row addressing "rooftop architectural features" under "Projection Standards" in Table 13-83.11.7.	ZCA (MUOD)	Section Table 13-83.11.7	Explanation To achieve variation in skyline, make rooftop spaces usable and create more open space, some features, pergolas, etc. should be allowed. Qualifying rooftop open space (e.g., rooftop space generally open to the sky above except for unenclosed patios with solid or lattice roofs) isn't intended to serve as living space and should be counted separately from height. In particular, to achieve the densities provided in the Housing Element, it would be beneficial to have mechanical and elevator-type equipment permitted above the height limit. Without these revisions, buildings on housing element sites would need to eliminate entire residential floors to accommodate rooftop any features and equipment (even an OSHA-compliant parapet) within a given height limit.
Incorrect Height Limit in NCMSP	180 height (/12 stories) max on Sakioke Lot 2 still shown in NCMSP and in SP references in GP elements.	Maximum height of 120 feet on Sakioke Lot 2 should be shown across GP, SP and other zoning code references. See separate PDF Sheets.	NCMSP	Figure 18 (Sakioke Lot 2 Development Summary)	General Plan consistency.
(3) SETBACKS	Public Review Draft Content (Issue)	Recommendation	Document	Section	Explanation

Maximum Setback and Side Setback Abutting Residential	Front or Side Setback- min 10' to 20' max along public street. And: Requiring 10' side or rear abutting setbacks in residential areas.	Add bolded text to existing FN 4: "Minimum setbacks shall apply to all portions of a building or structure. Maximum setbacks along public streets shall only apply to a building or structure's ground floor, with exceptions for driveways, walkways, and open space. Notwithstanding the foregoing, alternative setback standards, including a zero setback along internal streets and adjacent to open space, may be provided for through an approved master plan for a Housing Element Site in a PD zone." Alternatively, the proposed language above in bold could be added as a Housing Element Sites exception under Section 13-83.11.7 under subsection (h) Development Standards, as it would only apply to Housing Element sites.	ZCA (MUOD)	Table 13-83.11.7	The NIMWAB updates require that all multi-family residential and mixed use buildings over three stories in height comply with the ODS. This max setback standard may work for infill development on a single parcel but is inconsistent with creating a pedestrian-friendly new neighborhood on larger lots where the City's Housing Element Sites Inventory provides for additional density. Requiring a maximum setback along internal streets will impact ability to have a seamless open space environment in a master planned context or to buffer external and adjacent conditions, such as freeways and freeway on-ramps.
(4) OPEN SPACE Open Space (Common or Publicly accessible)	Public Review Draft Content (Issue) The MUOD does not address whether projects with multiple buildings can satisfy their open space requirement through aggregated public open space.	Recommendation Add bolded text to existing FN 6: "All or a portion of the required usable common residential open space may be substituted by publicly accessible open space. If processed as a part of a master plan in a PD zone, open space requirements may be satisfied on a project-wide (rather than lot-by-lot) basis and the total percentage of open space and what qualifies as open space may be approved through the master plan process."	Document ZCA (MUOD)	Section Definitions and MUOD Table 13-83.11.7	Explanation In a master plan context, there needs to be flexibility to aggregate required open space into more usable chunks. Allowing for open space to be calculated and provided project-wide allows for larger contiguous open space within master planned communities, rather than requiring a more limited amount of open space on each lot.
Common Open Space	MUOD does not address internal vehicular circulation, etc. when calculating open space requirements.	Add a FN to the table clarifying that: "For purposes of this calculation, the lot shall be measured net of all streets, driveways, drive aisles, parking aisles, other areas designed or intended for vehicular travel and other required dedications for public use."	ZCA (MUOD)	Table 13-83.11.7	The area should be defined to match what is commonly viewed to be a "lot" elsewhere in the City, particularly for master planned communities.
Common Open Space	Hardscape. 25% max. paving for residential open space	Delete 25% maximum hardscape requirement and rely instead on the 25% minimum landscape requirement in Section 3.d.4 to ensure adequate plantings.	ODS	C.3.d.4	For courtyards and amenity areas and recreational facilities, restriction on 25% hardscape renders areas infeasible. Typical courtyards, amenity decks, and certain outdoor recreational facilities are precluded by the hardscape maximum. The landscape minimum addresses the same concern while allowing for a wider range of open space type.
Common Open Space and Publicly Accessible Open Space	Water Features. Max. of 5% of required common residential open space shall consist of decorative water features.	Add bolded text: "A maximum of five percent of the required common residential open space or publicly accessible open space shall consist of decorative water features, except where needed for stormwater management, which may include... "	ODS	C.3.d.7 and C.3.e.6	Clarify that a decorative water feature that incorporates necessary stormwater management does not count towards the 5%. Without this flexibility, large sites in North Costa Mesa identified in the Housing Element as having the capacity to otherwise add meaningful housing density will have difficulty meeting stormwater management requirements.
Private Open Space	Ground Floor Residential Units. Required private open space for ground floor residential units shall be enclosed by a fence, wall, and/or gate of a minimum height of 30 inches and a maximum height of 48 inches.	Add bolded text: "Required private open space for ground floor residential units, when the open space is street-facing, shall be enclosed by a fence wall, and/or gate of a minimum height of 30 inches and a maximum height of 48 inches. For master planned projects in a PD zone, a landscape element such as a hedge or planter may be provided in lieu of a fence, wall, or gate."	ODS	C.3.c.4	Landscape hedges and planters can provide screening while providing residents and neighbors with more green space. The proposed standard may make sense for smaller urban infill projects that may not have mechanisms in place to ensure that screening landscape is adequately maintained, whereas master plans can facilitate ongoing landscape quality through covenants and maintenance agreements.
Private Open Space	Paseo Frontage Requirement. Ground floor residential units, non-residential uses, and/or common residential spaces shall front the paseo and provide access to primary building entries.	We recommend removing this standard given challenges in objective interpretation, and that paseo access is already addressed under subsection b of C.2.c.2. Alternatively, we recommend the bolded addition below to allow for flexibility in a master plan project in a PD zone: "Ground floor residential units, non-residential uses, and/or common residential spaces shall front the paseo and provide access to required primary building entries, provided that alternative frontages and access may be provided for projects approved through a master plan in a PD zone."	ODS	C.2.c.2.f	From an objective standpoint, it is unclear which uses are (and are not) picked up by the phrase "residential units, non-residential uses, and/or common residential spaces." Is this intended to pick up all uses? It is also unclear what the objective standard is for determining "primary building entries" -- which entries do and do not qualify? To improve objection application, our primary recommend is to delete this standard or to make it permissive rather than mandatory. Alternatively, we recommend allowing for alternative paseo frontage/entrance requirements within a master plan area to allow for variation within a larger residential neighborhood.
Open Space (Common or Publicly accessible)	Publicly accessible/common open space requirements. Separate residential and commercial requirements -- shared open space should be permitted.	Add bolded text to FN 5: "Or as provided in an applicable specific plan. Additionally, master plans approved on property in a PD zone that include a mix of residential and commercial uses shall not be required to separate commercial and residential open space but may provide shared open space on a project-wide basis."	ZCA (MUOD)	Table 13-83.11.7.	In the mixed use context, it makes little sense to distinguish between commercial and residential publicly accessible open space. Open space should be provided on a unified basis.

Outdoor Lighting	Pedestrian lighting required every 30 linear feet	Revise as shown in bold and strikethrough : "pedestrian scaled outdoor lighting, such as light poles, bollards, bistro/sitting lights, shall be provided along required pedestrian pathways at least every 50 linear feet and shall not exceed 15 feet in height. Notwithstanding the foregoing, alternative outdoor lighting may be approved as a part of a master plan in a PD zone. "	ODS	C.7.b.5	As drafted, the standard prioritizes lighting over landscaping and limits tree planting. Adequate lighting can be provided at 50' and greater flexibility in lighting layout is appropriate in internal areas of master plans, where consistency along existing streets is not a consideration.
(5) ARCHITECTURAL AND DESIGN ELEMENTS	Public Review Draft Content (Issue)	Recommendation	Document	Section	Explanation
Projections	Projections into setbacks - The August Public Review draft added new projection standards to the MUOD development standards, including: Facade Details such as cornices, belt courses, sills, trims, or similar details - max 18" into any required setback; Awnings, trellises, roof eaves, or other overhangs - Max. 5 ft. into required front or side setback abutting a public street, or max. 2 ft. 6 in. into required side or rear setback along interior property line; Fireplaces - 2' max into any setback; face projections, such as bay windows, etc.	1. Add "shading devices" to the row of projections related to "bay windows, porticos, porches, etc. 2. Add a new FN to the row entitled "Projection Standards" that states: "Alternative projection standards, including larger maximum projections into setback areas, are allowed through an approved master plan in a PD zone." 3. In addition, as stated in the row on building height above, to address rooftop projections for Housing Element Sites, we recommend adding new provision (3) under Subsection (h) Development Standards of Section 13-83.11.10 (Properties Identified in Housing Element) that allows for: "(3) Height. For Housing Element sites, building height shall be measured to the top floor plate and height shall except and exclude: parapets, mechanical and facade access equipment, stair and elevator overruns, non-occupiable structures, furnishings, cupolas, steeples, flags, towers, pergolas or other screening elements, ornamental architectural features and similar elements of an individual building." Alternatively, "For Housing Element sites" could be "For Housing Element Site projects approved through a master plan in a PD zone."	ZCA (MUOD)	Table 13-83.11.7	We believe that some additions/adjustments to the projection standards added in August are appropriate either for all MUOD sites (e.g., clarification for "shading devices" such as fins and slats, which add visual interest and promote building efficiency, are a permitted type of projection) or at least for Housing Element Sites, where the currently proposed limitations would - as a practical matter - eliminate entire residential floors of housing, making it exceedingly difficult or impossible to achieve the densities provided for under the Housing Element on Housing Element Sites. For example, we believe the current height projection limitations would not accommodate rooftop any features and equipment (even an OSHA-compliant parapet) within a given height limit. Further, noted above, to achieve variation in skyline, make rooftop spaces usable and create more open space, some limited features, pergolas, etc. should be allowed. Qualifying rooftop open space (e.g., rooftop space generally open to the sky above except for unenclosed patios with solid or lattice roofs) isn't intended to serve as living space and should be counted separately from height. We also believe that allowing for occupiable building projections for stoops, stairs, etc. at the ground level to extend more than 2.5 ft into the 10-20' setback is particularly appropriate for Housing Element Sites. Without a change to that 2.5 ft projection maximum, it will be extremely difficult to provide the required amount of ground-level private space at or near the housing densities the City is contemplating in the Housing Element. However, we've recommended narrower changes that (a) clarify that "shading devices" are permitted projections and (b) allow for alternative setback standards, including larger projections, to be approved as a part of a master plan in a PD zone.

Ground Floor Entries	Ground Floor Residential Units. Each residential unit at the ground floor requires a primary building entry directly to the exterior.	For both clarity and safety (see explanation column), we recommend that the City consider deleting the requirement that units with frontage along the street provide a primary entry directly to the street and instead require that ground floor units provide an entry that fronts or is oriented toward an exterior street or common area, such as a courtyard, plaza, or paseo. Alternatively, we recommend the bold and strikethrough edits: "Except for units facing freeways and freeway on-ramps, each residential unit located on the ground floor shall provide a primary building entry directly to the exterior. For units with frontage along a street, the entry shall front/be oriented towards the street and provide a pedestrian walkway to the street, as illustrated in Figure 9. For units with frontage along the interior of a property, the entry shall front /be oriented towards an exterior common area, such as a courtyard, plaza, or paseo, and provide a pedestrian walkway to the exterior common area. Notwithstanding the foregoing, alternative entries may be approved in a master plan project within a PD zone for sites adjacent to (within 1/4 of a mile of) a freeway or freeway on-ramp."	ODS	B.3.d.3	"Frontage" is defined in the ODS as "the portion or length of a building on a property that directly abuts a street." However, this standard creates different requirements for frontages "along a street" and for frontages "along the interior of a property" that appear inconsistent with that definition. We recommend adding flexibility for units with frontage along a street to provide an entry that is either oriented towards a street or a common area, such as a courtyard, plaza, paseo. Additionally, in the context of multifamily housing, ground floor units with direct access from public spaces are not a viable housing option for many people due to privacy concerns and real and perceived security threats. In our experience, it is rare for women in particular to feel comfortable living in these units. We primarily recommend revisions that would provide flexibility to opt for enclosed courtyards without direct street access in most locations, which addresses privacy and safety without forgoing active frontage. In addition, for units facing onto freeways, which are hostile to pedestrians and would not benefit from activation, no outdoor space should be required. The adjacency of the freeway and heavily trafficked areas make the requirement that all units front on the street impractical and will detract from the quality of the units. If the City is not comfortable modifying this standard across the MUOD or for all Housing Element Sites, alternatives should be accommodated for master planned areas within a PD zone.
Ground Floor Entries	Number of Entrances for Non-Residential Uses and Common Residential Spaces. A minimum of one building entry shall be provided every 150 linear feet of street-facing ground floor building frontage	Expand distance between required entrances to allow for greater flexibility in organizing ground floor common entries and/or create internal street flexibility for PD zones by adding text in bold: "Number of Entrances for Non-Residential Uses and Common Residential Spaces. A minimum of one building entry shall be provided every 150 250 linear feet of street-facing ground floor building frontage. When adjacent to a street, the entry shall front/be oriented towards the street and provide a pedestrian walkway to the street. Notwithstanding the foregoing, alternative spacing for building entries may be approved on internal streets in a master plan project within a PD zone."	ODS	B.3.d.1	A distance of 250' provides for greater efficiency in housing layout in keeping with the intent to provide density at Housing Element sites. A larger distance provides greater flexibility for organizing ground floor common entrances. Additionally, flexibility in building entries in a master plan allows for variation that's appropriate in a multi-family community context.
Blank Walls	Maximum Length of Blank Walls. window, door, or other facade opening required every 10 feet for residential uses and 20 feet for non-residential uses.	Remove spacing requirement. Alternatively, apply 20' requirement to both residential and non residential uses.	ODS	B.2.e.1	Change accommodates shear walls and ensures efficiency of residential unit design.

Storage Standards	Each du required to have 200 CF of fully enclosed, securable, personal storage exterior to the unit.	Remove requirement. Alternatively, we recommend the edits in bold and strikethrough : "Each dwelling unit shall be provided with 200 cubic feet of fully enclosed, securable, personal storage area exterior to the unit. The storage area shall measure at least 7- 5 feet in one horizontal direction , provided a multi-family building with fifty (50) or more dwelling units shall only be required to provide such external storage space for 20% of the building's dwelling units. The storage area may be provided in a garage, carport, or other exterior or covered common area but shall be located so as not to obstruct the required clear dimensions. Notwithstanding the foregoing, alternative storage standards may also be approved in a master plan project within a PD zone ."	ZCA (MUOD)	Table 13-83.11.7	This amount of storage may be practical for smaller scale housing developments but would require significant space in, for example, a 200-unit apartment building. Assuming a 5'X5'8" storage closet/unit for each residence, a building of this size would have to devote 5,000 square feet to external storage, plus circulation space to allow access and door swings for each storage locker/closet. We recommend: (a) changing the minimum horizontal dimension to 5' - this recommendation is based on our review of multi-family floor plans with similar types of storage areas and is intended to allow for more efficient, more affordable, multi-family unit plans; (b) reducing the requirement for larger multi-family buildings, given that this type of external storage space is unlikely to be needed for residents in a larger multi-family building who usually do not have the kinds of tools and equipment typically stored in outdoor and garage-oriented storage areas and who can store bicycles in the required common bike rooms; and (c) allowing for approval of alternative storage standards as a part of a master plan in a PD zone, particularly in NCM where there are larger sites with the capacity to provide for more design variation.
(6) SERVICE ACCESS	Public Review Draft Content (Issue)		Document	Section	Explanation
Trash and Recycling	Trash and recycling areas prohibited within street-facing setbacks. Confirm that this applies to permanent trash locations only, not trash day collection locations. Add language clarifying this requirement does not apply to internal streets.	Add language in bold text : "Permanent trash and recycling areas shall not obstruct building entries, walkways, sidewalks, driveways, streets, alleys, and other required means of access and shall be prohibited within required street-facing setbacks, required parking areas, required landscaped areas, and required open space areas. The foregoing shall not apply to internal streets that are approved as a part of a master plan in a PD zone."	ODS	C.6.b.1	To achieve the densities in the housing element, multi-family projects cannot dedicate significant land area to internal access ways and turnarounds for service vehicles. For sites surrounded by streets and alleys on all sides, it may therefore be necessary to haul collection bins from an internal trash room to a loading zone or pad within a setback on trash day. Particularly in larger master plans, allowing flexibility around temporary trash pickup locations can facilitate a more efficient street network, leaving more land available for housing and open space.
(7) TOWNHOMES	Public Review Draft Content (Issue)		Document	Section	Explanation
Definition of Townhouse	Contrary to the definition of "Residential, multi-family" which includes townhomes as a multi-family use, townhouse is defined as a "single-family attached dwelling unit..."	Add language in bold text : "Townhouse. A single-family or multi-family attached dwelling unit located on an individual dwelling unit lot, and is part of a row of units that contains three or more dwelling units. Also referred to as rowhouse." Alternatively, just make this edit to the new definition of "rowhouse."	ZCA	Chapter 1, Article 2, Definitions	Definition of townhome should be revised so it is consistent with multi-family residential, which includes townhomes as a multi-family residential type. Townhomes/rowhomes are typically permitted in multi-family / mixed use settings to allow for variety in product types. Clarifying that townhomes are permitted under the MUOD is consistent with the MUOD's purpose to "encourage a variety of uses and development types" and "satisfy the demand for a variety of housing types." (Sec. 13-83.11.0)
New definition of Rowhouse	See row above.	Add language in bold text : "Rowhouse. A single-family or multi-family attached dwelling unit located on an individual dwelling unit lot and is part of a row of units that contains three or more dwelling units. Also referred to as townhouse."	ZCA	Chapter 1, Article 2, Definitions	See row above.
Definition of Residential, multi-family and MUOD permitted use table	Defined as: "Apartments, common interest developments, townhouses and similar multiple-family residential developments, including detached single-family homes where there is more than one primary dwelling unit on a lot." Residential, multi-family is not included in the MUOD permitted use table.	Add: "Residential, multi-family" to the list of permitted "residential uses" both (a) in the MUOD permitted use table and (b) to the list of permitted uses for Housing Element sites under 13-83.11.10, so it's clear that townhomes are permitted in the MUOD.	ZCA	Chapter 1, Article 2, Definitions and Table 13-83.11.6 and Section 13-83.11.10	See row above. As drafted, the table refers to just to "multi-family dwellings" which does not pick up townhomes. Townhomes are included in the definition of "Residential, multi-family" and consistent with the stated MUOD purpose to provide a "variety of housing types." So Residential, multi-family should be included to avoid any potential confusion that townhomes are not permitted under the MUOD.
Inconsistency between MUOD and ODS	The ZCA defines townhomes/rowhomes as containing "three or more dwelling units." The ODS defines a townhouse or rowhouse as "a building containing two or more attached dwelling units."	The ZCA and ODS definitions should be consistent (either both should require two dus or three dus).	ODS and ZCA	ZCA Chapter 1, Article 2, Definitions and ODS Section D. (Definitions)	Definitions should be consistent.
ODS Façade Design	Maximum Façade Length, Attached Units. States that no more than six townhomes in a row are permitted	Delete. Alternatively, change to 7 or 9 (avoid even number).	ODS and ZCA	ODS B.2.b.2 and ZCA 13-38(b)	We think the limit is unnecessary but if it imposed it should be an odd number so that the units can be centered around an open space or street.
(8) OFF-SITE	Public Review Draft Content (Issue)		Document	Section	Explanation

New Fees and Off-Site Improvements for MUOD	August draft of the MUOD added a second layer of off-site requirements, such that developers are now required to pay for off-site improvements twice.	Delete new section on off-site improvements.	ZCA (MUOD)	13-83.11.4(a) and (b)(1)	As a planning commissioner noted during the August study session, the MUOD already requires developers to pay development fees that are intended to cover cost of off-site impacts. Specifically, subsection (a) of this section of the MUOD requires that all projects satisfy requirements/pay fees related to these same types of improvements: (1) Major Thoroughfare and Bridge Fee; (2) Fire Protection System; (3) Transportation System Management; (4) Park and Recreation Impact Fees. As a practical matter, we believe this additional layer of the same type of off-site costs may make it infeasible for developers to actually produce the housing the Housing Element and MUOD are intended to facilitate in the City.
Same as row above.	Same as row above.	As an alternative to our primary recommendation above (i.e. to delete the new off-site improvement section), we recommend making all of the following revisions to this new section for the reasons described in the "explanation" column: (b)(1)(a)(iii) should be revised as shown in bold and strikethrough: "Be limited to improvements with having a direct and essential nexus and rough proportionality to the development's impact and the City's requirements. reasonably proportional to the project. The total cost of off-site public improvements required pursuant to this section shall not exceed 10 percent of total project construction valuation." - The following open-ended requirements should be removed: (b)(1)(b)(iv) street lighting requirements; (b)(1)(e) transit improvements; (b)(1)(h) other improvements - Subsection (b)(1)(i) cost should be removed, as it is contrary to state law. - The following blanket requirements should be removed as cost prohibitive for Housing Element projects: (b)(1)(c) utility undergrounding and (b)(1)(g) pathway trees and landscaping. - Add a new FN 13-83.11.4(b): "Alternatively, these requirements may be satisfied through the processing of a subdivision map in connection with a project."	ZCA (MUOD)	13-83.11.4(b)	An arbitrary, fixed 10% requirement does not comport with the Supreme Court's Nollan-Dolan standard for exactions under the Takings Clause of the US Constitution. Off-site improvements must have a direct and essential nexus and rough proportionality to a project. Exactions cannot be pre-fixed to an arbitrary %. Further, this section's prohibition in (b)(1)(i) on use of public financing is contrary to state law. State law allows for financing through a CFD. We have proposed: in (1.) revisions to (b)(1)(a)(iii) consistent with the Nollan-Dolan line of cases and in (3.) striking the financing restriction in (b)(1)(i) given state law provides for financing districts. In addition, the open ended nature of several of the off-site improvement requirements (e.g., the items described in 2.) -- the satisfaction of which would be subjectively determined by staff -- creates a lack of certainty that is both required for MUOD projects and, as a practical matter, necessary for developers who are planning for residential development on a Housing Element sites. As noted above, the MUOD already applies impact fees to address various off-site impacts. Requiring all projects to also upgrade additional public infrastructure is an exaction that has not been shown to have a direct and essential nexus to each particular project, and giving the City Engineer, Transportation Services Manager etc. the discretion to select any kind of additional improvement for a given project does not constitute an objective standard or meet constitutional muster. Several of the new off-site improvement requirements (e.g., the requirement that all MUOD projects underground utilities) are so cost intensive that we believe they (coupled with the impact fees already required by the MUOD) could, as a practical matter, make it cost prohibitive to actually develop housing on sites designated for housing in the Housing Element. We have proposed striking those especially cost-intensive improvement requirements in (4.)
(b) PARKING Clarify No Parking Requirements for Residential Uses Developed under the	Public Review Draft Content (Issue) Both the Housing Element and the MUOD indicate no parking for resi, but the third column in Table 13-83.11.7 (Development Standards for MUOD) also indicates that CMMC Title 13, Chapter VI (Off Street Parking Standards) Section on parking required in MUOD was deleted in the larger zoning code. Here is the text proposed for deletion: ~~"§ 13-86: Parking required in mixed-use overlay zone--in the mixed-use overlay zone, residential parking rates are provided at the applicable urban plan."~~ In addition, a new section 13-87 is proposed in Article I which is intended to cover Off-Street Parking Requirements in Residential Districts. It reads as follows: "§ 13-87. Objective Design Standards for Multifamily Residential and Mixed-Use Developments. Multifamily residential and mixed-use development projects shall be subject to the additional	Recommendation ~~Delete~~ reference to CMMC Title 13, Chapter VI (Off-Street Parking Standards) in this table. Alternatively , clarify which provisions of CMMC Title 13, Chapter VI apply and when (and expressly state that none of the off-street parking standards under Section 13-85 apply to residential uses developed under the MUOD). Restore Section 13-86, but clarify that "Sites developed under the mixed use overlay district are not considered residential districts for purposes of Chapter VI, Article I and have no residential parking requirements." ~~Either delete~~ proposed Section 13-87 as duplicative of language added at the end of Table 13-89 (which already refers to the overlay for non-residential parking requirements) ~~or~~ move this text into Article 2 (Off-Street Parking Standards (Non-Residential Districts) and revise the last sentence in Section 13-87 as shown in bold : "In the event of a conflict between this chapter and the Objective Design Standards, the ~~more restrictive regulation~~ Objective Design Standards shall prevail. "	ZCA (MUOD)	Table 13-83.11.7	As drafted, the table creates confusion as to whether parking is required for residential uses. This should be clarified to avoid inconsistency with the Housing Element.
Requirements for MUOD			ZCA	Section 13-86 and Section 13-87	As drafted, the zoning code creates confusion as to whether parking is required for residential uses in the MUOD. This should be clarified to avoid inconsistency with the Housing Element. Additionally, State law requires that objective design standards control over potentially subjective standards under the larger zoning code so, in the event of a conflict, the ODS should prevail.

Location of Parking	Location of Parking: "Parking and loading areas, with the exception of driveways and drive aisles, shall be prohibited along street-facing frontages, and shall instead be located on the interior side or rear side of the site where it is located behind a building or within a structure, as illustrated in Figure 14."	Recommended edits in bold text : "Location of Parking. Surface parking and loading areas, with the exception of short-term loading, parking, driveways and drive aisles, shall be prohibited along street-facing frontages, and shall instead be located on the interior side or rear side of the site where it is located behind a building or within a structure, as illustrated in Figure 14. Notwithstanding the foregoing, alternative parking locations may also be approved as a part of a master plan in PD zones. "	ODS	C.8.b.1	To achieve the densities in the Housing Element, multifamily projects cannot dedicate significant land area to internal access ways and turnarounds for short term loading and parking (e.g., for parcel and food delivery, rideshare pickup, leasing tour visitors). For sites surrounded by streets and alleys on all sides, prohibiting street-adjacent pull-ins for these purposes would require carving out significant internal land area and would produce inefficient building footprints. We would also like to clarify that this provision is intended to apply only to external parking and not parking areas inside of residential buildings, which are addressed elsewhere in the ODS, and that alternative locations may be approved as a part of master plan projects in limited zones.
Parking Structures	Above-grade parking structures shall not exceed 125' length along street-facing frontages, with the exception of alleys, as illustrated in Figure 15.	Revise to clarify: (a) that this requirement applies only to standalone structured parking (not residential parking decks) and public streets at the perimeter of a project; and (b) does not apply to internal circulating streets within a master plan in the PD zone. Recommended edits in bold text : "Parking Structures. Above-grade standalone parking structures shall not exceed a length of 125 feet along public street-facing frontages, with the exception of alleys, as illustrated in Figure 15, provided alternatives may be approved as a part of a master plan in PD zones. Parking structures along street-facing frontages shall be oriented and/or designed consistent with one of the following techniques: "	ODS	C.8.b.2	We agree that standalone parking structures should not exist along Anton and other public streets, but flexibility in this standard along private or internal streets can allow for district parking solutions, particularly within a master plan. We would also like to clarify that this provision is intended to apply to standalone parking structures and not parking areas inside of residential buildings, which are addressed through facade articulation and screening provisions elsewhere in the ODS.
Clarify Parking Requirements for MUOD	The additional parking provisions in subsection (b) indicate there may be parking requirements for residential uses under the MUOD.	Add new subsection (4) to clarify that "Notwithstanding the foregoing, no parking is required for residential uses under the MUOD."	ZCA (MUOD)	13-83.11.7.b. (Development Standards in MUOD Projects - Exceptions and Additional	As drafted, the section creates confusion as to whether parking is required for residential uses. This should be clarified to avoid inconsistency with the Housing Element.
(10) EXTERNAL NOISE STANDARDS	Public Review Draft Content (Issue) Noise element update deleted cross-reference to exemptions in the Noise Ordinance, but exemptions still exist in the Noise Ordinance. These exemptions would not apply to all of the types of open space and recreational areas which are planned for the ground floor in the proposed project that proximate to the freeway.	Recommendation Instead of striking the following two sentences on page N-6, make the following more limited edits in bold and strikethrough : "The Noise Ordinance further specifies that certain residential exterior areas such as private balconies, roof decks, and internal courtyards in a Mixed-Use Overlay District for live/work and multi-family residential development that are approved pursuant to a Master Plan, and subject to the land use regulations of an Urban Plan , are exempt from the residential exterior noise standards. A similar exemption also applies to high-rise residential development in the North Costa Mesa Specific Plan due to the adjacency of the freeway and freeway on-ramps. "	Document General Plan Noise Element	Section Noise Standards	Explanation Without the proposed edits, the general plan noise element and noise regulations in the zoning code are inconsistent. Additionally, the referenced exemption does not apply to ground floor open space and recreational areas, but due to the adjacency of the freeway it is otherwise impossible to comply. Thus, without these edits, sites designated for significant housing in the City's Housing Element could not be developed with that housing density under the City code.
Noise Element	The standard in the Noise Element (at page N-6) is lower than the noise standard in the NCMSP, which is: "The City's maximum acceptable exterior noise level for residential areas is 65 CNEL." This means there is an inconsistency between the GP and the NCMSP, as well as an inconsistency between the GP and the larger zoning code, where 65 CNEL is also referenced.	Recognize in the Noise Element that in NCM exterior noise can be at 65 CNEL for residential areas. Exempt "high-rise development in the North Costa Mesa Specific Plan due to the adjacency of the freeway and freeway on-ramps" -- could be a new FN at Table N-2 (Residential Exterior and Interior Standards).	General Plan Noise Element	PDF page 21, "Noise"	Same as above.
Zoning Code Noise Regulations	50 dBA max at night and 55 dBA during the day, with limited exceptions that do not account for freeway-adjacent property and property near the airport in NCM.	Expand exceptions to address freeway adjacent properties in NCM by making revisions shown in bold and strikethrough : "Exception: For multi-family residential development or live/work units approved in a mixed-use overlay district, the exterior residential noise environment does not include the following areas: Private balconies or patios regardless of size, private or community roof decks/roofterraces, internal courtyards and landscaped walkways, ~~that do not include~~ as well as resident-serving, active recreational uses such as community pool, spa, tennis courts, barbeque, and picnic areas, and passive open space approved through a master plan in a PD zone for a project adjacent to (within a 1/4 mile of) a freeway or freeway on-ramp."	ZCA	Definition of "Exterior residential noise environment"	We are fine with the internal noise standards. However, for freeway-adjacent property near the airport in NCM, it may not be feasible to provide any open space meeting the exterior noise standards making it exceedingly difficult or impossible to actually develop housing on property within NCM currently designated as Housing Element Sites, particularly utilizing the approval processes provided under the MUOD. Consistent with the goals of NMMAB, these standards should not prevent Housing Element sites to be processed and approved under the MUOD.

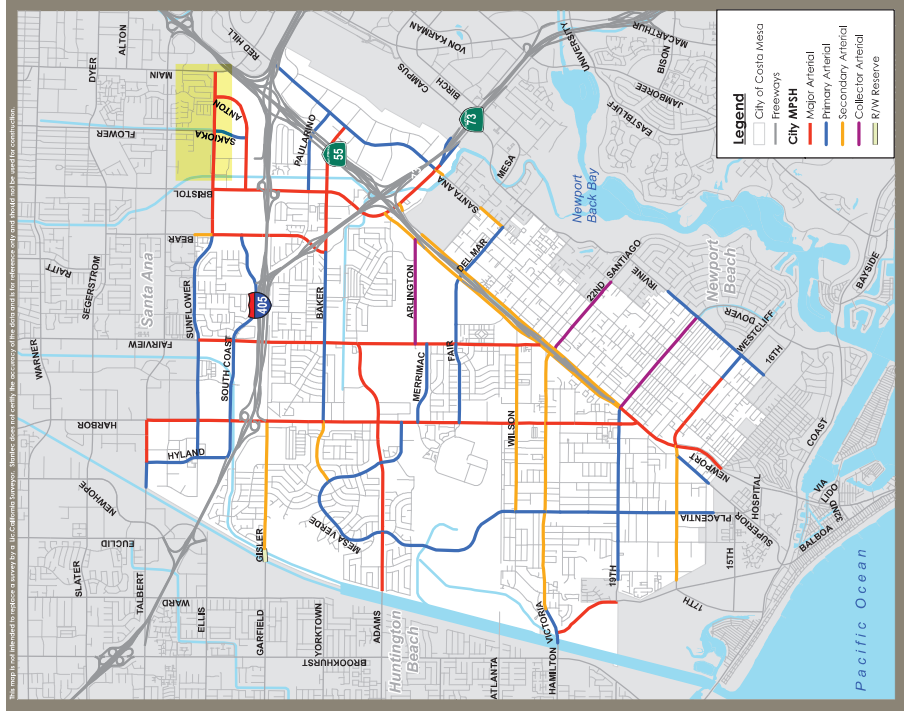
Zoning Code Noise Regulations	See row above	Make revisions shown in bold and/or strikethrough : "(3) Internal courtyards and landscaped walkways, as well as that ~~do not include~~ resident-serving, active recreational uses such as community pool, spa, tennis courts, barbecue, and picnic areas, and passive open space approved through a master plan in a PD zone for a project adjacent to (within a 1/4 mile of) a freeway or freeway on-ramp. "	ZCA	Section 13-280(d)	Same as above.
Zoning Code Noise Regulations	See row above	Make revisions shown in bold and/or strikethrough : "(4) In high-rise residential developments in the North Costa Mesa Specific Plan, the exterior noise standards shown in subsection (a) shall not only apply to the common outdoor recreational amenity areas located on the ground level. R-1 recreational amenity areas located above the ground level and private balconies and patios. Common outdoor recreational amenity areas located above the ground floor approved through a master plan in a PD zone for a project adjacent to (within a 1/4 mile of) a freeway or freeway on-ramp shall also be exempt from this standard. "	ZCA	Section 13-280(e)	Same as above.
Zoning Code Noise Regulations	Is the following revision (the underlined text) meant to exempt single family from noise requirements? "(a) <u>With the exception of projects in the R-1 Single-Family Residential District, if the proposed residential project is to be located in proximity to a freeway, major arterial, airport or any other source of significant noise, an acoustical evaluation of the working drawings may be required to be submitted by an acoustical engineer for approval by the city. The noise levels shall certify that the construction will reduce interior noise levels to 45 CNEL and exterior noise levels to 65 CNEL.</u> "	We propose to remove the exterior noise limit.	ZCA	13-28(a)	We agree that the 45 CNEL interior noise standard is acceptable. For exterior noise, if the area already exceeds 65 CNEL there may be nothing that the project can do to reduce that noise level therefore making it exceeding difficult or impossible to develop housing on property within NCM currently designated for housing units in the Housing Element, particularly utilizing the approval processes provided under the MUOD. Consistent with the goals of NMMWAB, these standards should not prevent Housing Element sites to be processed and approved under the MUOD. It is also unclear why R-1 single family districts are categorically exempt.
(11) SUPREMACY OF REGULATIONS	Public Review Draft Content (Issue)	Recommendation	Document	Section	Explanation
MUOD	Unclear that the MUOD supersedes otherwise applicable zoning provisions when an applicant elects to develop a site within the overlay using the MUOD requirements.	Add a "notwithstanding" to ensure that the MUOD standards apply. Proposed revisions in bold and strikethrough: "Unless otherwise specified, ~~in~~ here the provisions of split and intent of this Article differ from those in CHMC Title 13 (zoning code) or other City regulations, including the citywide objective design standards and specific plans, the provisions of this Article shall control, notwithstanding anything to the contrary. Where this Article is silent on a subject, the requirements of the Zoning Code shall remain applicable. This article is subject to the requirements of state law, including but not limited to the Housing Accountability Act.."	ZCA (MUOD)	13-83.11.1(f) - Conflicts with applicable requirements.	The "unless otherwise specified" language creates confusion and circularity. We understand that the intent of the MUOD is to supersede other zoning regimes and the language needs to expressly say so.
ZCA/ODS	Text suggests that the objective design standards may be overridden by more restrictive requirements elsewhere in the Code	Revisions in bold and strikethrough : "Multifamily residential and mixed-use development projects shall be subject to the additional applicable standards in the City of Costa Mesa Multifamily Residential and Mixed-Use Objective Design. In the event of a conflict between this chapter and the Objective Design Standards, the Objective Design Standards ~~more restrictive regulation shall prevail.~~ "	ZCA (MUOD) - Chapter V, Article 9	13-76.1 - Objective Design Standards for Multifamily Residential and Mixed Use Developments	State law requires that objective design standards control over potentially subjective standards under the larger zoning code so, in the event of a conflict, the ODS should prevail. As articulated at the planning commission, we understand that the intent is to allow property owners to have the benefit of the MUOD without reducing rights under the existing regulations.
ZCA/ODS	Same as above	Revisions in bold and strikethrough : "(a) Multifamily residential and mixed-use development projects shall be subject to the additional applicable standards in the City of Costa Mesa Multifamily Residential and Mixed-Use Objective Design. In the event of a conflict between this chapter and the Objective Design Standards, the Objective Design Standards ~~more restrictive regulation shall prevail.~~ "	ZCA (MUOD) - Chapter VII (Landscaping)	13-108.1. Objective Design Standards for Multifamily Residential and Mixed-Use Developments.	Same as above.
ZCA/ODS	Same as above	Revisions in bold and strikethrough : "These Standards regulate site and building design for multifamily residential and mixed-use development projects and are in addition to those regulations established in the City's Municipal Code, specifically Title 13 (Planning, Zoning, and Development, hereafter referred to as the "Zoning Code") and Title 5 (the Building and Structures Code). In the event of a conflict between these Standards and the Municipal Code, these Standards ~~the more restrictive regulation shall prevail.~~ "	ODS	Section 4b) Relationship to Costa Mesa Municipal Code	Same as above.

ZCA/ODS	Text suggests that the ODS are additive, which is inconsistent with the legal requirement.	Delete "intent" subsections indicating that the objective design standards are intended to "augment" development standards elsewhere in the Code.	ODS	C.2.a (Access and Circulation); C.3.a. (Open Space and Landscaping); C.4.a. (Walls, Fences and Hedges); C.5.a. (Building Equipment and Utilities); C.6.a. (Trash and Recycling Areas); C.7.a.	By using the word "augment," the text is suggesting that the MUOD standards are additive. But, as noted above, if the underlying requirements are subjective then the legal requirement for having objective standards won't be met when the two are added together.
ZCA/ODS	Text suggests that the objective design standards may be overridden by more restrictive requirements elsewhere in the Code	Revisions in bold and strikethrough : "The applicable development standards set forth in the following sections of Title 13 of the CMMC shall apply, with the additions and exceptions established in these Standards. In the event of a conflict between these Standards and the Municipal Code, the more restrictive regulation these Standards shall prevail. • Article 9 (General Site Improvement Standards) of Chapter V (Development Standards), specifically: - Section 13-73 (Trash enclosures). - Section 13-74 (Elevation and screening requirements). -Section 13-75 (fences and walls): • Chapter VI (Off-Street Parking Standards), specifically: - Article 3 (Development Standards) • Chapter VII (Landscaping Standards)"	ODS	Section C.1. Applicability of Other Related Standards	By making the more restrictive standard apply, you are giving up newly created objective standards that facilitate housing. Additionally, fence and wall requirements are already addressed in the ODS, and the standards in Section 13-75 conflict with ODS's general intent as well as its objective standards. For example, Section 13-75 requires 6'-high walls surrounding residential development, whereas the ODS aims to create active and accessible building frontages, for example by limiting stoop wall height to 48". Deleting reference to Sec. 13-75 eliminates confusion in the objective application of wall and fence standards.
MUOD	Subsection (e)(1) suggests that supersession under the MUOD works differently. Lower-income Housing Element Sites than other Housing Element Sites. What is the intended difference?	We believe that this language should instead apply to all housing element sites and be item (1) under subsection (e) - Supersession of Overlay, with the following edits shown in bold : Supersession of Other Zoning Provisions: "Projects on Housing Element Sites (Lower-income-Housing Element Sites) shall be governed by this Section, and the provisions in this Section shall supersede and prevail over any conflicting provisions of the property's underlying base zone, specific plan, overlay, and all other applicable zoning provisions relating to minimum residential densities and capacities, minimum residential floor area, ministerial review and approval, permitted uses, unit caps, trip budgets, and maximum building heights. Notwithstanding the foregoing, to the extent an applicable Specific Plan allows for more permissive standards or provisions, including greater maximum allowable residential densities and greater maximum building heights, projects on Housing Element Sites (Lower-income-Housing Element Sites) may utilize such standards and provisions in the Specific Plan ."	ZCA (MUOD)	13-83.11.10.(e)(1)	We understand that projects on lower-income housing element sites that provide at least 20 percent affordable should be processed as a use by right under state law as subsection 13-83.11.10.(e)(1)(ii) indicates, but we believe that the supersession text in subsection 13-83.11.10.(e)(1)(i) is intended to apply to all Housing Element Sites and have proposed moving it up above the subsection limited to 'Lower-income Housing Element Sites' and making the in-line edits suggested to clarify. See related comments / explanations below.
MUOD	MUOD Table 13-83.11.7 incorporates zoning code development standards for design elements that are already addressed in the ODS.	Proposed edits shown in bold : "General Site Improvement Standards: <i>MUOD projects are subject to the applicable general site improvement standards in CMMC Title 13, Article 9 (General Site Improvement Standards) of Chapter V (Development Standards), provided that in the event of a conflict between such standards and the provisions or spirit and intent of the City's objective design standards, the objective design standards shall prevail. Section 13-75 is not applicable.</i> "	ZCA (MUOD)	Table 13-83.11.7	The larger zoning code's general site improvement standards address topics, like trash and recycling, walls, fences, etc. that are addressed in the ODS. To the extent of a conflict between the two (including the objective intent of the ODS), it should be clear that the ODS prevails. Section 13-75 includes wall and fence standards that - as noted above - are duplicative of /inconsistent with the ODS, so we've clarified that section is not applicable.
(12) DOCUMENT CONSISTENCY AND	Public Review Draft Content (Issue)	Recommendation	Document	Section	Explanation
Density	Figure 13-83.11.7. (MUOD Sub-Area Map) shows maximum density for NCM Sub-Area at 60 du/ac	Either revise NCM to show 90 du as the maximum OR add an asterisk to where the legends shows 60 North Costa Mesa Sub-Area that reads: "Except where the City's Housing Element allows for additional residential density, in which case the housing element density maximum shall apply."	ZCA (MUOD)	Figure 13-83.11.7.	Zoning Code to be consistent with General Plan, which allow for up to 90 du/acre in North Costa Mesa.
Density	The height standards section accurately notes that maximum density is 90 du/ac but the density standards	Change 60 du/ac under NCM to 90 du/ac.	ZCA (MUOD)	Table 13-83.11.7	Table 13-83.11.7 should be internally consistent. This relates to the comment in the row above.
Density	FN 2 addresses higher heights but not additional density permitted under an applicable Specific Plan. See also row below.	Add bolded text: "Or as provided in an applicable specific plan, whichever is higher, or allows for more density. Density to be measured based on gross acreage. "	ZCA (MUOD)	Table 13-83.11.7	See row above and row below.

Density	Clarify density for Housing Element Sites is measured based on gross acreage.	Add bolded text: "Maximum Densities. Maximum residential densities shall be permitted as specified in the Housing Elements Sites Inventory and measured based on gross acreage."	ZCA	Section 13-83.11.10. (Properties Identified in Housing Element), Subsection (h)(2)(i)	Text addition clarifies what we believe is the intended policy for housing density.
NCMSP	The "Application of Mixed-Use Overlay District and Select Properties identified in the Housing Element" section does not address development standards and is inconsistent with Section 13.83.11.10 of the Zoning Code.	Proposed edits shown in bold and strikethrough : "In 2026, this specific plan was amended for consistency with an amendment to the City's Zoning Map to facilitate residential and mixed-use development. While base zoning districts remain the same, the Mixed-Use Overlay District (MUOD) was applied to select properties in the plan area. The MUOD is an overlay district and shall only apply to the parcels identified in the City's Zoning Map. This specific plan shall continue to apply to a property unless specifically superseded by a MUOD project when a property owner chooses to exercise provisions of Article 11 (Mixed-Use Overlay District) of Chapter V (Development Standards) of Title 13 (Planning and Development) of the Costa Mesa Municipal Code on a qualifying property. However, projects on sites identified in the City's currently adopted Housing Element Sites Inventory Lower-Income Housing Element Sites - shall be governed by Section 13.83.11.10 (Properties Identified in Housing Element) (Supersession-of-Overlay) of Article 11, and the provisions in that section shall supersede and prevail over any conflicting provisions of the property's underlying base zone, specific plan, overlay, and all other applicable zoning provisions relating to minimum residential densities and capacities, development standards, minimum residential floor area, ministerial review and approval, permitted uses, unit caps, trip budgets, and maximum building heights. Notwithstanding the foregoing, to the extent that this specific plan allows for more permissive standards or provisions, including greater maximum allowable residential densities and greater maximum building heights, projects on the City's currently adopted Housing Element Sites Inventory Lower-Income Housing Element Sites may utilize such standards and provisions in the specific plan."	NCMSP	"Application of Mixed-Use Overlay District and Select Properties identified in the Housing Element" section	To avoid confusion, the text should clarify that the MUOD development standards supersede the development standards in the NCMSP (subject to the last sentence of this paragraph). Section 13.83.11.10 is entitled Properties Identified in Housing Element (not Supersession of overlay) and is applicable to "all sites identified in the City's currently adopted Housing Element Sites Inventory" not just "Lower Income Housing Element Sites." This section of the NCMSP should be revised accordingly so that the documents are consistent.
PD under MUOD	Application of MUOD standards are tied across several of the NWWAB documents to "Lower-Income Housing Element Sites", which the existing draft defines as: "any Housing Element Site identified in the City's currently adopted Housing Element Sites Inventory that accommodates any portion of the City's lower-income RHNA and subject to the requirements of Government Code Section 65583.2 (h) and (i).". It is unclear what the "subject to" clause is intended to accomplish, when section	Recommend making the following edit shown in strikethrough: "Lower-Income Housing Element Site" means any Housing Element Site identified in the City's currently adopted Housing Element Sites Inventory that accommodates any portion of the City's lower-income RHNA and subject to the requirements of Government Code Section 65583.2 (h) and (i).". Alternatively, add "(or developed through a master plan in a PD zone)" after (i).	ZCA (MUOD)	Sec 13-83.11.10.d Properties Identified in Housing Element - Definitions	We do not understand what the reference to the Government Code section means, when the definition is already described as applying to "lower-income RHNA". What are the requirements for utilizing the override? As discussed above, it seems that the override should apply if we are building any housing on a Housing Element Site, not exclusively lower income housing.
NCMSP	Discussion of Area 6 and Area 8 should be updated to reflect that each site is zoned PDC and MUOD.	Add bolded text: "The site is designated Urban Center Commercial by the General Plan and is zoned PDC and MUOD."	NCMSP	Discussion of Area 6 - South Coast Metro Center and Area 8 - Sakioka Lot 2	GP/SP consistency item.
NCMSP	Application of the MUOD is not consistent applied to Sub-Areas 2, 3 and 4.	Add the following new language from Sub-Area 2 to the end of the descriptions for Sub-Area 3 and 4: "The MUOD also establishes densities on sites where the MUOD applies."	NCMSP	Discussion of Sub-Area 3 and Sub-Area 4 under Discussion of Area 6 South Coast Metro Center	GP/SP consistency item.
NCMSP	Bullet Point 2 under "Development Standards and Trip Budget" suggest that the site is not entitled to the ministerial approval process provided under the MUOD.	Add bolded text: "Planned Development Standards of the PDC zone are applicable to the site, unless otherwise indicated in the North Costa Mesa Specific Plan or the MUOD."	NCMSP	Discussion of Area 8 - Sakioka Lot 2	GP/SP consistency item.
Errant Reference	Footnote 4 references symbols that aren't used in the table.	Revise as shown in bold and strikethrough . For the purposes of this table, the symbols in the non-shaded areas shall have the following meaning: C—Conditional Use Permit; MC—Minor Conditional Use Permit; P—Permitted; ~~P—Prohibited~~ ; and S—Special Use Permit.	ZCA (MUOD)	FNs to Table 13-83.11.6. (Permitted Uses in the MUOD)	Errant reference from larger zoning code permitted use table.
Errant Reference	Footnotes listed but not used in table.	Mark FNs that aren't included in the table as "reserved" or "intentionally deleted".	ZCA (MUOD)	FNs to Table 13-83.11.6. (Permitted Uses in the MUOD)	Errant reference from larger zoning code permitted use table.
(13) Master Plan Option in PD Zone	Public Review Draft Content (Issue)	Recommendation	Document	Section	Explanation

Process	Clarify in the MUOD that an applicant may opt into a master plan approval in the PD base zone.	Add bolded text: "(1) Use by Right and Processes. A project on a Lower-Income Housing Element Site that provides at least 20 percent of the total dwelling units affordable to Lower-Income households shall be processed as a Use by Right, consistent with Government Code Section 65583.2(h) and (i). Such projects shall be subject only to ministerial review to verify compliance with all applicable objective design and development standards in accordance with a Streamlined Development Review process per CMMC Title 13, Chapter III (Planning Applications). A n MUOD project that does not qualify as a Use by Right shall be processed in accordance with a Development Review process per CMMC Title 13, Chapter III (Planning Applications). At the election of an applicant, a master plan is also optional for MUOD projects in a PD zone."	ZCA (MUOD)	13-83.11.10(f) (Review and Approvals Procedure)	Clarifying that you can opt into a master plan in a PD zone where MUOD provisions otherwise apply, including the PDC base zone in North Costa Mesa. Intended to facilitate development of larger housing projects on limited sites, consistent with Housing Element goals and policies.
Process	Clarify in Chapter III - Planning Applications that an applicant may opt into a master plan approval in the PD base zone.	Add bolded text: "(g) Master plan. Prior to development in the planned development (PD), town center (TC), shopping center (C1-S), and all types of institutional and recreational (I&R, I&R-S, and I&R-MLT) zoning districts, a master plan is required. At the election of an applicant, a master plan is also optional for MUOD projects in a PD zone. Preliminary master plans are required in the TC and I&R-MLT zone, are optional in PD zones, and are not required in C1-S, I&R-S, and I&R zones."	ZCA (Chapter III - Planning Applications)	Section 13-27 (Types)	Clarifying that you can opt into a master plan in the PD zone where MUOD provisions otherwise apply. Intended to facilitate development of larger housing projects on limited sites, consistent with Housing Element goals and policies.

GENERAL PLAN AMENDMENT - CIRCULATION ELEMENT



C-12 | Costa Mesa General Plan

Collector Streets | Circulation & Parking

Sakioke Property, Costa Mesa August 19, 2026

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SPECIFIC PLAN AMENDMENT (MARCH 2026)

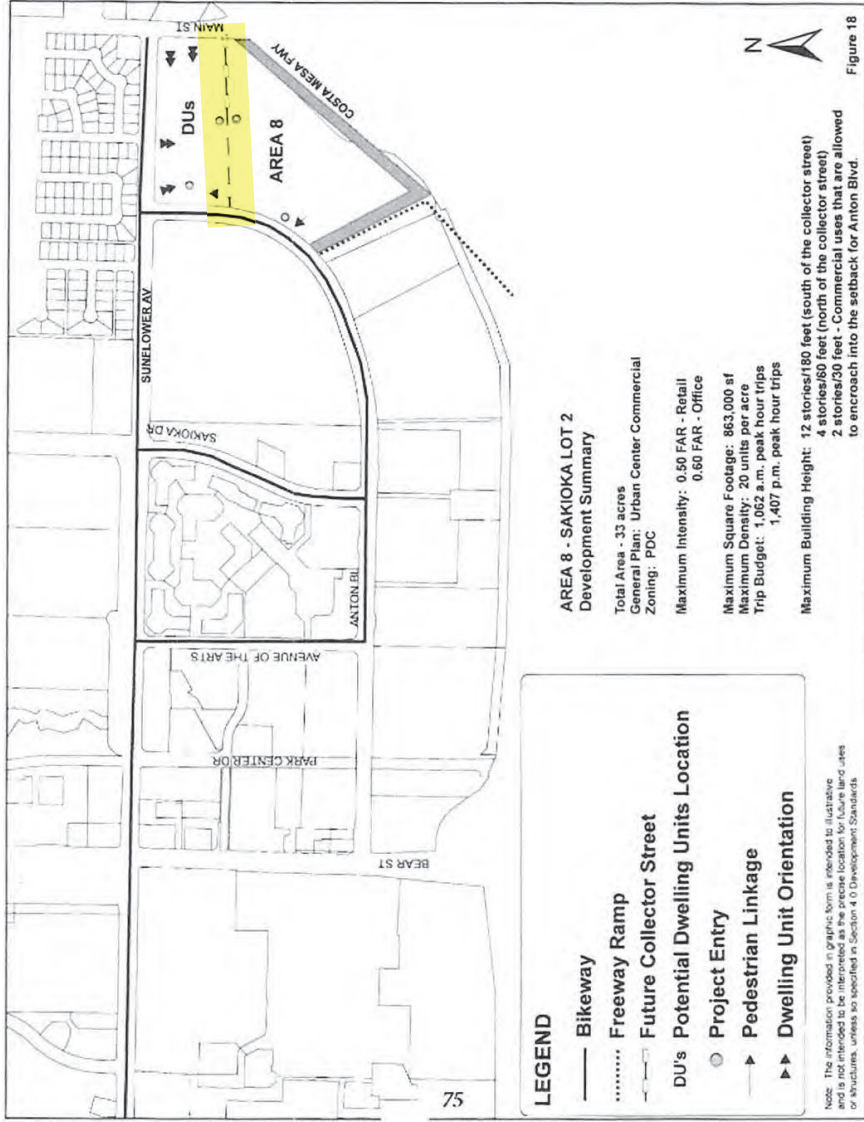


Figure 18

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Table 2- Maximum Building Heights North Costa Mesa Specific Plan		
SUB-AREA	MAXIMUM BUILDING HEIGHT ^{1, 2}	NOTES
AREA 1 Home Ranch	Varies	See Exhibit 11b.
AREA 2 Metro Pointe	30 feet-north of South Coast Drive (approx. 2 stories) 90 feet-south of South Coast Drive (approx. 6 stories)	Current development agreement allows buildings up to 15 Buildings above 173 feet in height will require a determination of no hazard by the FAA.
AREA 3 South Coast Plaza and Crystal Court	85 feet (approx. 4 stories)	None
AREA 4 SCP Town Center	315 feet (approx. 25 stories)	Buildings above 173 feet in height will require a determination of no hazard by the FAA.
AREA 5 The Lakes	Mid-rise Residential-90 feet (approx. 6 stories) High-rise Residential - 280 feet (approximately 26 stories) Commercial- 110 feet (approximately 11 stories)	Buildings above 173 feet in height will require a determination of no hazard by the FAA.
AREA 6 South Coast Metro	Varies-See Table 6B.	Buildings above 173 feet in height will require a determination of no hazard by the FAA. Buildings which encroach into the setback for Anton cannot exceed 30 feet (approx. 2 stories) within the
AREA 7 Sakioka Lot 1	60 feet (approx. 4 stories)	Buildings which encroach into the setback for Anton Blvd. and/or Sakioka Dr. cannot exceed 30 feet (approx. 2 stories) within the setback area.
AREA 8 Sakioka Lot 2	North of collector street- 60 feet (approx. 4 stories) South of collector street- 120 feet (approx. 8 stories)	Buildings above 161 feet in height will require a determination of no hazard by the FAA. Buildings which encroach into the setback for Anton cannot exceed 30 feet (approx. 2 stories) within the setback area.
1. All building height measurements reference the height above grade- not mean sea level. 2. The maximum building heights specified in this Specific Plan shall continue to apply to a property unless specifically superseded by a MUOD project ~~when a property owner chooses to exercise, as applicable. If the MUOD~~ provisions of Article 11 (Mixed-Use Overlay District) of Chapter V (Development Standards) of Title 13 (Planning and Development) of the Costa Mesa Municipal Code <u>apply</u> on a qualifying property, ~~in which case-~~ the higher height limit as between the MUOD and this Specific Plan shall apply.		