

396 East 21st Street Costa Mesa Project

Class 32 CEQA Exemption Justification

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1. INTRODUCTION

The Applicant for the proposed Project is requesting approval from the City of Costa Mesa to develop 21 single-family lots, consisting of 21 detached units. The City of Costa Mesa is the Lead Agency for the proposed Project. The Lead Agency will utilize this document as evidence that the proposed Project qualifies for the Class 32 Infill Exemption, which is further described below.

1.1. PURPOSE OF NOTICE OF EXEMPTION

Article 19 of the California Environmental Quality Act (CEQA) Guidelines includes, as required by Public Resources Code Section 21084, a list of classes of projects which have been determined not to have a significant effect on the environment. This document demonstrates that the proposed Project qualifies for a CEQA Exemption as an Infill Development Project (Class 32 Exemption), consistent with the provisions of CEQA Guidelines Sections 15332 and 15300.2 and provides information for City decisionmakers to find that the proposed Project is exempt under CEQA.

Pursuant to CEQA Guidelines Section 15332, the Project qualifies for a Class 32 Exemption because it is: (1) consistent with the General Plan designation and policies and zoning regulations; (2) is located within the City limits, surrounded by urban uses, and is less than 5 acres in size; (3) has no value for endangered, rare, or threatened species; (4) would not result in any significant effects related to traffic, noise, air quality, or water quality; and (5) can be adequately served by all required utilities and public services. Additionally, this document demonstrates that the Project and its circumstances would not result in any exceptions identified in CEQA Guidelines Section 15300.2.

1.2. DOCUMENT ORGANIZATION

This Class 32 Exemption Justification includes the following sections:

Section 1. Introduction. Provides information about CEQA, its requirements for environmental review, and explains the exemption justification memo that evaluates the potential impacts of the proposed Project on the physical environment.

Section 2. Environmental Setting. Provides information about the proposed Project's location, the Project site, and background.

Section 3. Project Description. Includes a description of the proposed Project's physical features and construction and operational characteristics, as well as anticipated approvals and permits needed for implementation of the proposed Project.

Section 4. Class 32 Infill Exemption Requirements. Includes the Exemption Justification and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment against the Class 32 exemption requirements.

Section 5. References. Provides a list of sources used throughout the document supporting its conclusions.

2. ENVIRONMENTAL SETTING

2.1. PROJECT LOCATION

The Project site is situated in the eastern portion of the City of Costa Mesa within Orange County, adjacent to the jurisdictional boundary of Costa Mesa and Newport Beach. The Project is located north of Tustin Avenue and east of 21st Street at 396 East 21st Street. Regional access to the site is provided via State Route 55 (SR-55), SR-73, and Interstate 405 (I-405). Local access to the Project site is provided via East 21st Street and Tustin Avenue. The Project site and the surrounding area are shown in Figure 2-1, *Regional Location*, and Figure 2-2, *Local Vicinity*.

2.2. EXISTING LAND USE

The Project site encompasses approximately 1.49 acres (gross and net), inclusive of one parcel identified by Assessor's Parcel Number (APN) 426-171-23. The Project site was previously developed as a mobile home park and is predominantly disturbed. The Project site is currently vacant and undeveloped, and utilities are capped off. The site contains vegetation limited to non-native grasses and shrubs. The entire site is enclosed by an existing chain-link fence as well as a concrete block wall that encloses the majority of the Project site, except for two access points, one along East 21st Street and the other along Tustin Avenue. Existing conditions of the Project site and adjacent uses are shown in Figure 2-3, *Project Aerial*, and Figures 2-4a and 2-4b, *Existing Site Photos*.

2.3. EXISTING GENERAL PLAN LAND USE AND ZONING DESIGNATIONS

The Project site is designated as Medium Density Residential (12 dwelling units per acre) by the City of Costa Mesa General Plan and is zoned as Multiple-Family Residential, Medium Density (R2-MD) by the City of Costa Mesa Zoning Code, as shown on Figure 2-5, *Existing Land Use Designation*, and Figure 2-6, *Existing Zoning*. The Medium Density Residential land use designation is intended to support single- and multi-family developments with a density of up to 12 dwelling units per acre (du/ac). The R2-MD zoning designation allows for the development of multi-family rental as well as ownership properties on lots with a minimum size of 12,000 square feet (SF). The maximum density allowed is 3,630 SF per dwelling unit, which equals 12 du/ac. In addition, small lot subdivisions are a permitted use on properties zoned R2-MD. The use of the small lot subdivision applies to all new residential small lot subdivisions of 15 lots or less in multi-family zones. Based on the existing land use and zoning designation allowing up to 12 du/ac, the 1.49-acre Project site could accommodate up to approximately 17.88 dwelling units (1.49 acres x 12du/ac), rounded up to 18 base units. Pursuant to California Government Code Section 65915(b)(1)(A), a housing development project that provides at least 5percent of the base units for very-low-income, deed-restricted, for-sale households qualifies for a 20 percent density bonus. For the proposed Project, this would require the provision of 1 very low-income unit (18 base units x 5 percent = 0.9 units, rounded up to 1 unit) and would permit an increase of 4 units above the base density (18 base units x 20 percent = 3.6 units, rounded up to 4 units). Accordingly, the Project site could accommodate up to 22 dwelling units pursuant to California Government Code Section 65915.

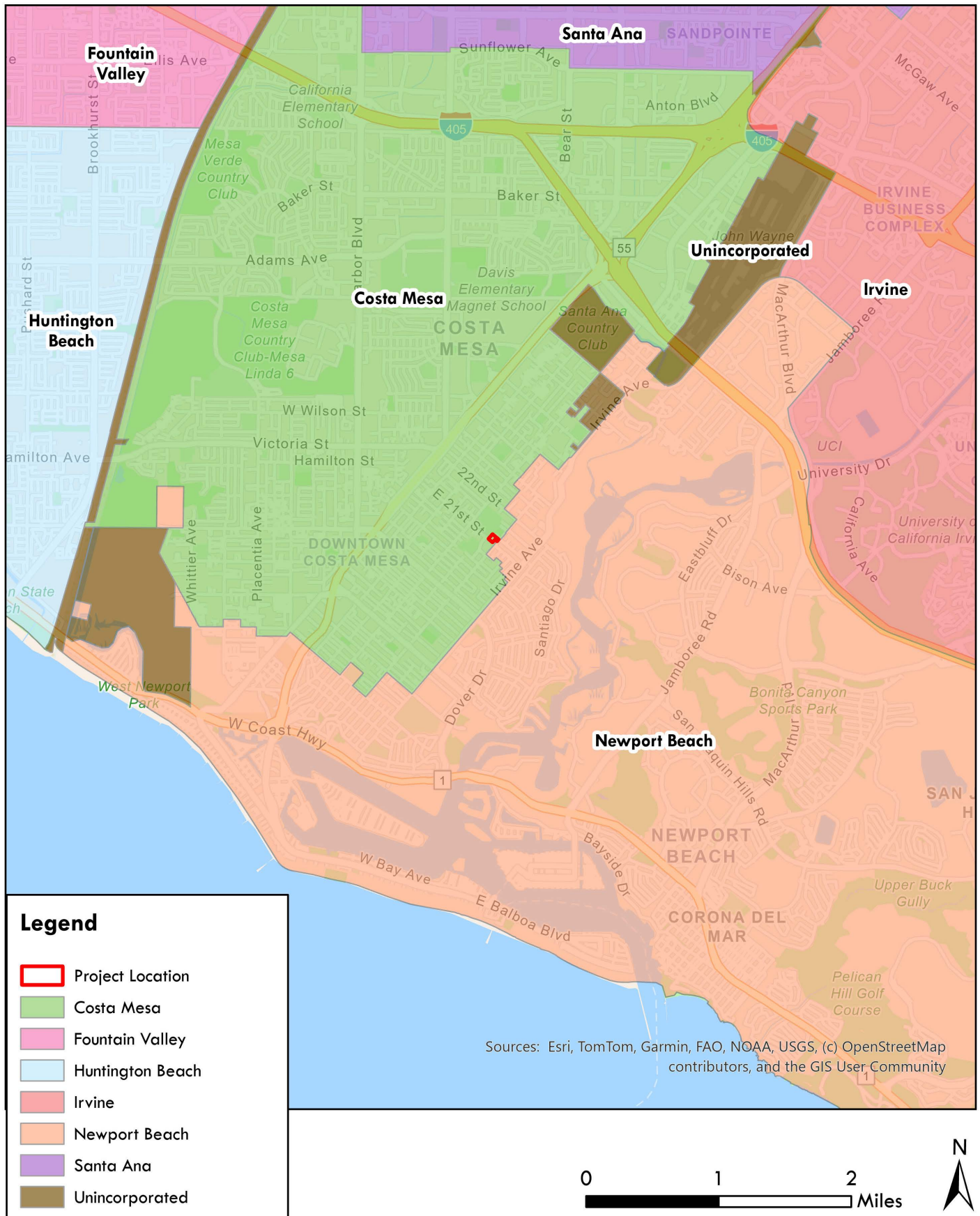
2.4. SURROUNDING LAND USES

The surrounding land uses are described in Table 2-1 along with the General Plan land use and zoning designations.

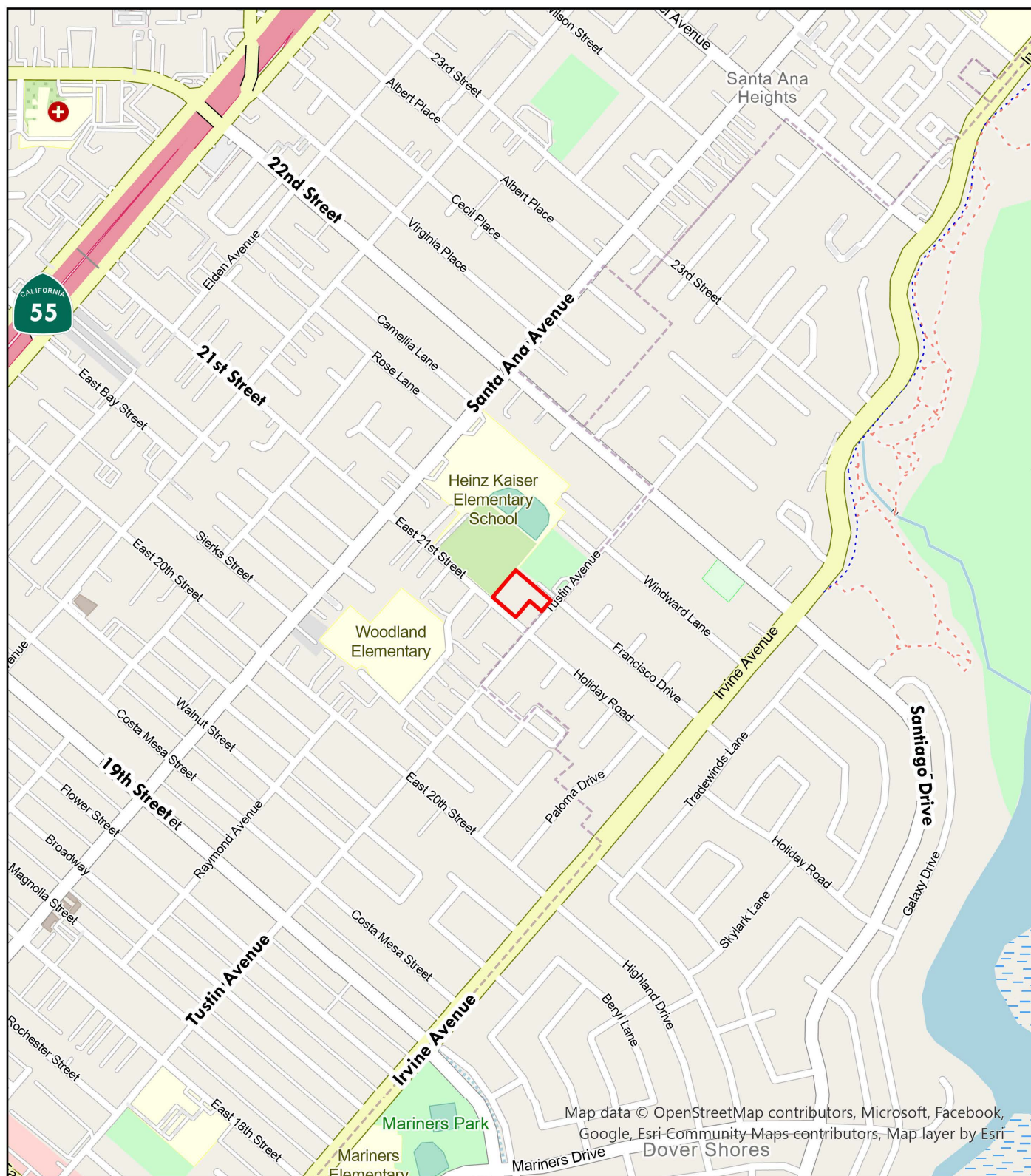
Table 2-1: Surrounding Existing Land Use and Zoning Designations

Direction	Existing Use	General Plan Land Use	Zoning
North	Multi-family residential land uses	Medium Density Residential	Multiple-Family Residential, Medium Density (R2-MD)
East	Tustin Avenue followed by single-family residential land uses	Single-Unit Residential Detached	Single-Unit Residential (R-1)
South	East 21 st Street followed by multi-family residential land uses	Medium Density Residential	R2-MD
West	Sports park	Public/Institutional	Institutional and Recreational District

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Legend

Project Boundary

0 0.15 0.3
Miles



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Legend

 Project Boundary

0 100 200
US Feet



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Legend

- Project Boundary
- Photo Location



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Photo 1: View of Project site facing northeast.



Photo 2: View of eastern portion of Project site facing northeast.

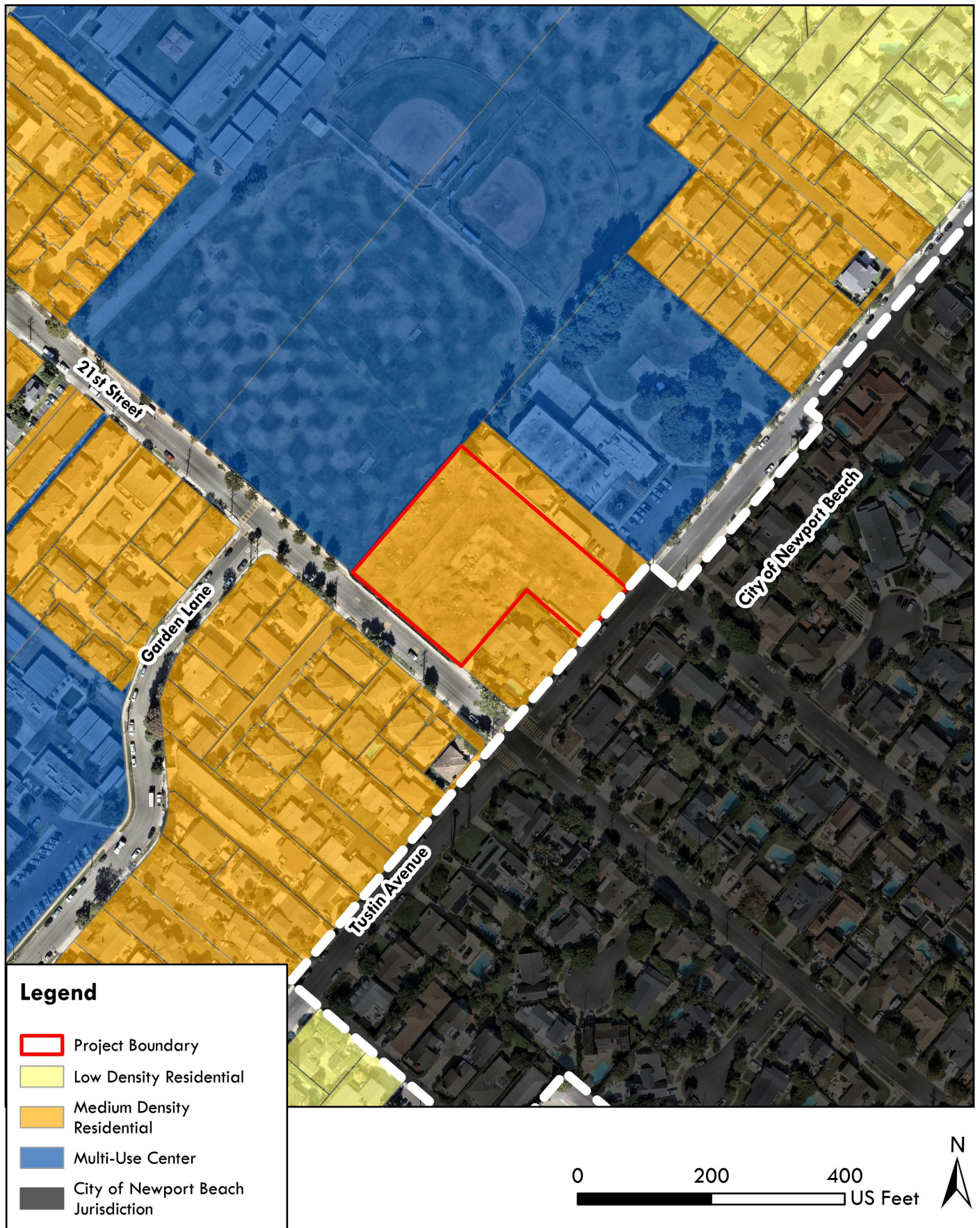


Photo 3: View of northeastern portion of Project site facing northeast.

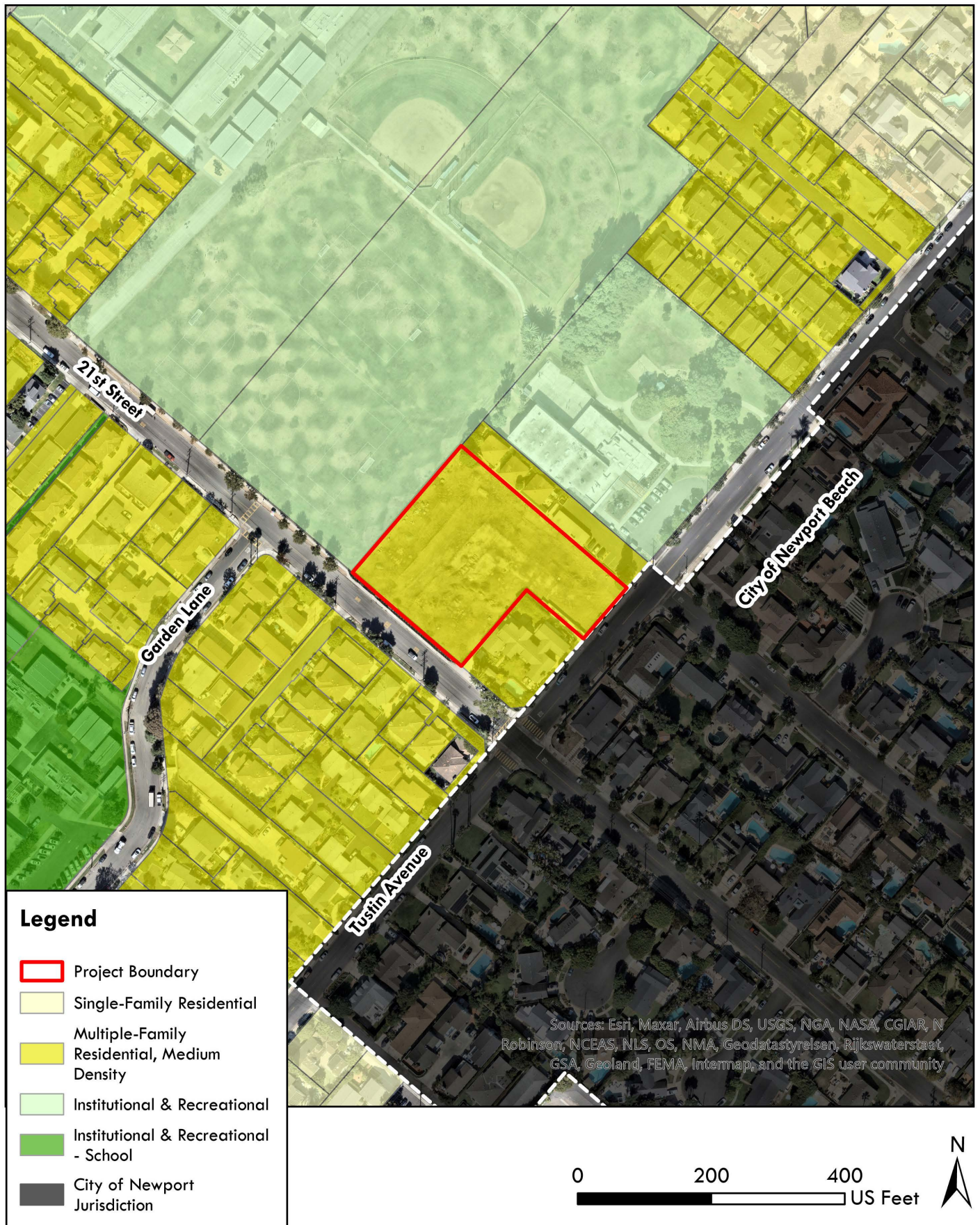


Photo 4: View of western portion of Project site facing northwest.

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3. PROJECT DESCRIPTION

3.1. PROJECT OVERVIEW

The Project applicant proposes to subdivide the 1.49-acre site and develop 21 single-family lots, consisting of 21 detached units. The proposed Project would also include associated improvements such as landscaping, parking, a private roadway, common and private open space areas, and utility and stormwater infrastructure. Figure 3-1, *Conceptual Site Plan*, illustrates the Project as proposed. The proposed Project requires approval of a Tentative Tract Map (TTM) and Design Review from the City of Costa Mesa.

3.2. PROJECT FEATURES

Development Summary

The proposed Project would construct 21 single-family detached residential units on the 1.49-acre site, which would result in a density of 14.1 du/acre. The proposed Project would include 20 market rate units (including 18 base units and 2 density bonus units) and one for sale, deed restricted, very low-income household. The inclusion of the affordable unit qualifies the proposed Project for a density bonus under California's Density Bonus Law (Government Code Section 65915), which is described in further detail under Section 3.3, *Density Bonus Law*, below. These benefits would include a 20 percent density bonus, development standard waivers or reductions, one concession/incentive, and the use of State Density Bonus parking ratios as permitted under the City's implementing ordinance (City of Costa Mesa Municipal Code Title 13, Chapter IX, Article 4, *Density Bonuses and Other Incentives*).

Four residential plan types are proposed, ranging in size from approximately 1,786 square feet (SF) to 2,182 SF, with up to four bedrooms and up to three and a half bathrooms per unit. Lot sizes within the Project site would range from approximately 2,771 SF to 5,725 SF. Each primary residence would include a two-car garage. The proposed residences would be two stories with a maximum height of 31 feet, measured from finish grade to top of highest roof ridges, with minimum building separations of six feet. Residential units would include a minimum 3-foot front setback, 3-foot side setback, 5-foot street side setback, and 5-foot rear yard setback. A summary of each proposed residential lot is provided below in Table 3-1.

Table 3-1: Residential Unit Summary

Unit Type (Plan)	No. of Units	Bedrooms	Bath	Unit (SF)	Porch (SF)
1	4	3	2.5	1,786	9
2	7	3	2.5	1,966	21
3	8	4	3.5	2,182	6
4	2	3	1	908	0

Architectural Summary

The proposed residences would feature a modern, minimalist architectural style defined by simple gabled forms, strong vertical lines, and a cohesive blend of contemporary exterior materials. The building

elevations would incorporate composite asphalt shingle roofing, smooth stucco, vertical wood-like siding, metal awnings, and metal roll-up garage doors, consistent with the Project's materials palette.

The architectural design would include multiple color schemes to introduce variation while maintaining a unified neighborhood character. These schemes would range from light, neutral tones to darker, more saturated hues. Lighter façades would include white and soft gray siding paired with contrasting trim and accent elements, while darker schemes would incorporate deep charcoal or blackened vertical siding to create visual contrast across the streetscape. Warm, natural wood-like tones would also be used to soften the overall composition and complement the modern building forms.

Variations in color, window placement, and façade articulation would help distinguish individual units while preserving a consistent architectural language throughout the project. Conceptual renderings and elevation drawings illustrating the proposed materials, color schemes, and overall appearance of the residences are provided in Appendix A, *Conceptual Elevations*.

Parking and Access

Access to the Project site would be provided via two driveways, including a 25-foot-wide driveway along Tustin Avenue and a 25-foot-wide driveway along East 21st Street. Internal circulation throughout the site would be accommodated by a 25-foot-wide private roadway that would provide two-way vehicle access to all on-site residences and parking areas, as well as accommodate emergency vehicle access.

As shown in Figure 3-1, *Conceptual Site Plan*, the proposed Project would provide a total of 60 parking spaces, consisting of 42 garage spaces and 18 surface parking spaces. Garage parking would be provided within enclosed structures, and surface parking would be distributed throughout the site for convenient access to the residences. The proposed circulation system would also include pedestrian pathways to ensure safe movement throughout the site and connectivity to adjacent off-site areas.

Fencing and Walls

The proposed Project would include installation of new fencing to provide privacy and delineation between residences and roadways. A 6-foot-high steel privacy fence and gate would be installed to separate individual residences from adjacent internal and external roadways. In addition, a 30-inch-high contemporary picket fence and gate would be installed to separate private residential areas within the site.

The existing block wall surrounding the site would remain in place, except for portions along the southern and eastern perimeters adjacent to East 21st Street and Tustin Avenue, where sections would be removed or modified to accommodate new driveways and improvements.

Landscaping and Open Space

The proposed Project would include the installation of drought-tolerant landscaping throughout the site, incorporating a variety of trees, shrubs, and groundcovers to enhance the overall visual character. Approximately 36 trees and 1,551 shrubs would be planted across the Project site, providing shade, visual screening, and aesthetic value. Trees and shrubs would be strategically distributed along the perimeter of the site, adjacent to internal roadways, and within common open space areas to create a cohesive and water-efficient landscape design.

The proposed Project would provide a total of approximately 9,889 SF of private open space (15.2 percent of the site area) distributed among individual residential units. Additionally, the proposed Project would include approximately 9,291 SF of common open space, including approximately 7,288 SF of landscaped open space and approximately 2,003 SF of hardscaped areas designed for resident use and circulation. As such, the total open space provided would be approximately 19,180 SF. Figure 3-2, *Conceptual Landscape Plan*, illustrates the site's landscape plan as proposed.

Photovoltaic (PV) Solar

Consistent with the 2025 California Energy Code (Title 24 Part 6), the proposed Project would include photovoltaic (PV) solar panels on the rooftops of each residence and meet all other Title 24 Part 6 requirements related to energy efficiency and low impact development (LID) standards.

Infrastructure Improvements

Lighting

Proposed outdoor lighting would be typical of single-family residential uses and would consist of wall-mounted lighting and pole-mounted lights along the proposed internal roadway. The proposed Project's outdoor lighting would be directed downward and shielded to minimize off-site and would be designed in compliance with the provisions of City of Costa Mesa Municipal Code (CMMC) Title 20, Chapter II Section 20-6 (*Property Maintenance Standards*).

Gas and Electric

The proposed Project would be serviced by Southern California Edison (SCE). The proposed Project is anticipated to be fully electric; however, if natural gas service is required, it would be provided by Southern California Gas. There is an existing overhead electrical line located on East 21st Street and Tustin Avenue. In addition, an existing 2-inch gas line is located within Tustin Avenue.

Water and Sewer

The proposed Project would install a new water line on-site that would connect to the existing 10-inch and 8-inch water lines in Tustin Avenue and East 21st Street. In addition, the proposed Project would install a new sewer line on-site that would connect to the existing 8-inch sewer line in Tustin Avenue and East 21st Street.

Stormwater Drainage

The proposed Project would include an on-site storm drain system designed to capture stormwater and convey it to an underground infiltration basin located beneath the internal driveway near the East 21st Street driveway. Stormwater collected through area drains and inlets would be directed to this primary facility where minor storm events would be treated and infiltrated.

During larger storm events, overflow would discharge to the adjacent public streets consistent with existing drainage patterns. Off-site runoff would then enter the City of Costa Mesa drainage system, which includes a catch basin located on East 21st Street approximately 450 feet west of the Project site.

Sidewalk, Curb, and Gutter

No street, curb, or gutter improvements are proposed along Tustin Avenue or East 21st Street.

3.3. DENSITY BONUS LAW

The Density Bonus Law (DBL) (California Government Code Section 65915) encourages the development of affordable housing by allowing qualifying housing projects to exceed the otherwise applicable residential density permitted by a jurisdiction's General Plan and zoning regulations. Projects that provide qualifying affordable units may also be eligible for incentives, concessions, waivers, or reductions in development standards, including setbacks and parking requirements, as provided under State law. Pursuant to Government Code Section 65915, qualifying incentives, concessions, and waivers are required to be granted unless specific statutory findings can be made by the local agency.

In addition, Government Code Sections 65915 and 65589.5 provide that the granting of a density bonus, incentive, concession, waiver, or reduction in development standards shall not, in and of itself, require a General Plan amendment, zoning change, or other discretionary approval, nor serve as the basis for determining that a housing development project is inconsistent with applicable local land use regulations.

The Project site is designated as Medium Density Residential by the City of Costa Mesa General Plan and is zoned as R2-MD by the City of Costa Mesa Zoning Code. As mentioned previously, the proposed Project would result in approximately 14.1 du/acre which is above the allowed maximum density for the site of 12 du/ac. However, the Applicant has requested a density bonus consistent with State law for affordable housing to allow for the development of additional units. Pursuant to the State Density Bonus Law, the proposed Project would be permitted to exceed the maximum base density. The proposed Project includes one for sale very-low-income household, representing 5 percent of the base density of 18 units. Based on this level of affordability, the proposed Project qualifies for a density bonus of 20 percent, or 3.6 units ($18 \text{ units} \times 0.20 = 3.6 \text{ units}$), which is rounded up to four additional units in accordance with State law. Accordingly, the proposed density is consistent with the City's General Plan and zoning as modified by applicable State Density Bonus provisions. State law allows the City to approve an increase in density for qualifying affordable housing projects without requiring a General Plan Amendment or Zone Change.

3.4. CONSTRUCTION

Construction activities for the proposed Project would occur over three phases, lasting approximately 15 months in total. For analysis purposes only, it is anticipated that construction activities would begin the second quarter of 2026. The construction schedule is provided for analytical purposes only to evaluate a representative worst-case construction scenario and does not represent a required or fixed construction timeline for the proposed Project. Construction would occur in the following stages: (1) site preparation; (2) grading; (3) building construction; (4) paving; and (5) architectural coatings. Construction activities would be limited to Monday through Friday from 7:00 AM to 7:00 PM and on Saturdays from 9:00 AM to 6:00 PM. Construction is prohibited on Sundays and federal holidays including New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day, pursuant to CMMC Section 13-279. The proposed Project is anticipated to allow initial residential occupancy in the third quarter of 2027, with full construction and buildout of all units occurring thereafter in accordance with the overall

construction schedule. Grading for construction of the proposed Project is anticipated to be balanced on-site with no soil import or export.

3.5. OPERATIONS

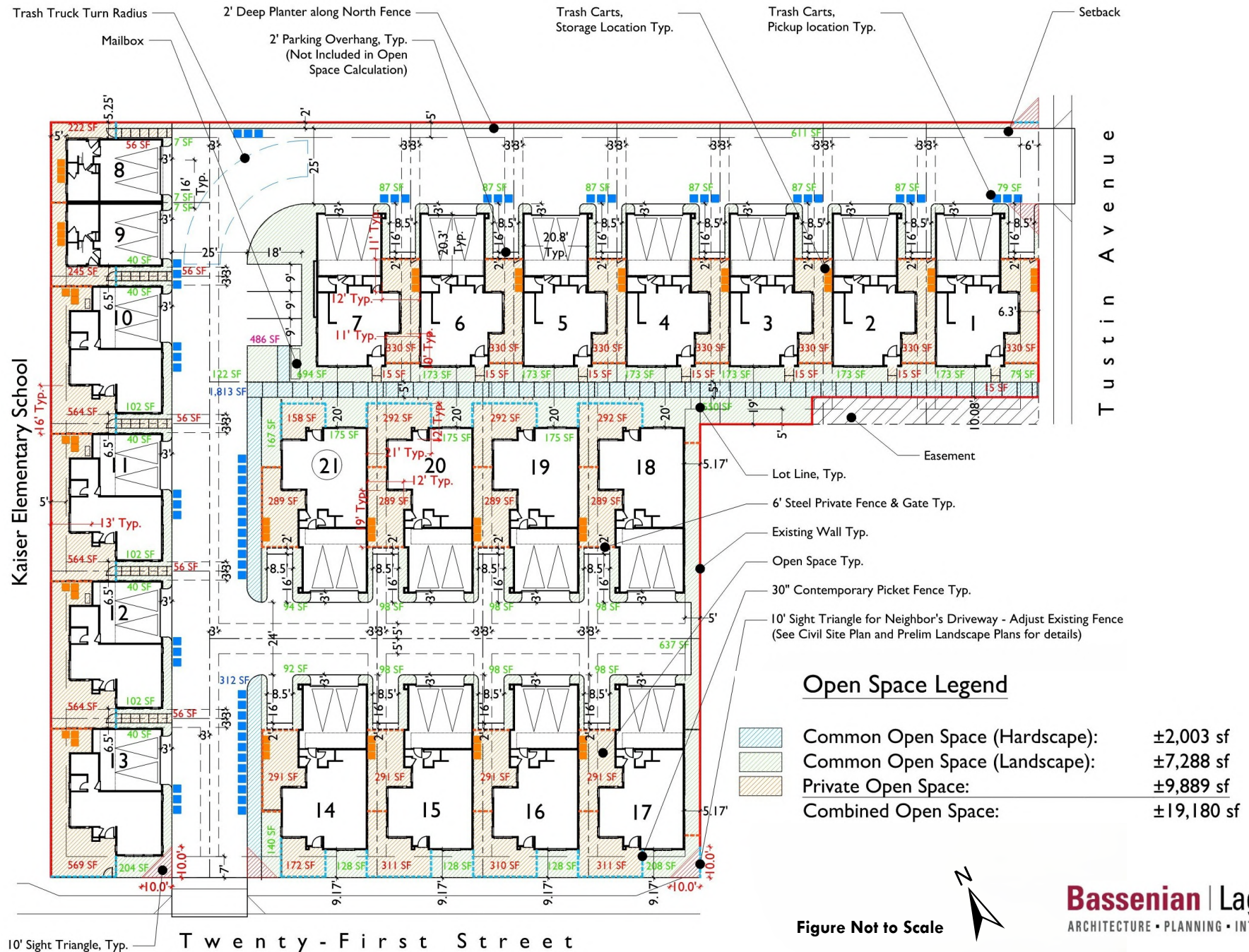
Upon completion, the proposed Project would operate as a privately managed residential community consisting of 21 single-family detached homes. The residences would be individually owned, with ongoing maintenance of common areas, including private driveways, guest parking, shared landscaping, and stormwater facilities, conducted by a homeowners' association (HOA). Residential operations would be typical of low- to medium-density urban housing and would include standard activities such as vehicle ingress/egress, waste collection, landscaping maintenance, and utility usage.

3.6. DISCRETIONARY ACTION CHECKLIST

In accordance with CEQA Guidelines Sections 15050 and 15367, the City of Costa Mesa is the designated Lead Agency for the Project and has principal authority and jurisdiction for CEQA actions and Project approval. The following discretionary approvals, permits, and studies are anticipated to be necessary from the City for implementation of the proposed Project:

- Approval of Tentative Tract Map (TTM)
- Approval of Design Review
- Approval of Density Bonus Request
- Approvals and permits necessary to execute the proposed Project, including but not limited to, grading permit, building permits, etc.

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4. CLASS 32 INFILL EXEMPTION REQUIREMENTS

Article 19 of the California Environmental Quality Act (CEQA Guidelines Sections 15300 to 15333), includes a list of classes of projects that have been determined to not have a significant effect on the environment and as a result, are exempt from review under CEQA.

Class 32 Infill Exemption

One of the classes of projects exempt from CEQA review are projects that are specified as urban infill development. CEQA Guidelines Section 15332 defines the Class 32 Infill Exemption as a project that meets the following five requirements:

- a) **General Plan and Zoning Consistency:** The project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.
- b) **Project Location, Size, and Context:** The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses.
- c) **Endangered, Rare, or Threatened Species:** The project site has no value as habitat for endangered, rare, or threatened species.
- d) **Significant Effects:** Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- e) **Utilities:** The site can be adequately served by all required utilities and public services.

Exceptions

In addition to meeting the five requirements stated above, the CEQA Guidelines Section 15300.2 provides specific instances where exceptions apply to a project that would otherwise meet the requirements for an exemption. These exceptions are:

- a) **Location:** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located. A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, State, or local agencies.
- b) **Cumulative Impact:** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- c) **Significant Effects:** A Categorical Exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- d) **Scenic Highways:** A Categorical Exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- e) **Hazardous Waste Sites:** A Categorical Exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

- f) **Historical Resources:** A Categorical Exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

4.1. PROPOSED PROJECT CEQA EXEMPTION

The analysis below provides substantial evidence that the proposed Project properly qualifies for an exemption under CEQA Guidelines Section 15332 (i.e., Class 32) and, as a result, would not have a significant effect on the environment. Additionally, the analysis shows there are no exceptions to qualifying for the Categorical Exemption, as identified in CEQA Guidelines Section 15300.2 and discussed in the following Section 4.2, *Exceptions for Exemptions*.

a. Criterion Section 15332(a): General Plan and Zoning Consistency: The Project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.

As described above, the proposed Project is designated Medium Density Residential (12 du/ac) by the City of Costa Mesa General Plan and is zoned as Multiple-Family Residential, Medium Density (R2-MD) by the City of Costa Mesa Zoning Code. The General Plan states that the Medium Density Residential land use designation is intended to support single-and multi-family developments with a density of up to 12 du/ac. The R2-MD zoning designation allows for the development of multi-family rental as well as ownership properties on lots with a minimum size of 12,000 SF. The maximum density allowed is 3,630 SF per dwelling unit, which equals 12 du/ac. In addition, small subdivisions are a permitted use on properties zoned R2-MD. The use of the small lot subdivision applies to all new residential small lot subdivisions of 15 lots or less in multi-family zones.

The proposed Project consists of a 21-lot subdivision, which would include 20 market rate single-family detached units, and one single family unit for very low-income household, as permitted under the State Density Bonus Law and the City's implementing ordinance (City of Costa Mesa Municipal Code Title 13, Chapter IX, Article 4, *Density Bonuses and Other Incentives*). The provision of one for sale very low-income unit (representing 5 percent of the proposed Project) allows the applicant to receive a 20 percent density bonus of the base units, which increases the proposed Project from the base allowable 18 units (calculated under the Medium Density Residential designation, 1.49 acres x 12 du/acre) to a total of 22 units (18 base units x 20 percent = 3.6 bonus units, rounded up to 4 additional units). The proposed Project's density, including the additional units achieved through the application of a density bonus, is consistent with the City's adopted housing policies and the density range identified in the General Plan.

While the Project proposes a series of waivers and reductions from the development standards outlined in the Zoning Code (CMMC Title 13, Chapter V, Article 2.5, *Residential Small Lot Subdivisions*, and Table 13-42, *Small Lot Subdivisions Standards*), these modifications are authorized by the Density Bonus Law (Government Code Section 65915), and CMMC Title 13, Chapter IX, Article 4. Such waivers are not considered deviations that would render the proposed Project inconsistent with the General Plan or zoning regulations but rather are expressly permitted adjustments that facilitate the construction of affordable housing consistent with State housing policy. Therefore, despite the proposed Project's request for relief from certain site development standards (such as maximum number of lots, building height, and private open space), the proposed Project remains fully consistent with the land use designation and zoning regulations as modified by applicable State housing provisions.

Table 4-1 shows the proposed Project's consistency with the City of Costa Mesa Zoning Ordinance for Small Lot Subdivision development standards as listed in Table 13-42 of the CMMC. As shown, the proposed Project would meet all of the requisite development standards, including lot size, setback, open space, and parking requirements, with the modifications authorized by the Density Bonus Law and CMMC Title 13, Chapter IX, Article. Therefore, the proposed Project would be consistent with the applicable zoning regulations.

Overall, the proposed Project would be consistent with the applicable General Plan and zoning regulations and meets the criteria for CEQA Guidelines Section 15332(a).

Table 4-1: City of Costa Mesa Zoning Development Standards for Small Lot Subdivisions (Municipal Code Article 2.5)

Development Feature	M Zoning Requirement	Waiver	Proposed Project Consistency
Number of Lots ¹	Maximum of 15 lots	Yes	Consistent. The proposed Project consists of a 21-lot subdivision. Pursuant to California Government Code Section 65915 and the CMMC Title 13, Chapter IX, Article 4 (<i>Density Bonuses and Other Incentives</i>), qualifying housing developments that provide affordable housing units are eligible for density bonuses and other incentives intended to facilitate the development of affordable housing. Specifically, CCMC Title 13, Chapter IX, Article 4 states that the purpose of the article is to provide density bonus, concessions, and incentives for the production of affordable housing in compliance with State Density Bonus Law. The proposed Project includes affordable units and qualifies for a density bonus, concessions, and incentives pursuant to Government Code Section 65915 and CMMC Title 13, Chapter IX, Article 4. As such, the proposed increase in the number of lots is consistent with the provisions of State Density Bonus Law and the City's implementing density bonus regulations contained in CMMC Title 13, Chapter IX, Article 4.
Minimum Setbacks ²	Front yard: 20 ft Interior side yard: 5 ft Interior Rear yard: 15 ft Side street: 10 ft	Yes (except for side yard interior setback)	Consistent. The proposed Project would provide building separations of at least 6 feet, 4 inches. Lots 8 and 9 would include a minimum building separation of 6 inches. In addition,

Development Feature	M Zoning Requirement	Waiver	Proposed Project Consistency
			the residential structure along Tustin Avenue would provide a minimum front setback of 6 feet; the interior side yard units would provide a minimum 5-foot side setback; and street side units would provide up to a minimum 7-foot street side setback, as shown in Figure 3-1, <i>Conceptual Site Plan</i>. Therefore, the proposed Project would comply with the interior side yard setback, except for the front, rear, and side street setback. However, as described above, the proposed Project qualifies for a density bonus and associated incentives, concessions, waivers, and/or reductions of development standards pursuant to California Government Code Section 65915 and CMMC Title 13, Chapter IX, Article 4. As such, the reduced minimum front, rear, and side street yard setback is consistent with the provisions of the State Density Bonus Law and the City's implementing density bonus regulations contained in CMMC Title 13, Chapter IX, Article 4.
Distance Between Buildings ²	6 feet minimum	Yes	Consistent. The Density Bonus Waiver is limited to the minimum separation between the residential units on Lots 8 and 9, which is proposed at six inches. The remaining residential units provide a minimum separation of 6'-4" between buildings.
Maximum Building Height and Stories ²	Maximum 2 stories and 27 feet	Yes	Consistent. The proposed residences would be two stories with a maximum height of 31 feet, measured from finish grade to top of highest roof ridges. However, as described above, the proposed Project qualifies for a density bonus and associated incentives, concessions, waivers, and/or reductions of development standards pursuant to California Government Code Section 65915

Development Feature	M Zoning Requirement	Waiver	Proposed Project Consistency
			and CMMC Title 13, Chapter IX, Article 4. As such, the increased building height is consistent with the provisions of the State Density Bonus Law and the City's implementing density bonus regulations contained in CMMC Title 13, Chapter IX, Article 4.
Minimum Private Open Space ²	200 SF per unit, no dimension less than 10 feet	Yes	Consistent. The proposed Project would provide a total of approximately 9,863 SF of private open space (15.2 percent of the site area) distributed among individual residential units. This is equivalent to 470 SF of private open space per lot. The private open spaces will contain a minimum dimension of five feet. However, as described above, the proposed Project qualifies for a density bonus and associated incentives, concessions, waivers, and/or reductions of development standards pursuant to California Government Code Section 65915 and CMMC Title 13, Chapter IX, Article 4. As such, the reduced dimension is consistent with the provisions of the State Density Bonus Law and the City's implementing density bonus regulations contained in CMMC Title 13, Chapter IX, Article 4.
Minimum Total Open Space ²	35 percent of total lot	Yes	Consistent. The proposed Project would provide a total of approximately 9,863 SF of private open space (15.2 percent of the site area) distributed among individual residential units. Additionally, the proposed Project would include approximately 9,291 SF of common open space, including approximately 7,288 SF of landscaped open space and approximately 2,003 SF of hardscaped areas designed for resident use and circulation. As such, the total open space provided

Development Feature	M Zoning Requirement	Waiver	Proposed Project Consistency
			would be approximately 19,180 SF (29.5 percent of the site area). However, as described above, the proposed Project qualifies for a density bonus and associated incentives, concessions, waivers, and/or reductions of development standards pursuant to California Government Code Section 65915 and CMMC Title 13, Chapter IX, Article 4. As such, the reduced open space is consistent with the provisions of the State Density Bonus Law and the City's implementing density bonus regulations contained in CMMC Title 13, Chapter IX, Article 4.
Allowed Density ²	Maximum Base Density: 18 du (1.49 acres × 12 du/acre = 17.88 units, rounded up to 18 units) Density Bonus: 20 percent density bonus pursuant to State Density Bonus Law (18 base units × 20 percent = 3.6 units, rounded up to 4 additional units), resulting in a maximum allowable density of 22 units.	None	Consistent. The proposed Project would construct 21 single-family detached residential units on the 1.49-acre site, which would result in a density of 14.1 du/acre. The proposed Project would include 20 market rate units (including 18 base units and 2 density bonus unit) and one very low-income household. The inclusion of the affordable units qualifies the proposed Project for a density bonus under California's Density Bonus Law (Government Code Section 65915) and awards the proposed Project a 20 percent bonus, equivalent to 4 additional units for the Project site.
Parking ^{2,3}	Small Lot Subdivision Standards: Three bedroom or more units - 2 garage spaces and 2 open parking spaces. Required: 76	None	Consistent. The proposed Project would provide a total of 60 parking spaces, consisting of 42 garage spaces and 18 surface parking spaces. California's State Density Bonus law allows reduced parking ratios that override local parking codes, and do

Development Feature	M Zoning Requirement	Waiver	Proposed Project Consistency
	Government Code Section 65915(p)(1): 2 or 3 bedrooms: 1.5 spaces 4 bedrooms: 2.5 spaces Required: 37 (3-bedroom units: 1.5 spaces × 13 units = 19.5 spaces) (4-bedroom units: 2.5 spaces × 8 units = 20 spaces)		not require a waiver, concession, or discretionary approval. These are predefined, by-right reduced parking standards that apply automatically when a project qualifies under State Density Bonus law. As such, the proposed parking is consistent with the provisions of the State Density Bonus Law and the City's implementing regulations.
Landscaping ⁴	One tree shall be provided for every 200 square feet of landscaped area. Required: 36	None	Consistent. The proposed Project would include the installation of drought-tolerant landscaping throughout the site, incorporating a variety of trees, shrubs, and groundcovers to enhance the overall visual character. Approximately 36 trees and 1,551 shrubs would be planted across the Project site, providing shade, visual screening, and aesthetic value. Trees and shrubs would be strategically distributed along the perimeter of the site, adjacent to internal roadways, and within common open space areas to create a cohesive and water-efficient landscape design.

Notes:

1. Municipal Code Section 13-42.3, *Development Standards and Requirements*2. Municipal Code Table 13-42, *Small Lot Subdivision Standards*

3. Government Code Section 65915(p)(1)

4. Municipal Code Section 13-105, *Required Landscape Materials*

Source: (City of Costa Mesa, 2026)

b. Criterion Section 15332(b): Project Location, Size, and Context: The proposed development occurs within City limits on a Project site of no more than 5 acres substantially surrounded by urban uses.

The proposed Project is within the limits of the City of Costa Mesa on a 1.49-acre site located north of Tustin Avenue and east of 21st Street at 396 East 21st Street. The Project site is bordered by institutional and multi-family residential uses to the north, a roadway and single-family residential uses to the east, a roadway and multi-family residential uses to the south, and recreational uses to the west, as shown on Figure 2-2, *Local Vicinity*. As the Project site is less than 5 acres and substantially surrounded by urban uses, it meets the criteria of CEQA Guidelines Section 15332(b).

c. Criterion Section 15332(c): Endangered, Rare, or Threatened Species: The Project site was determined to have no value as habitat for endangered, rare or threatened species.

The Project site was previously developed as a mobile home park and has since been graded, resulting in predominantly disturbed conditions. The site is currently vacant and undeveloped, and utilities are capped off. As shown in Figure 2-4b, *Existing Site Photos*, the site heavily disturbed and contains vegetation limited to non-native grasses and shrubs. The entire site is enclosed by an existing chain-link fence as well as a concrete block wall that encloses the majority of the Project site, except for two access points, one along East 21st Street and the other along Tustin Avenue.

As such, the site is currently vacant, has been significantly disturbed by previous development activities, and does not support native habitat. It is primarily characterized by disturbed ground and non-native grasses and shrubs. Furthermore, the site is located within a fully urbanized area and is surrounded by institutional and multi-family residential uses to the north, a roadway and single-family residential uses to the east, a roadway and multi-family residential uses to the south, and recreational uses to the west. Given the disturbed condition of the site and lack of native vegetation, the Project site does not contain suitable habitat for endangered, rare, or threatened species. However, the Project site does include some non-native grasses and shrubs that have the potential to provide habitat for nesting migratory birds. Therefore, the Applicant would be required to comply with Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA). Compliance with the California Fish and Game Code and MBTA would ensure that impacts to nesting birds and raptors which may use vegetation, including existing scattered ornamental vegetation on or near the Project site for nesting, during construction would not occur. Accordingly, implementation of the proposed Project would not have a significant effect on the habitat of endangered, rare, or threatened species and therefore satisfies the applicable criteria of CEQA Guidelines Section 15332(c).

d. Criterion Section 15332(d): Significant Effects: Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts, aiming to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3, *Determining the Significance of Transportation Impacts*, was added to the CEQA Guidelines which states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and shall apply statewide beginning on July 1, 2020.

VMT Screening Criteria

The City of Costa Mesa is the Lead Agency responsible for identifying potential impacts associated with the development of the proposed Project in accordance with CEQA requirements. In evaluating transportation impacts, the City utilizes the *City of Costa Mesa Transportation Impact Analysis Guidelines* (May 2020) ("City TIA Guidelines"), which identify certain types of projects that, due to their size, nature, or location, are presumed to result in a less-than-significant VMT impact and may be screened from further

analysis (Fehr and Peers, 2020). The City TIA Guidelines establish screening thresholds for certain types of projects that may be presumed to cause a less-than-significant VMT impact based on substantial evidence provided in the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA*. The City TIA Guidelines specify the following screening thresholds: Transit Priority Area (TPA) Screening, Low VMT Area Screening, and Project Type Screening. If a project meets one of the screening criteria described below, then the VMT impact of the proposed Project would be considered less than significant and no further analysis of VMT would be required.

- **Low VMT Area Screening:** Projects located in low VMT areas utilizing the Orange County Traffic Analysis Model (OCTAM) travel demand forecast.
- **Project Type Screening:** The local serving retail component of the project is less than 50,000 SF of gross floor area. Additionally, screening would apply to projects which generate fewer than 110 daily net new vehicle trips.
- **TPA Screening:** Project is located within a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor, and meets FAR, parking, RTP/SCS consistency, and replacement housing considerations.

VMT Screening Analysis

A VMT Analysis Screening Memo was prepared for the proposed Project by EPD Solutions Inc., in November 2025 (Appendix B) to determine the applicability of the City of Costa Mesa TIA Guidelines. The proposed Project trip generation was calculated using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 12th Edition* (2025). Twenty-one residential units were analyzed using the Single Family Detached Residential land use code (ITE Land Use Code 210) for the proposed Project. As shown in Table 4-2 below, the proposed Project would generate 191 net daily trips, 15 AM peak hour trips, and 19 PM peak hour trips. As such, the proposed Project would not qualify for Project Type Screening as it exceeds the 110 daily net new vehicle trips threshold. Furthermore, as shown in Figure 2 within Appendix B, the proposed Project is not located within a TPA and therefore would not meet the requirements for TPA Screening.

As detailed in the VMT Analysis Screening Memo included as Appendix B, the City TIA Guidelines use the OCTAM travel demand forecast to determine if a project is located in a low VMT generating area. As shown in Figure 2 within Appendix B, the Project site is located in a “Low VMT Zone,” an area that is less than 15 percent below the VMT average of the city. Therefore, the proposed Project satisfies the City’s VMT Screening Criteria for Low VMT Area Screening. This conclusion is supported by the SCAG *Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy*, which promotes higher-density residential development in transit-served, walkable urban areas, encouraging shorter and fewer vehicle trips through access to local services and transit. In accordance with the City’s adopted VMT thresholds and guidance, projects located in low VMT areas are presumed to result in a less-than-significant VMT impact.

The proposed Project would not result in any significant effects relating to traffic; therefore, the proposed Project meets the traffic-related criteria of CEQA Guidelines Section 15332(d).

Table 4-2: Proposed Project Trip Generation

Land Use (ITE Code)	Quantity	AM			PM			Daily
		In	Out	Total	In	Out	Total	
Single Family Detached Residential (210)	21	4	11	15	12	7	19	191
Total Project Trip Generation		4	11	15	12	7	19	191

Source: Appendix B

Noise

To support the Class 32 Categorical Exemption findings for the proposed Project, EPD Solutions, Inc. prepared a Noise and Vibration Impact Analysis, dated March 2026 (Appendix C), that evaluates potential noise-related impacts to surrounding land uses resulting from implementation of the proposed Project.

Noise Terminology

Various noise descriptors are utilized in this noise analysis, and are summarized as follows:

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically 1 hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

CNEL: The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 pm to 10:00 pm and after an addition of 10 dBA to noise levels between the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

Ambient Noise: The “ambient noise level” is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

Sensitive Receptor: Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered sensitive receptors. The nearest sensitive receptor to the Project site is the single-family residence located at 398 East 21st Street, southeast of the Project site.

Significance Criteria

As described in more detail in Appendix C, the City’s General Plan guidelines and Municipal Code regulations identify noise compatibility and establish noise standards that are implemented as thresholds. However, the City’s Municipal Code does not establish quantified thresholds for increases to noise volumes and vibration. Thus, the thresholds from the Federal Transportation Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* were used for noise, and Caltrans’ *Transportation and Construction*

Vibration Guidance Manual were used for vibration in this analysis (Appendix C). Table 4-3, *City of Costa Mesa Significance Criteria Summary*, provides a summary of the thresholds used in the noise analysis.

Table 4-3: City of Costa Mesa Significance Criteria Summary

Analysis	Conditions		Significant Criteria	
			Daytime	Nighttime
Operational Cumulative ¹	If ambient is < 60 dBA CNEL		≥ 5 dBA CNEL Project Increase	
	If ambient between 60 and 65 dBA CNEL		≥ 3 dBA CNEL Project Increase	
	If ambient > 65 CNEL		≥ 1.5 dBA CNEL Project Increase	
Operational	Exterior Noise Standards ²	Residential	55 dBA	50 dBA
	Land Use Compatibility ³		Less than 65 dBA CNEL	
Construction	Construction is allowed between 7:00 AM and 7:00 PM Mondays through Fridays, and between 9:00 AM and 6:00 PM on Saturdays. Construction is prohibited on Sundays and the following specified federal holidays: New Year’s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. ²			
	Thresholds (Leq.equip(8hr)) ⁴	Residential	80 dBA	Permit Required
	Vibration Damage Criteria ⁵		0.3 PPV (inches/second) – Older Residential	

1. FICON. (1996). *Federal Agency Review of Selected Airport Noise Analysis Issue*

2. City of Costa Mesa. (2025). *City of Costa Mesa Municipal Code*.

3. City of Costa Mesa. (2006). *City of Costa Mesa Noise Element*.

4. FTA. *Transit Noise and Vibration Impact Assessment Manual*.

5. Caltrans. (2020b). *Transportation and Construction Vibration Guidance Manual*.

Noise Impacts

Construction

Construction of the proposed Project is expected to occur over three phases and last approximately 15 months; however, a conservative estimate of an 11-month single-phase assumption was utilized for modeling purposes. Construction of the proposed Project would involve site preparation, grading, building construction, paving, and architectural coatings. These activities would require the use of heavy equipment that would increase noise levels in the immediate area. However, the noise from construction activity would fluctuate depending on the particular type, number, and duration of use of construction equipment. Based on the Air Quality Impact Analysis prepared for the proposed Project by EPD Solutions, Inc. (Appendix D), it was conservatively assumed that building construction would overlap between paving and architectural coating for a short period of time. Additionally, noise associated with construction of the proposed Project would be temporary in nature and would cease upon completion of the proposed Project. Based on information provided by the applicant, construction activities would not utilize equipment exceeding 80,000 pounds (e.g., large bulldozers). Furthermore, given the size and configuration of the Project site (1.49 acres, L-shaped), the analysis conservatively assumes that the two loudest pieces of equipment during each construction phase would operate simultaneously and be located at the geographic center of the site. As described above, the nearest sensitive receptor to the Project site is the single-family residence located at 398 East 21st.

Street, southeast of the Project site

Table 4-4, below, lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 between the equipment and a noise receptor. As shown, noise levels generated by heavy construction equipment would range from approximately 73.7 dBA to 83.6 dBA when measured at 50 feet. However, there are existing walls between the Project site and the nearest sensitive receptors both to the southeast and the north. With the attenuation from the wall, the noise level would range 68.7 dBA to 78.6 dBA, which would not exceed the FTA threshold of 80 dBA for residential properties.

Table 4-4: Typical Construction Equipment Noise Levels

Activity	Equipment ¹	Maximum Noise Level @ 50 Feet ^{2,3}	Composite Maximum Noise Level @ 50 Feet ^{2,3}	Noise Level with Existing Wall Attenuation @ 50 Feet ^{2,3}
		dBA Lmax	dBA Leq	dBA Leq
Site Preparation	Rubber Tired Dozers	81.7	82.0	77.0
	Crawler Tractors	84.0		
Grading	Graders	85.0	83.6	78.6
	Excavators	80.7		
	Rubber Tired Dozer	81.7		
	Crawler Tractors	84.0		
Building Construction	Forklift	74.7	80.7	75.7
	Generator Sets	80.6		
	Cranes	80.6		
	Welders	74.0		
	Tractors/Loaders/Backhoe	84.0		
Paving	Pavers	77.2	83.0	78.0
	Paving Equipment	89.5		
	Rollers	80.0		
Architectural Coating	Air Compressors	77.7	73.7	68.7

Notes:

1. The equipment list at each construction phase is based on the California Emissions Estimator Model and questionnaire filled by the applicant.
2. Federal Highway Administration. (2006). Construction Noise Handbook.
3. The noise levels are based on Table 9.1 of the Construction Noise Handbook. If the exact equipment listed is not available, a default noise level of 85 dBA, representative of typical construction equipment, is used. Specifically, the Forklift is modeled using this default value. Additionally, for the category of Tractors/Loaders/Backhoes, the noise level of a Tractor (81.7 dBA) is used, as it represents the loudest among the three.

Source: Noise and Vibration Impact Analysis (Appendix C)

The nearest sensitive receptors to the Project site are the existing residential uses adjacent the Project site boundary to the southeast (50 feet from the center of the site). Other noise sensitive land uses near the Project site are located at greater distances and would experience lower noise levels due to the additional attenuation from distance and the shielding of intervening structures, such as the existing block wall surrounding the site, except for portions along the southern and eastern perimeters adjacent to East 21st

Street and Tustin Avenue, where sections would be removed or modified to accommodate new driveways and improvements.

Construction noise was analyzed from the center of the Project site because construction equipment is mobile and operates throughout the site rather than at a fixed point. Using the center provides a conservative and standardized method that reasonably represents average noise conditions for nearby sensitive receptors. The construction noise analysis also assumes all pieces of equipment of each phase are operating together. Noise generated during construction activities is estimated to range between 68.7 dBA to 78.6 dBA dBA at the nearest sensitive receptors, which would not exceed the FTA thresholds of 80 dBA, as shown in Table 4-4 above. As such, construction-related noise impacts would be considered less than significant. Additionally, the proposed Project would be in compliance with the City's Municipal Code where construction is allowed between 7:00 AM and 7:00 PM Mondays through Fridays, and between 9:00 AM and 6:00 PM on Saturdays. Construction is prohibited on Sundays and specified federal holidays. Therefore, construction of the proposed Project would result in a less-than-significant impact.

Operation

The ongoing operation of the proposed Project is anticipated to generate nonhuman noise sources off-site from automobiles traveling to and from the Project site and on-site from heating, ventilation, and air conditioning (HVAC) equipment and mobile sources including passenger vehicles moving on-site, as well as daily delivery trucks and weekly garbage trucks.

To identify operational ambient noise level increases from the proposed Project, the Project's operational noise levels are combined with the existing ambient noise level measurements. The difference between the combined Project and ambient noise levels identifies the Project noise level increase. Based on the noise modeling results, operational noise generated by HVAC equipment, parking activities, and on-site mobile noises would be approximately 54.1 dBA during the daytime and 49.5 dBA during the nighttime at the site boundary, which would not exceed the City's exterior thresholds of 55 dBA and 50 dBA at the nearest residential property, respectively (Appendix C). Further, as ambient noise levels in the Project vicinity are 60.7 dBA CNEL, Project-related operational noise would be below the existing ambient noise environment and would not result in a measurable increase in overall noise levels (Appendix C). The incremental Project operational noise level increase is considered less than significant at all receiver locations.

Traffic Noise

Traffic generated by the operation of the proposed Project has the potential to influence the traffic noise levels in surrounding off-site areas and at the Project site. Vehicle noise is a combination of the noise produced by the engine, exhaust and tires. The level of traffic noise depends on three primary factors: (1) the volume of traffic; (2) the speed of traffic; and (3) the number of trucks in the flow of traffic. The proposed Project does not propose any uses that would require frequent truck trips and the proposed Project would not alter the speed limit on any existing roadway; so, the proposed Project's potential off-site noise impacts have been focused on the noise impacts associated with the change of volume of traffic that would occur from development of the proposed Project.

Roadway segment noise levels for the "Existing" and "Existing with Project" scenarios were compared to evaluate Project-related operational noise impacts. As shown in Table 4-5, the noise level under the

“Existing” scenario at the curbside feet from the roadway centerline ranges from 63.4 dBA to 65.8 dBA. With the addition of the proposed Project, the noise level would range from 63.8 dBA to 66.2 dBA. The increase due to the proposed Project would range from less than 0.4 to 0.6 dBA, which would not exceed the 3 dBA threshold along nearby roadways. As such, impacts would be less than significant.

Table 4-5: Existing Plus Project Traffic Noise Levels

Roadway Segment	Existing		Existing Plus Project				Increase over Existing Scenario (dBA)
	Existing ADT ¹	dBA @ Curbside from Roadway Centerline	Existing Plus Project ADT ²	dBA @ Curbside from Roadway Centerline	Centerline to 60 dBA CNEL (feet)	Centerline to 55 dBA CNEL (feet)	
E 21 st Street (West of Tustin Avenue)	1,921	63.4	2,112	63.8	45	97	0.4
Holiday Road (East of Tustin Avenue)	1,357	65.0	1,548	65.6	59	126	0.6
Tustin Avenue (Between Santiago Drive and E 19th Street)	2,000	65.8	2,191	66.2	65	139	0.4

Notes: ADT= average daily traffic; CNEL=Community Noise Equivalent Level; dBA=A-weighted decibels.

1. The existing ADT is referring to Table 9, *Existing Traffic Noise Levels*, of the Noise and Vibration Impact Analysis.

2. ADT of the Existing with Project is the total of the existing ADT and Project’s daily trips, which are 191 trips per day, based on the VMT Analysis provided by EPD Solutions, Inc.

Source: Noise and Vibration Impact Analysis (Appendix C)

Aircraft Noise

The closest airport to the Project site is John Wayne Airport, located approximately 2.3 miles northeast of the Project site. The 2025 airport noise contours identify that the Project site is located outside of the 60 dBA CNEL noise contour (John Wayne Airport, 2025). Therefore, the proposed Project would not be exposed to excessive aircraft noise and impacts related to aircraft noise would be less than significant.

Ground-borne Vibration

Construction activity can generate varying levels of ground vibration depending on the equipment used and methods employed. These vibrations propagate through the ground and decrease in intensity with distance. Buildings in the vicinity of the construction site respond to these vibrations with varying results ranging from no perceptible effects at the low levels to slight damage at the highest levels. Table 4-6 provides vibration levels for particular construction activities at a distance of 25 and 10 feet.

Table 4-6: Continuous Construction Equipment Vibration Levels

Equipment	Reference Vibration Level at 25 Feet (PPV [inches/second]) ¹	Vibration Level at 15 Feet (PPV [inches/second]) ²	Vibration Level at 10 Feet (PPV [inches/second]) ²
Loaded Trucks	0.076	0.164	NA
Jackhammer	0.095	0.140	0.257

Small Bulldozer	0.003	0.006	0.012
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Notes: NA=Not Applicable, the equipment would not be located as close as this distance.

1. FTA. (2018). *Transit Noise and Vibration Impact Assessment Manual*.

2. $PPV_{equip} = PPV_{ref} \times \left(\frac{25}{D}\right)^{1.5}$, D=distance between the equipment to the sensitive receptors.

Source: Noise and Vibration Impact Analysis (Appendix C)

Based on the equipment list in Table 4-4, above, construction of the proposed Project would use the following vibration-heavy equipment on-site: loaded trucks, a jackhammer, and a small bulldozer. Per confirmation from the applicant, the proposed Project would not utilize equipment over 80,000 pounds and heavy-vibration equipment, such as big bulldozers, vibratory roller or pile driver. The nearest structure would be located as close as 10 feet from a small bulldozer, which would generate a vibration level of 0.012 from a large bulldozer, which would be the most vibrating piece of equipment used for construction of the proposed Project. As shown in Table 4-6, the vibration level at the nearest residential structure would range from 0.012 to 0.0257 PPV (inches per second), which would not exceed the threshold of 0.3 inches per second established by Caltrans. As such, the vibration impacts during construction would be less than significant.

The Project proposes a 21-unit single-family residential development, which would not involve railroads or substantial heavy truck operations that are typically associated with significant operational vibration. Operation of the residences would include heavy trucks for residents moving in and out of the units and garbage trucks for solid waste disposal, which would not be frequent daily activities. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. Garbage trucks and delivery trucks on-site would be travelling at very low speeds, so it is expected that garbage truck vibration at nearby sensitive receptors would not be noticeable. Therefore, operational vibration impacts would be less than significant.

Overall, the proposed Project would not result in any significant effects relating to noise or vibration. Therefore, the proposed Project meets the noise and vibration related criteria of CEQA Guidelines Section 15332(d).

Air Quality

To support the Class 32 Categorical Exemption findings for the proposed Project, EPD Solutions, Inc. prepared an Air Quality Impact Analysis dated April 2026 that evaluates potential air quality-related impacts as a result of the implementation of the proposed Project (see Appendix D).

Air Quality Management Plan Consistency

The Project site is located in the South Coast Air Basin (SCAB), which is under the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the regional Air Quality Management Plan (AQMP), which addresses federal and State Clean Air Act requirements. The AQMP details goals, policies, and programs for achieving air quality standards and healthful air in the SCAB. In preparation of the AQMP, SCAQMD and SCAG use land use designations contained in General Plan documents from local agencies to forecast, inventory, and allocate regional emissions from land use and development-related sources.

As described in Chapter 12, in Section 12.2 and Section 12.3, of the SCAQMD's CEQA Air Quality Handbook (1993), for purposes of analyzing consistency with the AQMP, if a project would have a development density and vehicle trip generation that is substantially greater than what was anticipated in the General Plan, then the project would conflict with the AQMP. On the other hand, if a project's density is consistent with the General Plan, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers projects consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

As discussed previously, the proposed Project qualifies for concessions and increased density under California's Density Bonus Law (Government Code Section 65915). As such, the proposed Project is considered consistent with applicable land use policies, including for the purposes of evaluating air quality plan consistency. The AQMP relies on general plan and zoning assumptions for growth forecasts; however, projects that utilize State-mandated density bonuses are considered consistent with the AQMP so long as they do not exceed regional growth projections or conflict with the overarching goals of the Plan. As a result, the proposed Project would also be consistent with the assumptions in the AQMP and would not conflict with SCAQMD's attainment plans.

In addition, emissions generated by construction and operation of the proposed Project would not exceed significance thresholds, as shown below in Table 4-7 and 4-8. As described in the analysis below, the proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation. Therefore, the proposed Project is consistent with the AQMP, and impacts would be less than significant.

Regional Construction Emissions

Construction activities associated with the proposed Project would generate pollutant emissions from the following construction activities: site preparation, grading, building construction, paving, and architectural coating. The quantity of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring. In addition, the proposed Project would generate a need for construction worker vehicle trips to and from the Project site during construction. Construction of the proposed Project is expected to occur over three phases and last approximately 15 months; however, a conservative estimate of an 11-month single-phase assumption was utilized for modeling purposes.

It is mandatory for all construction projects to comply with several SCAQMD rules, including the following:

- **Rule 402 (Public Nuisance):** prohibits discharge of air contaminants that cause injury, nuisance, or annoyance to the public or damage to property.
- **Rule 403 (Fugitive Dust):** aims to control fugitive dust as well as particulate matter (particulate matter 10 microns in diameter [PM₁₀] and particulate matter 2.5 microns in diameter [PM_{2.5}]) emissions from construction activities and its requirements include, but are not limited to: applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12 inches, and maintaining effective cover over exposed areas.

- **Rule 1113 (Architectural Coatings):** governs the volatile organic compound (VOC) content in architectural coating, paint, thinners, and solvents, would be required.

Regional construction emissions associated with the proposed Project were modeled using the most recent version of the California Emissions Estimator Model (CalEEMod) and are presented in Table 4-7. As shown in Table 4-7, the construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds for criteria pollutants. Therefore, construction emissions from the proposed Project would result in a less-than-significant impact.

Table 4-7: Regional Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)*					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
2025						
Maximum Daily Emission 2026	1.89	16.66	18.45	0.03	2.99	1.72
Maximum Daily Emission 2027	26.55	11.21	13.94	0.03	0.36	0.33
Maximum Daily Emission (2026-2027)	26.55	16.66	18.45	0.03	2.99	1.72
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

* The higher emissions from the winter and summer scenarios are presented.

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter

Source: Appendix D

Regional Operational Emissions

Development and operation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with mobile sources (emissions from vehicle trips) and area sources (landscaping, applications of architectural coatings, and consumer products).

Regional operational emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table 4-8. As shown, the proposed Project would not result in long-term regional emissions of criteria pollutants that would exceed the SCAQMD's applicable thresholds. Therefore, impacts would be less than significant.

Table 4-8: Regional Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	0.64	0.60	6.73	0.02	1.85	0.48
Area	1.01	0.01	1.19	<0.01	<0.01	<0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Total Project Operational Emissions	1.65	0.61	7.92	0.02	1.85	0.48
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter

Source: Appendix D

Localized Significant Thresholds (LST)

The SCAQMD recommends the evaluation of localized nitrogen oxide (NOx), carbon monoxide (CO), PM₁₀, and PM_{2.5} construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. These thresholds set the maximum rates of daily construction or operational emissions from a project site that would not exceed a national or State ambient air quality standard.

Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered sensitive receptors. The nearest LST sensitive receptor to the Project site is the residential home located immediately adjacent to the Project site's southeastern boundary at 398 East 21st Street.

Construction

Table 4-9 presents the results of the localized construction emissions for 2026 and 2027 compared against the SCAQMD localized thresholds. As shown, the proposed Project would not exceed SCAQMD maximum daily localized emissions thresholds. Therefore, localized construction air quality impacts would be less than significant.

Table 4-9: Localized Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)			
	NOx	CO	PM ₁₀	PM _{2.5}
2026				
Site Prep	13.14	11.97	2.68	1.55
Grading	16.66	16.63	2.99	1.72
Building Construction and Paving	14.97	18.45	0.57	0.53
Building Construction	10.54	12.50	0.38	0.35
Maximum Daily Emissions 2026	16.66	18.45	2.99	1.72
2027				
Building Construction	10.10	12.44	0.34	0.31
Building Construction and Architectural Coating	11.21	13.94	0.36	0.33
Architectural Coating	1.11	1.50	0.03	0.02
Maximum Daily Emissions 2027	11.21	13.94	0.36	0.33
Maximum Daily Emission 2026-2027	16.66	18.45	2.99	1.72
SCAQMD Significance Thresholds	137.1	964.03	5.96	4.47
Threshold Exceeded?	No	No	No	No

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter

Source: Appendix D

Operational

According to the SCAQMD LST methodology, LSTs apply to stationary and on-site mobile sources from a project. Projects that involve mobile sources that spend extended periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational LSTs. Residential uses do not typically involve diesel vehicles regularly idling or queueing for long periods. Therefore, due to the lack of significant stationary source emissions or idling diesel-powered vehicles, impacts related to operational LSTs are presumed to be less than significant.

Overall, the Project would not result in significant impacts related to air quality. Therefore, the proposed Project meets the air quality related criteria of CEQA Guidelines Section 15332(d).

Water Quality

The Project site is located within the Newport Bay Watershed and is under the jurisdiction of the Santa Ana Regional Water Quality Control Board (SARWQCB), which sets water quality standards for all ground and surface waters within its region. Water quality standards are defined under the Clean Water Act (CWA) to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). Water quality standards for all ground and surface waters overseen by the SARWQCB are documented in its Basin Plan (Santa Ana Basin Plan),

and the regulatory program of the SARWQCB is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

Construction

Construction of the proposed Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would use heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff could wash into and pollute waters.

These types of water quality impacts during construction of the proposed Project would be prevented through implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction of the proposed Project would disturb more than one acre of soil; therefore, the proposed Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity. In addition, pursuant to the requirements of the SARWQCB and the City of Costa Mesa Municipal Code Title 8, Chapter III, *Water Quality*, the Project Applicant would be required to comply with the NPDES General Construction Activity Permit (SWRCB Order No. 2009-0030-DWQ) and City requirements for compliance with the SWPPP, Local Implementation Plan (LIP), and Orange County Drainage Area Management Plan (DAMP). Construction activity subject to this permit includes clearing, grading, and ground disturbances such as trenching, stockpiling, or excavation. The Construction General Permit requires implementation of a SWPPP to identify all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site. The SWPPP would generally contain a site map showing the construction perimeter, proposed buildings, stormwater collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways. The SWPPP would also include construction best management practices (BMPs) such as:

- Prompt revegetation of proposed landscaped areas;
- Perimeter gravel bags or silt fences to prevent off-site transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Adherence to the existing requirements and implementation of the appropriate BMPs as ensured through the City's construction permitting process would ensure that the proposed Project would not violate any

water quality standards or waste discharge requirements, potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

The proposed Project would introduce pollutants such as trash and debris, oil and grease from vehicles, and pesticides and sediments from landscaping. These pollutants could potentially discharge into surface waters and result in degradation of water quality. Thus, the proposed Project would be required to comply with existing regulations that limit the potential for pollutants to discharge from the site. Pursuant to the NPDES and City of Costa Mesa Municipal Code Title 8, Chapter III, *Water Quality*, a project-specific WQMP would be prepared prior to issuance of grading or building permits. The WQMP would specify low impact development (LID) practices and post-construction BMPs that would be incorporated into the project design to capture and treat stormwater runoff to reduce pollutants of concern before conveying the stormwater to the City's storm drain system, and ultimately to the Santa Ana River. The WQMP would be prepared in conformance with the DAMP and LIP. The proposed Project would also be subject to other applicable requirements of the City of Costa Mesa Municipal Code Title 8, Chapter III, including regulations related to stormwater discharge, prohibited discharges, and requirements to implement and maintain BMPs. Adherence to these statutory requirements and long-term maintenance of BMPs would ensure that water quality and waste discharge requirements are not violated.

For the purposes of stormwater quality, the Project proposes an on-site storm drain system designed to capture stormwater and convey it to an underground infiltration basin located beneath the internal driveway near the East 21st Street driveway. Stormwater collected through area drains and inlets would be directed to this primary facility where minor storm events would be treated and infiltrated. During larger storm events, overflow would discharge to the adjacent public streets consistent with existing drainage patterns. Off-site runoff would then enter the City of Costa Mesa drainage system, which includes a catch basin located on East 21st Street approximately 450 feet west of the Project site. The proposed drainage system would also remove coarse sediment, trash, and pollutants (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides). Proposed stormwater facilities would be designed to manage runoff for both water quality treatment and the 10-year, 25-year, and 100-year storm events for drainage and flood control. According to the Preliminary Drainage Study prepared for the proposed Project (Appendix E), the post-development peak flow rate is anticipated to remain consistent with existing conditions, with an increase in peak runoff of less than two percent for all storm events. Therefore, the proposed improvements would address the regional LID structural treatment BMP requirements and be able to capture runoff and mitigate to pre-Project conditions.

With implementation of the operational BMPs that would be included in the required WQMP, which is required pursuant to the SARWQCB and the City of Costa Mesa Municipal Code and verified during the permitting process for the proposed Project, potential pollutants would be reduced to the maximum extent feasible, and operation of the proposed Project would not violate any water quality standards or waste discharge requirements.

Overall, the proposed Project would not result in any significant effects relating to water quality; therefore, the proposed Project meets the water quality related criteria of CEQA Guidelines Section 15332(d).

e. Criterion Section 15332(e): Utilities: The site can be adequately served by all required utilities and public services.

The utilities necessary to construct and operate the proposed Project (electric, gas, trash, water, and sewer) would be adequately provided by existing utility service systems. The Project site is located in an urbanized and developed area. The proposed Project would connect to existing underground water, sewer, and drainage utility lines surrounding the Project site within East 21st Street and Tustin Avenue. The proposed Project would install a new water line on-site that would connect to the existing 10-inch and 8-inch water lines in Tustin Avenue and East 21st Street. In addition, the proposed Project would install a new sewer line on-site that would connect to the existing 8-inch sewer line in Tustin Avenue and East 21st Street. The proposed Project would include an on-site storm drain system designed to capture stormwater and convey it to an underground infiltration basin located beneath the internal driveway near the East 21st Street driveway. Stormwater collected through area drains and inlets would be directed to this primary facility where minor storm events would be treated and infiltrated. In addition, the proposed Project is anticipated to be fully electric; however, if natural gas service is required, it would be provided by Southern California Gas. There is an existing overhead electrical line located on East 21st Street and Tustin Avenue and an existing 2-inch gas line is located within Tustin Avenue. Given the size of the proposed Project and its location within an area that is currently served by utilities, the site can be adequately served by all required utilities and public services. Therefore, the proposed Project meets the criteria of CEQA Guidelines Section 15332(e).

4.2. EXCEPTIONS FOR EXEMPTIONS

In addition to investigating the applicability of CEQA Guidelines Section 15332 (Class 32), this CEQA document also assesses whether any of the exceptions to qualifying for the Class 32 Categorical Exemption for an infill project are present. The following analysis compares the criteria of CEQA Guidelines Section 15300.2 (Exceptions) to the Project.

a. Criterion 15300.2(a): Location: Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, State, or local agencies.

The proposed Project does not qualify for an exception under Classes 3, 4, 5, 6 or 11. The proposed Project is located within an urban developed area and is not located within a sensitive environment. In addition, the proposed Project would not result in any impacts on an environmental resource of hazardous or critical concern. Therefore, the exception under CEQA Guidelines Section 15300.2(a) is not applicable.

b. Criterion 15300.2(b): Cumulative Impact: All exemptions for these classes are inapplicable when the cumulative impact of successive projects with similar uses over a similar geological area, over time is significant.

As discussed in Section 4.1, *Proposed Project CEQA Exemption*, the proposed Project meets the requirements of CEQA Guidelines Section 15332. The proposed Project would subdivide the 1.49-acre site and develop 21 single-family lots. The Project site is already served by utilities and public services, as well as transportation facilities. Any construction effects would be temporary, confined to the Project vicinity, and reduced to a less-than-significant level by implementing existing applicable regulatory requirements. Further all operational impacts would be less than significant with implementation of existing regulatory requirements. Therefore, the proposed Project's impact would be less than significant and not cumulatively considerable. No successive projects of the same or similar use within the vicinity of the proposed Project are known or expected to occur over time that would result in cumulatively considerable impacts. Furthermore, as discussed throughout this document, the proposed Project would not result in significant environmental impacts that would be capable of combining with impacts from other cumulative projects to result in a cumulative impact. Therefore, the exception under CEQA Guidelines Section 15300.2 (b) does not apply to the Project.

c. Criterion 15300.2(c): Significant Effects: A Categorical Exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There are no known unusual circumstances that are applicable to the proposed Project, and which may result in a significant effect on the environment. The proposed Project consists of the development of 21 single-family lots, within an urban developed area that is served by utilities and transportation facilities. The Project would be consistent with the City's General Plan and the Municipal Code; thus, the provision of single-family residential buildings would not introduce a new activity to the area that could result in a significant effect on the environment. Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the proposed Project.

d. Criterion 15300.2(d): Scenic Highways: A Categorical Exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The Project site is not located within a State Scenic Highway corridor. The nearest Officially Designated State Scenic Highway to the Project site is the section of State Route 1 (SR-1) (California Department of Transportation, 2025). SR-1 is located approximately 1.75 linear miles south of the Project site and is not visible from the site. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the proposed Project.

e. Criterion 15300.2(e): Hazardous Waste Sites: A Categorical Exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Government Code Section 65962.5 requires various State and local agencies to compile and update lists of hazardous materials sites that may pose a threat to public health or the environment. These lists, collectively referred to as the “Cortese List”, are maintained by agencies such as the California Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and local enforcement agencies. The Cortese List includes hazardous waste sites, sites with known releases of hazardous substances, and other properties with potential contamination concerns.

A Phase I Environmental Site Assessment (ESA) was prepared for the Project site by Partner Engineering and Science, Inc. in April 2025 (Appendix F). The Phase I ESA included a review of environmental regulatory databases, historical land use records, aerial imagery, and a physical site reconnaissance conducted on April 1, 2025. Specifically, the Phase I ESA included a comprehensive records search of federal, State, County, City, and tribal environmental databases, performed using Environmental Data Resources (EDR) to identify any potential hazardous materials concerns associated with the Project site and Project vicinity.

The Phase I ESA confirmed that the Project site is not listed on the Cortese List or any other federal or State databases identifying hazardous materials sites, nor are there any adjoining sites listed. Additionally, although several nearby properties were identified in environmental records, none were determined to pose a Recognized Environmental Condition, Controlled Recognized Environmental Condition, or Historical Recognized Environmental Condition for the Project site. This conclusion was based on multiple factors, including the nature of the off-site listings, their distance from the Project site, presumed groundwater flow direction, and native soil conditions.

Therefore, based on the results of the Phase I ESA and the absence of hazardous materials concerns or listing on the Cortese List, the Project site is not subject to the exception under CEQA Guidelines Section 15300.2(e). The exception under CEQA Guidelines Section 15300.2(e) does not apply to the proposed Project.

f. Criterion 15300.2(f): Historical Resources: A Categorical Exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resources.

According to the State CEQA Guidelines, a historical resource is defined as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by the Project’s Lead Agency.

The City of Costa Mesa maintains an inventory of historical resources and implements historic preservation requirements pursuant to Chapter IX, Article 14 (Historic Preservation) of the City of Costa Mesa Municipal Code. In compliance with CEQA and the City’s Historic Preservation article, any property with potential historic significance is subject to evaluation prior to development approval.

As previously mentioned, the Project site was historically developed as a mobile home park. However, the Project site is currently predominantly disturbed, vacant, and undeveloped, with no existing active land uses. There are no existing buildings or structures on site. Therefore, the Project site is ineligible for listing in the National Register of Historic Places and California Register of Historical Resources and is not currently listed under the City's local register of historical resources. As such, the Project site does not contain a historical resource nor would it result in impacts to historical resources. Therefore, the exception under CEQA Guidelines Section 15300.2(f) does not apply to the proposed Project.

Conclusion

On the basis of the evidence provided above, the proposed Project is eligible for a Class 32 Categorical Exemption in accordance with Section 15332, *Infill Development Projects*, of the CEQA Guidelines. Because the proposed Project meets the criteria for categorically exempt infill development projects listed in CEQA Guidelines Section 15332 and it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the proposed Project.

5. REFERENCES

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