



Final  
**ENVIRONMENTAL IMPACT REPORT**  
SCH No. 1989010088

**ORANGE COUNTY FAIR AND  
EXPOSITION CENTER MASTER PLAN**  
VOLUME VI

AUGUST 2003

**FINAL  
ENVIRONMENTAL IMPACT REPORT**

**ORANGE COUNTY FAIR AND EXPOSITION CENTER MASTER PLAN**

**STATE CLEARINGHOUSE NUMBER: 1989010088**

**VOLUME VI: RESPONSE TO COMMENTS**

Submitted to:

32ND DISTRICT AGRICULTURAL ASSOCIATION  
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LSA Project No. CCZ030

**LSA**

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## MITIGATION MONITORING AND REPORTING PROGRAM

## MITIGATION AND MONITORING AND REPORTING PROGRAM

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.1 Aesthetics</b>			
PDF 1-1	The proposed Master Plan includes a conceptual Landscape Plan and landscape guidelines for groundcover, shrubs, and trees throughout the site. The landscaping provides visual relief and interest to views of the site as well as visual relief to the perimeter wall along the property line. This PDF will be confirmed by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
PDF 1-2	The proposed Master Plan includes a Lighting Plan. The Lighting Plan demonstrates that all outdoor lighting (street lights, parking lot security lights, and building lights) will be designed so that all lighting is confined to the project site and that adjacent residential properties are protected from spillover light and glare. This PDF will be confirmed by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
PDF 1-3	The overall project design will create attractive streetscape views by using high quality materials, neutral toned buildings, and extensive on-site and street frontage landscape elements. This PDF will be confirmed by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.2 Air Quality</b>			
MM 2-1	<p>In order to reduce short-term construction impacts from emissions from equipment and vehicles, prior to issuance of the Notice to Proceed, the following measures shall be included on all construction plans and in all construction contracts, to the satisfaction of the California Construction Authority:</p> <ul style="list-style-type: none"> <li>• The Construction Contractor shall select the construction equipment used on site based on low emission factors and high energy efficiency, as reported by the federal government.</li> <li>• The Construction Contractor shall ensure that construction plans include a statement that work crews must shut off equipment when not in use. During smog season (May through October) the overall length of the construction period will be extended, thereby decreasing the size of the area prepared each day, to minimize vehicles and equipment operating at the same time.</li> <li>• The Construction Contractor shall utilize electric or diesel powered equipment in lieu of gasoline powered engines, where feasible.</li> <li>• The Construction Contractor shall ensure that construction grading plans include a statement that all construction equipment will be tuned and maintained in accordance with the manufacturer's specifications.</li> </ul>	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<ul style="list-style-type: none"> <li>• The Construction Contractor shall time the construction activities so as not to interfere with peak hour traffic and so as to minimize obstruction of through traffic lanes adjacent to the site; if necessary, a flag person shall be retained to maintain safety adjacent to existing roadways.</li> <li>• The Construction Contractor shall provide ridesharing and transit incentives for the construction crew, such as free bus passes and preferred carpool parking.</li> </ul>		
MM 2-2	<p>In order to reduce fugitive dust from construction activities, the following shall be implemented by the applicant prior to commencement of grading or excavation:</p> <p>Prior to issuance of the Notice to Proceed, the California Construction Authority shall verify that the following provisions are included in the grading contractor's contract:</p> <ol style="list-style-type: none"> <li>1. During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.</li> <li>2. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the late morning, after work is completed</li> </ol>	Prior to commencement of grading or excavation/ Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<p>for the day, and whenever wind exceeds 15 miles per hour.</p> <ol style="list-style-type: none"> <li>3. Immediately after clearing, grading, earthmoving, or excavation is completed, the entire area of disturbed soil shall be treated until the area is paved or otherwise developed so that dust generation will not occur.</li> <li>4. Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binder to prevent dust generation.</li> </ol>		
MM 2-3	<p>In order to reduce fugitive dust from on-site and off-site vehicle activity, the following measures shall be implemented by the applicant and the contractor during the period of construction:</p> <p>The California Construction Authority shall verify that the following provisions are included in the grading contractor's contract prior to issuance of the Notice to Proceed:</p> <ol style="list-style-type: none"> <li>1. All trucks hauling, dirt, sand, soil, or other loose materials are to be covered, or shall maintain at least two feet of freeboard in accordance with the requirements of California Vehicle Code section 23114 ("freeboard" means vertical space between the top of the load and top of the trailer); covering shall be tightly secured to truck.</li> <li>2. Sweep adjacent streets once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed</li> </ol>	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA



PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<p>water). Sweep streets immediately after period of heaviest vehicular track-out activity.</p> <p>3. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. Set up truck washing area on paved access road area so subsequent truck travel on unpaved roads can be eliminated.</p> <p>4. Pave or provide gravel roadbed on all on-site construction access roads at least 100 feet onto the site from main road.</p> <p>5. Apply water three times daily, or apply non-toxic soil stabilizers, according to manufacturers' specifications, to all inactive construction areas (previously graded areas inactive for 10 days or more).</p> <p>6. Traffic speeds on all unpaved roads shall be reduced to 15 mph or less; effective traffic control or signage shall be installed and maintained.</p>		
MM 2-4	<p>A construction and construction related activity monitor satisfactory to the 32nd DAA Board of Directors and the California Construction Authority shall be retained by the applicant prior to issuance of the Notice to Proceed. The monitor shall monitor all activity on a daily basis, keep written daily records, and file daily activities reports with the California Construction Authority Project Manager, for the duration of grading and</p>	<p>Prior to issuance of the Notice to Proceed</p>	<p>California Construction Authority/32nd DAA</p>

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<p>construction. The monitor shall be employed by the OCFEC or California Construction Authority, and shall file reports with the California Construction Authority Project Manager. The monitor shall report on the following strategies:</p> <ul style="list-style-type: none"> <li>• Construction equipment exhaust shall be minimized by use of the following: <ul style="list-style-type: none"> <li>◦ NO<sub>x</sub> control technologies, such as fuel injection timing retard for diesel engines and air to air after cooling</li> <li>◦ Low sulfur fuel</li> <li>◦ Well maintained equipment and proper planning to minimize trip/use.</li> <li>◦ Log fuel use, hours of operation, and periodic maintenance.</li> </ul> </li> <li>• Fugitive dust shall be controlled as specified in Mitigation Measures 2-2 and 203, and SCAQMD rules and regulations.</li> <li>• Restrict delivery of construction supplies and off-site hauling of debris to non-peak travel periods whenever feasible, except for concrete and earthwork related activities.</li> <li>• Construction work travel in carpools shall be encouraged by common carpool registry, maintained at the construction site and managed by the applicant.</li> <li>• Application of building materials and architectural coatings shall be controlled by applicable SCAQMD rules and Mitigation</li> </ul>		

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	Measure 2-5.		
MM 2-5	<p>In order to reduce short-term construction emissions, the following mitigation measure shall be included on construction plans. The California Construction Authority shall verify inclusion of this measure prior to issuance of the Notice to Proceed.</p> <p>The construction contractor shall utilize pre-coated/natural color building materials, water based or low VOC coating, and coating transfer or spray equipment with high transfer efficiency, such as the high volume low pressure (HVLP) spray method, or use manual coating application methods such as the paint brush, hand roller, trowel, spatula, dauber, rag, or sponge.</p>	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.4 Cultural Resources</b>			
MM 4-1	Prior to issuance of the Notice to Proceed, the California Construction Authority shall verify that a County of Orange certified paleontologist has been retained to observe grading activities and salvage and catalogue fossils as necessary. The paleontologist shall be present at the pregrading conference, shall establish procedures for paleontological resource surveillance, and shall establish, in cooperation with the OCFEC and the California Construction Authority, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the fossils. If major paleontological resources are discovered, the paleontologist shall determine appropriate actions, in cooperation with the project developer, to ensure proper exploration and/or salvage. Excavated finds shall be prepared to the point of identification and offered to the County of Orange, or a designee within the County of Orange on a first refusal basis. If any paleontological resources are found, the paleontologist shall submit a follow-up report which shall include the period of inspection, a catalogue and analysis of the fossils found, and present repository of the fossils to the County of Orange or its designee. The 32nd DAA should be prepared to pay potential curation fees.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
MM 4-2	Prior to issuance of the Notice to Proceed, the California Construction Authority shall verify that a County of Orange certified archaeologist has been retained, shall be present at the pregrading	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<p>conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the OCFEC and the California Construction Authority, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the artifacts as appropriate. If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the OCFEC and the California Construction Authority, for exploration and/or salvage. The archaeologist shall submit a follow-up report to the County of Orange, or a designee within the County of Orange which shall include the period of inspection, a catalogue and analysis of any artifacts found, and present repository of the artifacts. Excavated finds shall be offered to the County of Orange, or designee, on a first refusal basis. The 32nd DAA should be prepared to pay potential curation fees.</p>		
MM 4-3	<p>The California Construction Authority shall verify that the following provision is included in the grading contractor's contract prior to issuance of the Notice to Proceed:</p> <p>If human remains are encountered during the course of construction, project-related activities in the immediate vicinity of the find will be temporarily diverted. The County Coroner will be contacted within 24 hours. The County Coroner will determine whether the remains are recent. If the remains are determined to be Native American</p>	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	in origin, the Native American Heritage Commission will be contacted immediately to determine the most likely descendant (MLD). The MLD will have the opportunity to become involved with the final disposition of the remains following scientific analysis.		

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.5 Earth Resources/Topography</b>			
PDF 5-1	The proposed project will be designed and construction in accordance with applicable portions of Zone 4 criteria from the current Uniform Building Code (UBC), the Uniform Fire Code, the County of Orange Grading Manual, and other applicable federal and State code. Adherence will minimize, to the extent feasible, any damage or injury caused by seismic ground shaking. This project design feature will be verified by the California Construction Authority during plan check and prior to issuance of the Notice to Proceed.	During plan check and prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
MM 5-1	Prior to issuance of the Notice to Proceed, project grading plans and structural plans for all buildings shall incorporate soil and seismic foundation recommendations of an updated soils and geotechnical report. In the updated soils and geotechnical report, the geotechnical engineer shall recommend one or more of the following measures, or other measures as determined appropriate, to treat expansive soils: presaturation of subgrade soils, increased reinforcement of concrete foundation elements, increased foundation embedment, use of posttensioned grade beams and floor slabs, blanketing the surface with nonexpansive compacted fill, blending expansive soils with nonexpansive soils, chemical stabilization, and/or increased jointing of building improvements.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<p>During design and grading, expansive soils shall not be placed or left at or near final grade unless special design and construction procedures are planned to offset the effects of such soils. If deemed necessary during grading operation, soil placement shall be supervised by the project's geotechnical engineer.</p> <p>During plan check and prior to issuance of the Notice to Proceed, the California Construction Authority shall confirm that recommended site preparation and compaction features are noted on all building plans and implemented as part of the construction level geologic review and investigation for the proposed project design.</p>		



PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.6 Water Quality and Hydrology</b>			
MM 6-1	<p>The proposed project must file a Notice of Intent (NOI) to apply for General Permit coverage prior to the commencement of construction activity. A Storm Water Pollution Prevention Plan (SWPPP) will be prepared in accordance with SWRCB Order No. 92-08-DWQ. The SWPPP shall be submitted to the Santa Ana RWQCB for review and comments. The SWPPP shall include a surface water control plan and erosion control plan to be implemented during construction. The SWPPP will emphasize structural and nonstructural BMPs to control sediment and nonvisible discharges from the site. Some of the BMPs to be implemented include the following:</p> <ul style="list-style-type: none"> <li>• Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the BMPs will be periodically inspected during construction, and repairs will be made when necessary as required by the SWPPP.</li> <li>• All materials that have the potential to contribute nonvisible pollutants to storm water must not be placed in drainage ways and must be contained, elevated, and placed in temporary storage containment areas.</li> </ul>	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<ul style="list-style-type: none"> <li>• All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected in a reasonable manner to eliminate any discharge from the site into the existing and proposed storm drain system. Stockpiles will be surrounded by silt fences and covered with plastic tarps.</li> <li>• The SWPPP will include inspection forms for routine monitoring of the site during the construction phase to ensure NPDES compliance.</li> <li>• Additional BMPs and erosion control measures will be documented in the SWPPP and utilized if necessary.</li> <li>• A Sampling and Analysis Plan (SAP) will also be included in the SWPPP that outlines a monitoring and sampling plan in accordance with SWRCB Resolution 2001-046.</li> </ul> <p>The SWPPP will be kept on site for the entire duration of project construction and will also be available to the local RWQCB for inspection at any time. This measure will be verified by the California Construction Authority prior to issuance of the Notice to Proceed.</p>		
MM 6-2	<p>The California Construction Authority shall verify that the following provisions are included in the construction contractor's contract prior to issuance of the Notice to Proceed:</p> <p>The Construction Contractor shall be responsible</p>	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<p>for performing and documenting the application of BMPs identified in the Storm Water Pollution Prevention Plan (SWPPP). Weekly inspections shall be performed on the sand bag barriers and other sediment control measures called for in the SWPPP. Monthly reports shall be maintained by the California Construction Authority Project Manager. Inspection records and compliance certification reports shall be submitted to the California Construction Authority Project Manager on a monthly basis and shall be maintained for a period of three years. Inspection schedules shall be monthly during the dry season and weekly during the wet season.</p> <p>The contractor shall inspect BMP facilities before and after every rainfall event that is predicted to produce observable runoff, and at 24 hour intervals during extended rainfall events, excepting days when there is no ongoing site activity. Pre-storm activities will include inspection of the major storm drain grate inlets and examination of other on-site surface flow channels and swales, including the removal of any debris that blocks the flow path. Post-storm activities will include inspection of the grate inlets, looking for any ponded water on the site and determining the cause, and looking for surface erosion. The Construction Contractor shall implement corrective actions specified by the California Construction Authority Inspector, as necessary.</p>		

<b>PDF, SC, or MM</b>	<b>Project Design Feature, Standard Condition, or Mitigation Measure</b>	<b>Timing of Verification</b>	<b>Responsible Party</b>
MM 6-3	The 32nd DAA shall submit and obtain approval of the Water Quality Management Plan (WQMP) from the City of Costa Mesa, Director of Development Services. The WQMP shall specifically identify Best Management Practices (BMPs) that will be used on site to control predictable pollutant runoff. Prior to issuance of the Notice to Proceed, the California Construction Authority will verify that approval from the City has been obtained for the WQMP.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.7 Land Use</b>			
PDF 7-1	Project design will comply with all applicable Uniform Building and Uniform Fire Code requirements. This PDF will be verified by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
PDF 7-2	Maintain safe points of ingress/egress to and from the surrounding street network. This PDF will be verified by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
PDF 7-3	The proposed Master Plan include a landscape plan and guidelines that provide for landscaping throughout the site. As part of the Master Plan, landscaping improvements will provide visual relief to the perimeter walls along the property line. This PDF will be verified by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.8 Noise</b>			
MM 8-1	<p>During project construction, the construction superintendent shall implement the following measures to reduce construction noise impacts:</p> <ul style="list-style-type: none"> <li>a) Limit construction hours to between 7:00 a.m. and 7:00 p.m. Monday through Saturday; construction is not permitted on Sundays and federal holidays</li> <li>b) Properly muffle and maintain all internal combustion engines used for construction on the site</li> <li>c) Locate all stationary noise generating sources, such as air compressors and portable power generators, as far away as feasible from homes (and classrooms when school is in session)</li> <li>d) Prohibit unnecessary idling of internal combustion engines</li> </ul> <p>Notations in the above format, appropriately numbered and included with other notations on the front sheet of grading plans, will be considered as adequate evidence of compliance with this mitigation measure. The California Construction Authority will verify the inclusion of notations during plan check and prior to issuance of the Notice to Proceed.</p>	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
MM 8-2	<p>Prior to operation of the amphitheater as described in the Master Plan (including removal of the berm), the 32nd DAA shall implement all or any combination of the following noise control measures to meet the requirements of the 1990 Order:</p> <ul style="list-style-type: none"> <li>• Partial walls;</li> <li>• Partial enclose (walls and a portion of a roof);</li> <li>• Full enclosure; and</li> <li>• Noise control and monitoring at the source.</li> </ul> <p>If partial enclosure is considered, the opening of the enclosure will be designed so that it is not open to the direction of any noise sensitive land uses. In addition, sound absorptive material or finish is to be used on the interior surface of the partial enclosure to reduce the potential of noise leaking out of the enclosure.</p>	Prior to operation of the amphitheater as described in the Master Plan	32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.10 Public Services and Utilities</b>			
PDF 10-1	Project design will facilitate implementation of “defensible space” measures to deter criminal activity within the project site. These measures may include, but are not limited to, strategically placed lighting, the use of plant materials to discourage window access, and ongoing maintenance of large or tall landscaping that could limit a law enforcement officer’s ability to adequately visually survey the area while on patrol. This design feature will be verified by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
PDF 10-2	Pursuant to Title 24, California Code of Regulations (CCRs), the project design will incorporate the use of energy efficient appliances whenever feasible to minimize the ongoing use of electrical and natural gas resources. This design feature will be verified by the California Construction Authority during plan check (24 CCR).	During plan check	California Construction Authority/32nd DAA
MM 10-1	Prior to issuance of the Notice to Proceed, the California Construction Authority shall submit to the Deputy State Fire Marshal evidence of the on-site fire hydrant system. The OCFEC/32nd DAA shall make provisions for the repair and maintenance of the system, in a manner meeting the approval of the Deputy State Fire Marshal.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA



PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
MM 10-2	<p>(a) All structures over 6,000 square feet shall be protected by an automatic sprinkler system, in a manner meeting the approval of the Deputy State Fire Marshal.</p> <p>(b) Prior to construction, the California Construction Authority shall submit and obtain approval of plans for any required automatic fire sprinkler system in any structure to the Office of the State Fire Marshal for review and approval.</p> <p>(c) Prior to building occupancy, this system shall be operational in a manner meeting the approval of the Deputy State Fire Marshal</p>	Prior to construction/Prior to building occupancy	California Construction Authority/32nd DAA
MM 10-3	<p>(a) Prior to issuance of the Notice to Proceed, the California Construction Authority shall submit and obtain approval of plans for all roads, streets, and courts, public or private, from the Deputy State Fire Marshal. The plans shall include the following:</p> <ul style="list-style-type: none"> <li>• The plan view and the sectional view shall indicate the grade and width of the street or court, measured flow line to flow line.</li> <li>• All proposed fire apparatus turnarounds shall be approved by the Deputy State Fire Marshal and, if needed, clearly marked when a dead-end street exceeds 150 feet or when otherwise required.</li> <li>• Applicable construction drawings, or other approved documents, shall contain provisions that prohibit obstructions, such</li> </ul>	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	<p>as speed bumps/humps, control gates, or other modifications within said easement or access road, unless prior approval is obtained from the Deputy State Fire Marshal.</p> <ul style="list-style-type: none"> <li>• The locations of red curbing and signage and a drawing of the proposed signage with the height, stroke, and color of lettering and the contrasting background color</li> </ul> <p>(b) The fire lanes shall be installed in accordance with the approved fire lane plan prior to building occupancy. The construction drawings or other approved documents shall contain a fire lane map and provisions that prohibit parking in the fire lanes. The method of enforcement shall be documented.</p>		
MM 10-4	<p>Prior to issuance of the Notice to Proceed, plans for the fire alarm system shall be submitted by the California Construction Authority to the Deputy State Fire Marshal for review and approval. This system shall be operational in a manner meeting the approval of the Deputy State Fire Marshal prior to building occupancy.</p>	<p>Prior to issuance of the Notice to Proceed</p>	<p>California Construction Authority/32nd DAA</p>
MM 10-5	<p>Prior to construction, the builder shall submit a letter on company letterhead to the California Construction Authority Project Manager stating that water for firefighting purposes and all-weather fire protection access roads shall be in place and operational before any combustible material is placed on site. The California</p>	<p>Prior to issuance of the Notice to Proceed</p>	<p>California Construction Authority/32nd DAA</p>

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
	Construction Authority shall verify inclusion of this measure on construction plans and in all construction contracts prior to issuance of the Notice to Proceed.		
MM 10-6	Prior to issuance of any Notice to Proceed, the California Construction Authority shall provide the Costa Mesa Sanitary District with a map of the on-site sewers. All necessary permits required for connection to the sewer system will be obtained or renewed, as needed	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
MM 10-7	Prior to issuance of the Notice to Proceed, OCFEC staff and/or the California Construction Authority shall prepare a Waste Management Plan for approval by the 32nd DAA Board of Directors. Final design plans shall clearly identify the current number, capacity, and location of all bin enclosures and recycle containers.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.11 Recreation</b>			
PDF 11-1	Entrances will be designed in such a way that bicyclist will have easy access, including off-road connections, between the bikeways and bike rack/lockers. This design feature will be verified by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA
PDF 11-2	Bike racks and/or lockers will be installed near all fair entrances and in other appropriate areas through the site. This design feature will be verified by the California Construction Authority prior to issuance of the Notice to Proceed.	Prior to issuance of the Notice to Proceed	California Construction Authority/32nd DAA

PDF, SC, or MM	Project Design Feature, Standard Condition, or Mitigation Measure	Timing of Verification	Responsible Party
<b>4.12 Traffic and Circulation</b>			
12-1	Prior to commencement of construction, the California Construction Authority will coordinate with the City of Costa Mesa regarding haul routes and postproject street maintenance specifically pertaining to removal of materials from the project site during grading and construction periods.	Prior to commencement of construction	California Construction Authority/32nd DAA

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## RESPONSE TO COMMENTS

## RESPONSE TO COMMENTS

### INTRODUCTION

As required by CEQA Guidelines Section 15087, a public Notice of Availability (NOA) of the Draft Environmental Impact Report (DEIR) for the Orange County Fair and Expositions Center Master Plan was filed with the Orange County Clerk on March 18, 2003. In addition, the NOA was mailed to approximately 615 private citizens, groups, and organizations that had requested to be notified of the availability of the DEIR. The NOA was also published in the Daily Pilot and the Los Angeles Times on March 19, 2003. The DEIR was circulated for public review for a period of 45 days, from March 19, 2003 to May 2, 2003. Copies of the DEIR were mailed to all responsible agencies and to the State Clearinghouse and were made available for public review at the Orange County Fair And Exposition Center Administration office, Mesa Verde Branch Library and Costa Mesa Branch Library. Copies of the DEIR were also made available for purchase through OCB Reprographics.

A total of 10 comment letters were received during the public review period. Comments were received from State and local agencies, organizations, interested parties, and private citizens. Comments that address environmental issues are thoroughly responded to. In some cases, corrections to the DEIR are required or additional information is provided for clarification purposes. However, some of the comments do not address the adequacy or completeness of the DEIR, do not raise environmental issues, or do request the incorporation of additional information not relevant to environmental issues. Such comments do not require a response, pursuant to Section 15088(a) of the CEQA Guidelines.

Many comments raise similar or identical issues. To address these comments, a single response is provided the first time the issue is raised, and subsequent responses refer to the initial response.

Section 15088 of the state CEQA Guidelines, Evaluation of and Response to Comments, states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.
- b) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.



- c) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:
1. Revise the text in the body of the EIR; or
  2. Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this Response to Comments document clarifies, amplifies, or makes minor modifications to the DEIR. No significant changes have been made to the information contained in the DEIR as a result of the responses to comments, and no significant new information has been added. Therefore, this Response to Comments document is being prepared as a separate section of the EIR, and is included as part of the Final EIR, for consideration by the 32nd District Agricultural Association (32nd DAA), prior to a vote to certify the Final EIR.

## INDEX OF COMMENTS RECEIVED

The following is an index list of the agencies, groups, and persons who commented on the Draft EIR, prior to the close of the public comment period, or immediately thereafter. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed with a number below.

#	Name	Date
S-1	California Department of Transportation	April 25, 2003
S-2	State Clearinghouse	May 5, 2003
L-1	City of Costa Mesa	May 1, 2003
L-2	County of Orange, Planning and Development Services	May 2, 2003
L-3	County of Orange, Public Facilities and Resources	May 5, 2003
O-1	Callahan and Blaine	May 1, 2003
O-2	Vanguard University	May 1, 2003
I-1	Margaret H. Nellor	April 30, 2003
I-2	Lorraine Tatham	May 1, 2003
I-3	Sandra Genis	May 2, 2003

## FORMAT OF RESPONSES TO COMMENTS

Responses to each of the comment letters are provided on the following pages. The comment letter number is provided in the upper right hand corner of each comment letter, and individual points within each letter are numbered along the right-hand margins of each letter. The 32nd DAA's responses to each comment letter immediately follow each letter and are referenced by the index numbers in the margins.

## ACRONYMS

AC	Acreage
ADT	Average Daily Trips
AVO	Average Vehicle Occupancy
BMP	Best Management Practice
Caltrans	California Department of Transportation
CCA	California Construction Authority
CEQA	California Environmental Quality Act
CEQA Guidelines	Guidelines for the California Environmental Quality Act
DAA	District Agricultural Association
DAMP	Drainage Area Management Plan
DEIR	Draft Environmental Impact Report
EIR	Environmental Impact Report
FAR	Floor Area Ratio
FEIR	Final Environmental Impact Report
MPRRHT	Master Plan of Regional Riding and Hiking Trails
NPDES	National Pollution Discharge Elimination System
OCFEC	Orange County Fair and Exposition Center
OCMMA	Orange County Marketplace Merchants Association
OCP	Orange County Projections
PAC	Project Advisory Committee
PFRD	Public Facilities & Resources Department
SF	Square Feet
TIA	Traffic Impact Analysis
WQMP	Water Quality Management Plan

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DEPARTMENT OF TRANSPORTATION

DISTRICT 12  
3337 Michelson Drive Suite 380  
Irvine, CA. 92612-8894



RECEIVED  
MAY 05 2003

Mail and Fax

April 25, 2003

Ms. Becky Bailey-Findley  
32 District Agriculture Association  
88 Fair Drive  
Costa Mesa, CA 92626

File: IGR/CEQA  
SCH#: 1989010088  
Log #: 1080A  
SR #: 55

**Subject: Draft Environmental Impact Report (DEIR) for the Orange County Fair and Exposition Center Master Plan**

Dear Ms. Bailey-Findley,

Thank you for the opportunity to review and comment on the **Draft Environmental Impact Report (DEIR) for the Orange County Fair and Exposition Center Master Plan** dated March 19, 2003. The project consists of removing and replacing existing structures, constructing new additional structures, constructing additional parking areas, and establishing a coherent and thematic landscape, sign, and lighting plan. In general, the project will result in a core of facilities surrounded by a parking area. The core of facilities will be divided into two general areas – a Park (open space) area and Campus (buildings) area. The project is located in central Costa Mesa, on the north side of Fair Drive, between Newport Boulevard to the east and Fairview Drive to the west. Arlington Drive is located along the site's north boundary. Regional access is provided to the site by State Route 55 to the north and east.

S-1-1

Caltrans District 12 is a responsible agency on this project, and has the following comments:

S-1-2

- 1. During construction of the project, a traffic management plan (TMP) should be prepared in advance and submitted to Caltrans for review and approval.
- 2. It is a reminder that any construction within the state right of way, an application for an Encroachment Permit shall be submitted to Caltrans prior to construction.

S-1-3

S-1-4

Please continue to keep us informed of this project and other future developments, which could potentially impact the State transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Lan Zhou at (949) 756-7827.

S-1-5

Sincerely,

Robert F. Joseph, Chief  
Advanced Planning Branch

- c: Terry Roberts, Office of Planning and Research.
- Ron Helgeson, Caltrans HQ IGR/Community Planning
- Saied Hashemi, Traffic Operations

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## CALIFORNIA DEPARTMENT OF TRANSPORTATION

- S-1-1 The comment is introductory and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.
- S-1-2 The 32nd DAA respectfully disagrees with the assertion that Caltrans District 12 is a responsible agency for the proposed project. Pursuant to CEQA (§ 21069), a responsible agency is a public agency with responsibility for carrying out or approving a project. Consistent with this definition (CEQA §21002.1(d)), a responsible agency is charged with consideration of the environmental effects of only those activities involved in a project that it is required by law to carry out or approve. Caltrans is not required by law to carry out or approve any activities associated with implementation of the proposed project, nor is Caltrans responsible for approving or carrying out project mitigation.
- S-1-3 It is not clear from the information provided in the comment why a Traffic Management Plan must be submitted to Caltrans District 12 for review and approval. Section 4.12, Traffic and Circulation, found no significant impacts to regional/Caltrans transportation facilities. Caltrans is not required by law to carry out or approve any activities associated with implementation of the proposed project, nor is Caltrans responsible for approving or carrying out project mitigation. Therefore, the 32nd DAA is not required to submit such a plan to Caltrans.
- S-1-4 It is not expected that any construction associated with implementation of the proposed project will occur within the State right-of-way, and therefore an Encroachment Permit is not required.
- S-1-5 The 32nd DAA will continue to coordinate with Caltrans District 12 on this project and other future development that may potentially impact State transportation facilities. The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.

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Gray Davis  
Governor

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



Tal Finney  
Interim Director

May 5, 2003

Becky Bailey-Findley  
32 District Agriculture Association  
88 Fair Drive  
Costa Mesa, CA 92626

Subject: Orange County Fair and Exposition Center Master Plan  
SCH#: 1989010088

Dear Becky Bailey-Findley:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 2, 2003, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

S-2-1



**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 1989010088  
**Project Title** Orange County Fair and Exposition Center Master Plan  
**Lead Agency** Orange County

**Type** EIR Draft EIR  
**Description** The proposed project will involve removing and replacing existing structures, constructing new additional structures, constructing additional parking areas, and establishing a coherent and thematic landscape, sign, and lighting plan. In general, this will result in a core of facilities surrounded by a parking area. The core facilities area will be divided into two general areas-the Park area (open space) and Campus area (buildings).

**Lead Agency Contact**

**Name** Becky Bailey-Findley  
**Agency** 32 District Agriculture Association  
**Phone** 714-708-1510 **Fax**  
**email**  
**Address** 88 Fair Drive  
**City** Costa Mesa **State** CA **Zip** 92626

**Project Location**

**County** Orange  
**City** Costa Mesa  
**Region**  
**Cross Streets** Fair Drive, Newport Boulevard

Parcel No.	Range	Section	Base
<b>Township</b>			

**Proximity to:**

**Highways** SR 55, I-405, and SR-73  
**Airports** John Wayne Airport  
**Railways**  
**Waterways** Santa Ana Delhi Channel, Paularino Channel, Upper Newport Bay  
**Schools** Costa Mesa High School, Davis Intermediate School,  
**Land Use** Fairgrounds

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 12; Department of Food and Agriculture; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 8; Native American Heritage Commission; State Lands Commission

**Date Received** 03/19/2003 **Start of Review** 03/19/2003 **End of Review** 05/02/2003

Note: Blank in data fields result from insufficient information provided by lead agency.

## DEPARTMENT OF TRANSPORTATION

## DISTRICT 12

3337 Michelson Drive Suite 380  
Irvine, CA. 92612-8894



## Mail and Fax

April 25, 2003

Ms. Becky Bailey-Findley  
32 District Agriculture Association  
88 Fair Drive  
Costa Mesa, CA 92626

File: IGR/CEQA  
SCH#: 1989010088  
Log #: 1080A  
SR #: 55

**Subject: Draft Environmental Impact Report (DEIR) for the Orange County Fair and Exposition Center Master Plan**

Dear Ms. Bailey-Findley,

Thank you for the opportunity to review and comment on the **Draft Environmental Impact Report (DEIR) for the Orange County Fair and Exposition Center Master Plan** dated March 19, 2003. The project consists of removing and replacing existing structures, constructing new additional structures, constructing additional parking areas, and establishing a coherent and thematic landscape, sign, and lighting plan. In general, the project will result in a core of facilities surrounded by a parking area. The core of facilities will be divided into two general areas – a Park (open space) area and Campus (buildings) area. The project is located in central Costa Mesa, on the north side of Fair Drive, between Newport Boulevard to the east and Fairview Drive to the west. Arlington Drive is located along the site's north boundary. Regional access is provided to the site by State Route 55 to the north and east.

Caltrans District 12 is a responsible agency on this project, and has the following comments:

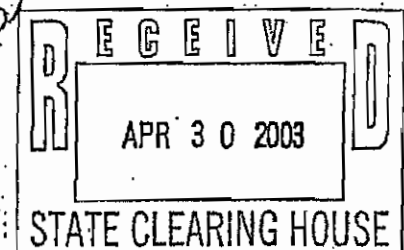
1. During construction of the project, a traffic management plan (TMP) should be prepared in advance and submitted to Caltrans for review and approval.
2. It is a reminder that any construction within the state right of way, an application for an Encroachment Permit shall be submitted to Caltrans prior to construction.

Please continue to keep us informed of this project and other future developments, which could potentially impact the State transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Lan Zhou at (949) 756-7827.

Sincerely,

Robert F. Joseph, Chief  
Advanced Planning Branch

c: Terry Roberts, Office of Planning and Research  
Ron Helgeson, Caltrans HQ IGR/Community Planning  
Saied Hashemi, Traffic Operations



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**STATE OF CALIFORNIA, GOVERNOR'S OFFICE OF PLANNING  
AND RESEARCH, STATE CLEARINGHOUSE**

- S-2-1 The comment provides information regarding processing of the document by the State of California, Governor's Office of Planning and Research, State Clearinghouse and acknowledges that the 32nd DAA has complied with State Clearinghouse review requirements for DEIRs, pursuant to CEQA. Caltrans District 12 was the only agency that sent a response to the State Clearinghouse. Comments from Caltrans District 12 were addressed in Response to Comments S-1-1 through S-1-5. The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.

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# CITY OF COSTA MESA

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92626-1200

DEVELOPMENT SERVICES DEPARTMENT

May 1, 2003

Ms. Becky Bailey-Findley, CEO  
Orange County Fair and Exposition Center  
88 Fair Drive  
Costa Mesa CA 92626

**Subject: ORANGE COUNTY FAIR AND EXPOSITION CENTER  
DRAFT ENVIRONMENTAL IMPACT REPORT SCH# 1989010088**

Dear Ms. Bailey-Findley:

Thank you for the opportunity to review and comment on the Orange County Fair and Exposition Center's "Master Plan Draft Environmental Impact Report" (DEIR). Personnel from several City departments have spent considerable time analyzing the DEIR data due to the significance and far reaching impacts of the Plan's implementation. Their consolidated comments and questions are attached to this transmittal letter for your consideration.

L-1-1

The Orange County Fair and Exposition Center Master Plan is very impressive and obviously reflects a significant commitment and contribution by the Fair to our community. However, the Master Plan Draft Environmental Impact Report does not present sufficient information to assure us the expansion program will not generate significant environmental impacts.

L-1-2

As an overall comment, the City found it difficult to determine what is the "proposed project" being analyzed by the DEIR. Specifically, the report's project description lacks a discussion on the various growth assumptions and specific improvements/buildings to be either demolished or constructed. Furthermore, we have serious concerns with the DEIR's traffic generation methodology, the lack of any parking demand analysis, and inadequate noise analysis. For example, the entire Fairground parking demand analysis is presented in one paragraph on page 4.12-31. Should the Fair's increasing attendance result in sell-out parking, your DEIR simply states the following:

L-1-3

L-1-4

*"However, during the large events like the summer fair, demand for parking may regularly exceed the supply, regardless of how many spaces are provided. It should be noted, however, that the majority of vehicle*

L-1-5

*trips generated by the OCFEC are due to its recreational opportunities. As a recreational trip is discretionary, if parking is not available, motorists will be forced to seek alternative recreational opportunities. A state of equilibrium will be created that is reflective of the total parking supply and the turnover of vehicles throughout the day. With adequate enforcement of applicable laws, significant environmental impacts associated with parking are not anticipated."*

L-1-5

Unfortunately, we must disagree with your consultant's opinions and assumptions used in both the traffic and noise analysis. The noise analysis is inadequate in that it states, "noise levels associated with non-fair concert events in the amphitheater may be significant." While vague noise mitigation measures are proposed for "non-Fair" concerts, unless the same mitigation measures are constructed/implemented for Fair concerts, it appears noise levels could be disturbing to neighboring residents after removal of the amphitheater berm. While the number of amphitheater seats would be significantly reduced, we would hope sound amplification is concurrently reduced for the smaller seating area. However, the DEIR does not address this likelihood or propose any noise mitigation for Fair concerts.

L-1-6

L-1-7

L-1-8

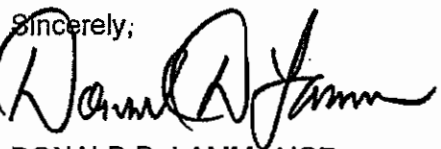
Since the City wishes to cooperate in the implementation of a community-compatible master plan, we request you direct your environmental consultant to address our issues and questions by revising the DEIR to include the data we need. Upon completion of an adequate DEIR, in fairness to the neighboring community and City, we request the document be re-circulated for an expedited review period. As currently written, it is the City's opinion the DEIR does not adequately address all potentially significant impacts.

L-1-9

Our City personnel are available to your consultants if further clarification is needed. Planner and project manager Kimberly Brandt is available to coordinate all necessary meetings. Ms. Brandt can be reached at (714) 754-5604.

L-1-10

We look forward to receiving the revised DEIR with answers to our questions and comments. Should you have any questions, do not hesitate to call me at (714) 754-5270.

Sincerely,  


DONALD D. LAMM, AICP  
Deputy City Manager-  
Development Services Director

cc: City Council  
Allan Roeder, City Manager  
Tom Wood, City Attorney  
Perry Valantine, Assistant Development Svs. Director

Mike Robinson, Planning and Redevelopment Mgr.  
Kimberly Brandt, Senior Planner  
Bill Morris, Public Services Director  
Peter Naghavi, Transportation Services Manager  
David Snowden, Police Chief  
Sue Hupp, Crime Prevention Specialist

Attachments



**CITY OF COSTA MESA COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT SCH# 1989010088**

**ORANGE COUNTY FAIR AND EXPOSITION CENTER MASTER PLAN**

**INTRODUCTION**

- |    |   |        |
|----|---|--------|
| 1. | Please clarify what are the "anticipated social effects"?   | L-1-11 |
| 2. | Site Plan Modifications: Please describe the differences in the site plan for the benefit of the readers and commentors.  | L-1-12 |
| 3. | Isn't this project an amendment to an existing Master Plan? The EIR should provide background information on past master plans and environmental impact reports that have been approved/prepared for the Fairgrounds. | L-1-13 |

**PROJECT DESCRIPTION:**

- |    |  |        |
|----|--|--------|
| 1. | As requested in our NOP response, please provide more detailed information on the amphitheater's date of construction, berm construction, past operation schedule, and ownership changes.  | L-1-14 |
| 2. | As an overall comment, the City found it difficult to understand the "proposed project" since the Project Description lacks a discussion of the various growth assumptions used in the quantitative DEIR's analyses. The Air Quality Section is the first EIR section that makes mention of the alternative growth assumptions (i.e. Interim Event, Interim Event with Concert, and incremental Fair attendance growth), and it is not until the Traffic and Circulation section (the last section in the project-specific quantitative analysis) that these assumptions are fully defined. Also, the Noise section contains the first reference to the fact that the primary focus of the EIR "...is the use of facilities other than the summer Fair." These omissions create considerable and unnecessary confusion that should be corrected in the Final EIR. The Project Description should clearly state the various project assumptions and specific improvements to be demolished and constructed as part of Master Plan implementation. | L-1-15 |
| 3. | As requested in our NOP response, what is the overall change in landscaping? Please provide this information by:   | L-1-16 |
|    | <ul style="list-style-type: none"> <li>• Perimeter area</li> <li>• Parking Lot</li> <li>• Interior areas</li> </ul>  | L-1-17 |
|    |  | L-1-18 |

- |  |        |
|--|--------|
| 4. The DEIR lacks any information on how the front of the amphitheater will be altered, other than the ticket booth being removed and an orange tree grove installed. Will access Fair concerts be limited to inside the Fairgrounds? Elevations of the amphitheater from its front and rear, and site plans showing access gates to Fair and non-Fair, events would be helpful in understanding its proposed reconfiguration. | L-1-19 |
| 5. Table 3.1.A Existing Facilities. It is unclear from this table how much building square footage currently exists on the 150-acre site. For instance, the amphitheater is shown at 351,560 square feet; how much of that total is building area versus the open seating area?  | L-1-20 |
| 6. Figures 3.1.3 and 4.7.1: The residential area west of Fairview Road is all single-family residential.   | L-1-21 |
| 7. Figure 3.2.1: The legend should identify the light standards and entry monument sign, and the shadows appear to be cast in the wrong direction.   | L-1-22 |
| 8. Table 3.2.A Net Change in Square Footage. Again, please indicate building square footage for each of the components listed. It is impossible to analyze Floor Area Ratio (FAR) consistency without this information. This table should also show changes in building areas.   | L-1-23 |
| 9. The reduction in equestrian area is 35% not 50% as indicated.   | L-1-24 |
| 10. Page 3-10: Please indicate at what time the listed storm drain improvements would be constructed.  | L-1-25 |
| 11. Lighting: Are the high mast poles existing or new poles?   | L-1-26 |
| 12. The Phasing Plan references building numbers that are not included on any site plan contained in the Project Description. This information would be helpful to the reader.   | L-1-27 |
| 13. As requested in our NOP comment, the Project Description should include detail information of the Fairground's parking lots—this information should also be shown on an exhibit.   | L-1-28 |

## SECTION 4.1 AESTHETICS

- |  |        |
|--|--------|
| 1. Three more photographic simulations should be added. The first should be from Arlington Drive, directly north of the amphitheater, and the second from Fairview Road in the vicinity of Merrimac. The proposed electronic reader board sign should be shown in this view. The impact of the new sign on Fairview Road, from the residential area to the west, needs to be addressed in the Final EIR. | L-1-29 |
|  | L-1-30 |
|  | L-1-31 |

Also, a view simulation should be provided from Newport Boulevard, which indicates the relocated sign. Are the existing billboards along Newport Boulevard to be retained or removed with the sign relocation? Since it is the City's position to minimize sign clutter, the City requires 150 feet between freestanding signs. How would the signage along Newport Boulevard comply with City sign standards? | L-1-32  
| L-1-33  
| L-1-34

2. Also Views B and C are mislabeled in the DEIR text and only three view locations are provided in the text, not four as stated in the DEIR. | L-1-35

3. Figure 4.1.2 View A Simulation. The proposed replacement of the coral trees with palm trees results in the loss of a shade canopy in a very stark parking area. Consideration should be given to using canopy trees, as well as other types of plant materials in place of the proposed grass. Are the new light standards included in this view simulation? | L-1-36  
| L-1-37

SECTION 4.2 AIR QUALITY

1. Mitigation Measure 2-1: Consideration should be given to requiring a "diesel fuel reduction plan" for the construction phase of the project. Sample language used in a recent City EIR is provided below as a suggested mitigation measure:  
  
"In order to reduce diesel fuel engine emissions, the project applicant shall require that all construction bid packages include a separate "Diesel Fuel Reduction Plan". This plan shall identify actions to be taken to reduce diesel fuel emission during construction activities (inclusive of grading and excavation activities). Reduction in diesel fuel emissions can be achieved by measures including, but not limited to, the following: a) use a alternative energy sources, such as compressed natural gas or liquefied petroleum gas, in mobile equipment and vehicles; b) use of "retrofit technology", including diesel particulate traps on existing diesel engines and vehicles; and c) other appropriate measures. Prior to the issuance of a grading permit, the Diesel Fuel Reduction Plan shall be filed with the 32<sup>nd</sup> DAA and CCA." | L-1-38
2. Mitigation Measure 2-2 (3): What is the disturbed soil to be treated with? | L-1-39
3. Mitigation Measure 2-4: Are not the 32<sup>nd</sup> DAA and the CCA the applicants for this project? | L-1-40
4. Long-term Regional Air Quality Impacts: This is the first time in the DEIR there is a discussion regarding "Typical Weekend", "Interim Event", "Interim Event with Concert", and "Fair Event". | L-1-41

Considering these are foundations of the DEIR's quantitative analyses, project assumptions should be discussed in detail in the Project Description as noted earlier. | L-1-41

**SECTION 4.3 BIOLOGICAL RESOURCES**

1. This section should identify how many trees are to be removed and how many new trees planted on the Fairground site. | L-1-42

**SECTION 4.6 HYDROLOGY AND WATER QUALITY**

1. The City's new Drainage Area Management Plan (DAMP) and Local Implementation Plan (LIP) will be approved by the City Council in June and submitted to Regional Board on July 1<sup>st</sup>. Your project will be required by the City and the Regional Water Quality Board to meet requirements in the current DAMP and LIP at any point during the construction process. | L-1-43

2. The new California Best Management Practices (BMP) Handbook is now available, and the BMP Fact Sheets included in these documents supersede the fact sheets included in this WQMP. | L-1-44

3. Catch basin stenciling should utilize the City of Costa Mesa standard as follows: Duracast curb markers shall be installed at each location; if no existing markers are installed or if existing markers are faded or worn. If existing markers are to be replaced they must be removed and disposed of correctly. Duracast Curb Marker #3348 – COMESA with das RS-222 adhesive from das Manufacturing, Inc. or approved equal. Installation shall meet all application procedures as specified by the manufacturer of the markers. Markers shall be installed on the top of the curb, facing the street, as shown below: | L-1-45

- 12-foot catch basin width or less – 1 marker at center of basin
- 13- to 21-foot catch basin widths – 2 markers at 3 feet from each end of basin.
- 22-foot catch basin width or more – 3 markers – 2 at 3 feet from each end and 1 at the center of the basin

4. Water quality inlets, bio-filters, basins, and bio-swales will be required to be in place and maintained per the California BMP Handbook and replaced per the manufacturer's recommendations for the life of the project. | L-1-46

5. The WQMP must include a schedule for maintenance of the BMPs, reporting of the maintenance, a maintenance agreement that will be recorded against the property, detailed training materials, training schedules, and training reporting. | L-1-47

6. A Storm Water Pollution Prevention Plan (SWPPP) will be required for the site during construction pursuant to the Santa Ana Regional Water Quality Control Board requirements. | L-1-48

SECTION 4.7 LAND USE

1. This section should provide a more complete discussion of the City of Costa Mesa's General Plan land use designation of "Fairgrounds" and its floor area ratio limitation of 0.10. Although, the General Plan does not establish a trip budget for this property, the City's General Plan traffic model assumed 1,800 average daily vehicle trips for this site. Consistency with these key-planning assumptions needs to be included in the Final EIR. Absent specific building square footages, City staff cannot perform the FAR consistency analysis or concur that the proposed project is consistent with the City's General Plan and Zoning Code.
  - L-1-49
  - L-1-50
  - L-1-51
2. The land use analysis does not address how master plan implementation (growth in fair attendance, opening of amphitheater, etc.) will impact surrounding land uses. What about activities that occur in the Fairground's parking lots such as used automobile sales and vehicle road testing/driving schools? This analysis request was made in our response to the NOP.
  - L-1-52
  - L-1-53

SECTION 4.8 NOISE

1. Again, it very difficult for the reader to understand the growth assumptions used in the DEIR analyses. This section states its primary focus is the use of the facilities other than during the summer Fair. Yet in the Traffic section, the DEIR states a 37% growth potential for the Fair. The extension to 21 days should also be discussed. Was not the traffic noise associated with an increase in Fair attendance must be analyzed (See page 4.8-27). Revisions to the noise analysis, as it relates to corrected traffic generation, should be included in the Final EIR.
  - L-1-54
  - L-1-55
  - L-1-56
2. The extension of the Fair length and assumptions for growth are an integral part of the Master Plan. The noise impacts generated from the Fair extension/growth should be modeled and compared to existing Fair operations.
  - L-1-57
3. The arena is proposed to be relocated, yet no analysis is provided of the anticipated noise impacts related to this new location. The Final EIR should include this information.
  - L-1-58
4. An exhibit should note the location of the "nearest residence" to the Fairgrounds where the 58 dBA is measured.
  - L-1-59
5. Although City noise standards technically do not apply to the operation of the Fairgrounds, it would be helpful to understand how the proposed Master Plan compares to City's standards. As requested in our NOP response, the noise analysis should use the Costa Mesa Noise Ordinance and 2000 General Plan for thresholds and the
  - L-1-60

- determination of adverse impacts. The noise analysis should take into consideration the entire perimeter of the Fairgrounds property, not just a single residence to the north. | L-1-61
- 6. Mitigation Measure 8-2: Why is this measure not being applied to "Fair" concerts? The amphitheater is currently not being used during the Fair. This mitigation measure is extremely vague; the project is to re-open the amphitheater. The EIR should identify what shall be done to mitigate noise impacts, who is responsible, and the timing. | L-1-62  
| L-1-63
- 7. The Draft EIR states that in respect to the use of the amphitheater the noise levels at 947 Serra Way could exceed the 1990 Order's nighttime noise standards (page 4.8-25) even if the existing berm is not removed. Recent advertisements indicate the 32<sup>nd</sup> Board of Directors' intent to use the amphitheater during this year's Fair (LA Times April 24, 2003). How will the 1990 Noise Order be complied with? | L-1-64  
| L-1-65

SECTION 4.12 TRAFFIC AND CIRCULATION

- 1. TABLE 4.12.G should be expanded to show baseline average daily traffic (ADT) counts, the project's incremental increase, and total weekend ADT. | L-1-66
- 2. The Parking analysis is incomplete and inadequate as presented in the DEIR. As stated previously and requested in the City's NOP response, detailed parking statistics should be provided with and without the proposed project. How does the proposed 37% increase in Fair attendance impact onsite parking facilities? Staff does not agree that since a "recreational trip is discretionary", if parking is unavailable that the motorist will seek alternative recreational opportunities. It is more likely that the motorist will seek alternative parking in the surrounding residential areas or on other adjacent public or institutional properties. | L-1-67  
| L-1-68  
| L-1-69
- 3. How will parking demand be met for the reopened amphitheater? Will valet parking be used? What is the potential for amphitheater parking occurring in offsite residential neighborhoods? | L-1-70  
| L-1-71  
| L-1-72
- 4. This section lacks discussion of mass transit opportunities and improvement methods to offset the expanded use of the Fairgrounds. | L-1-73
- 5. Figure 4.12.1, Study Area: Include Newport South/Mesa Drive and Fairview Road/Arlington Drive intersections' and Arlington Drive roadway segment east of Fairview Road in the analysis. | L-1-74
- 6. Page 4.12-4, Existing Traffic Volumes, last paragraph: The analysis was limited to weekend peak hour and weekend daily conditions. It is acknowledged that weekend trip generation to the site is higher than weekday on a daily basis. However, the weekday trip generation is more concentrated during evening hours resulting in significant traffic | L-1-75

- impacts to several intersections in the vicinity of Fairgrounds. This is evident by the extended vehicle queues and major delays observed at several intersections during the Orange County Fair weekday evening peak-hour between 5:00 PM and 6:00 PM. L-1-75
7. Analysis is not provided for a future year scenario. The City requires an analysis of the Project completion year, for which a growth factor of 1 percent per year should be assumed, in addition to traffic from other approved projects. This analysis should be included in the document. L-1-76
  8. In addition, analysis of General Plan conditions with the proposed project should be included. This analysis can be limited to a weekday evening peak hour analysis. L-1-77
  9. Page 4.12-5, Interim Event: Page 4.12.17 identifies that "concert events not associated with the Fair have the greatest potential to impact the surrounding roadways and intersections... traffic associated with a concert event outside of a Fair weekend is analyzed as part of the interim event." Peak concert event conditions, however, are not evaluated. The Traffic and Circulation Section 4.12 and Appendix G, Traffic Study page 31, should address concert peak hour conditions relative to this scenario. L-1-78
  10. Page 4.12-5, Level of Service: Include analysis of the weekday PM peak hour under each scenario based on the above. L-1-79
  11. Page 4.12-5: Provide separate graphics documenting traffic demands for the Typical Weekend, Interim Event, and Fair Event scenarios illustrating the cumulative one-day trip demands in and out of the Fairgrounds, with ADT ingress and egress volumes identified at each driveway location surrounding the site. This typical TIA component is needed to fully understand traffic distribution and associated impacts. L-1-80
  12. Figure 4.12.2: Include the intersections of Fairview/Arlington, NB Newport/Mesa, and SB Newport/Mesa. L-1-81
  13. Table 4.12.A: Include columns for weekday PM peak hour analysis. Include the intersections of Fairview/Arlington, NB Newport/Mesa, and SB Newport/Mesa. L-1-82
  14. Table 4.12.B: Assume one-half of a 4-lane or 6-lane roadway capacity as applicable to determine Newport Boulevard one-way capacities. This assumption was used in the City of Costa Mesa General Plan traffic analysis. Use 8-lane capacity for Harbor Boulevard n/o Adams Avenue. Provide a column identifying the Level of Service / LOS for each arterial based on County roadway capacity values. L-1-83  
L-1-84
  15. Figure 4.12.3: See comment to Figure 4.12.2. L-1-85

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| 16. Table 4.12.C: See comment to Table 4.12.A.   | L-1-86 |
| 17. Table 4.12.D: See comment to Table 4.12.B.   | L-1-87 |
| 18. Page 4.12-12, 1 <sup>st</sup> Paragraph: Revise text to include the theoretical daily capacity for Newport Boulevard.  | L-1-88 |
| 19. Page 4.12-12, second paragraph: Identify the specific peak hour being analyzed.  | L-1-89 |
| 20. Page 4.12-12, third paragraph: The report identifies that the level of service calculation "does not accurately reflect actual traffic conditions. During the Fair event, the circulation system surrounding the OCFEC accommodates a significant amount of traffic and congestion is experienced...." Well-organized Police and Fairgrounds event management plans and transportation system management measures are implemented; however, acute traffic congestion is annually observed during high attendance periods. This underscores the City's concern with respect to Fair operations and need for a complete assessment of impacts and mitigations. | L-1-90 |
| 21. The traffic volumes at several intersections during the Fair Event are identified as being significantly lower than volumes for the Interim Event. Critical locations where lower than expected volumes are noted include:   | L-1-91 |
| • Newport Boulevard southbound right-turn to westbound Fair Drive;   |        |
| • Entrances to the Fairgrounds from westbound Fair Drive;  | L-1-92 |
| • Harbor Boulevard southbound left-turn and northbound right-turn to Fair Drive; and,  | L-1-93 |
| • Fairview Road southbound through volume at Adams Avenue.   | L-1-94 |
| 22. In general, the report identifies lower volumes during the Fair operations than for the Interim event scenario. This is counter-intuitive particularly based on trip generation figures provided in the report. The Interim event trip generation was based on attendance of 25,000. The Fair trip generation was based on the 2002 attendance of 900,000 over the 17-day Fair event, translating to an average 53,000 attendees per day, assuming a constant attendance level on weekdays and weekends. This discrepancy requires reevaluation.   | L-1-95 |
| 23. Furthermore, attendance during peak demand periods has significantly exceeded the averaged daily figure of 53,000, and the Master Plan proposal will further increase attendance levels. Impacts resulting during the existing and Project peak attendance periods are not evaluated in the report, and need to be fully assessed to understand the implications of your project.  | L-1-96 |



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|--|------------------------|
| <p>24. The last sentence identifies that "Fairview at I-405 and Harbor at Adams experience an increase of more than 6,000 daily trips during the Fair event." However, the traffic volumes destined to the annual Fair event do not reflect this increase.</p>   | L-1-97                 |
| <p>25. Figure 2.12.4: See comment to Figure 4.12.2. Reassess traffic volumes based on above comments.</p>  | L-1-98                 |
| <p>26. Table 4.12.E: Re-analyze traffic volumes and ICU's based on above comments.</p>   | L-1-99                 |
| <p>27. Table 4.12.F: See comment to Table 4.12.B. The traffic volumes on SB Newport Boulevard between Bristol and Mesa are similar to that for the Interim Event scenario. A reduction in traffic volumes for SB Newport Boulevard between Mesa and Fair is noted when compared to Interim Event Scenario. These volumes do not reflect the expected higher traffic generation during the annual Fair event. Provide a column identifying the Level of Service for each arterial based on County roadway capacity values.</p>  | L-1-100<br><br>L-1-101 |
| <p>28. Page 4.12-17, Project Traffic Generation: Provide a table quantifying the trip generation rates for the Fair, itemized per each specific development improvement. Clearly outline the bases and methodology for these assumptions. The trip generation was based on a total 2002 attendance figure of 900,000 divided by 17, the total number of Fair days. Attendance is not evenly distributed throughout this period; therefore, existing and projected data should be conservatively analyzed based on the peak attendance days and periods. As previously stated, analysis of the weekday PM peak hour is also needed to determine the impact of arrival traffic on the circulation system. While the weekend traffic may be higher than weekday traffic, the concentration of traffic during the weekday evening peak period is found to impact several intersections in the area.</p>            | L-1-102<br><br>L-1-103 |
| <p>29. Page 4.12-17, third paragraph: The study indicates that reopening of the Pacific Amphitheater would potentially generate traffic, however, the following sentence identifies that the concert trip generation is already accounted for in the Fair trip generation. Appendix E identifies that the Amphitheater is a non-contributing factor. Since the amphitheater was not in operation during the period, which established the trip generation rate, an increase in attendance is now expected with opening of the amphitheater. Trip generation for concerts should be identified and added to the Fair trip generation values for weekend and PM weekday conditions. Note that twenty-one concerts are currently planned between July 11 and August 3, 2003, prior to and during the upcoming Fair event, with many to be held on weekdays. Show times appear to typically start after the PM</p> | L-1-104                |

peak period, however, early arrivals will occur and impacts should therefore be fully evaluated. Reference Page 3-13 Project Objectives, stating to "Develop and implement... the Pacific Amphitheater in a manner that will minimize adverse impacts to surrounding neighborhoods."

L-1-104

- 30. Page 4.12-17, fourth paragraph: The paragraph notes that the main constraining factor is considered to be on-site parking. However, in-depth discussion and analysis is lacking on parking demand and supply, and measures to accommodate parking increases. This issue requires detailed assessment and is considered a significant omission in the draft EIR. Include a separate discussion of Fair and Interim event parking providing detailed discussion of operations, supply and demand, and measures to accommodate the projected growth in patronage.

L-1-105

L-1-106

- 31. Page 4.12-17, fifth paragraph: Describe each land use change and associated calculations for traffic generation increases, for the assumed Fair event growth potential of 37 percent, and 39 percent for the Interim event. As previously mentioned, the trip generation basis and methodology for Fair and Interim events should be explained in detail and documented.

L-1-107

- 32. Page 4.12-18, Fair Event Trip Generation: Analyze the expected increase in 1) cumulative; 2) daily average; and, 3) peak day attendance and trip demands derived from both land use changes and from extending the length of the Fair. Due to the proposed land use changes, a 37 percent growth potential was established, equating to an attendance figure of 1,233,000 for the 17-day fair event. This figure was then applied to the 21-day event to derive the average daily attendance of 58,715. Note that based on the 17 day event, the average daily attendance would be 72,529, significantly higher than the study assumes. Increased attendance will occur by extending the Fair event to 21 days, and this needs to be accurately quantified.

L-1-108

L-1-109

The Traffic Study provides detail on Fair Event trip generation. An Average Vehicle Occupancy (AVO) of 2.5 was applied to 52,941-person attendance resulting in 21,176 daily vehicle trips. This is incorrect as these represent the number of vehicles inbound to the site. These vehicles also leave following the event and therefore the actual trip generation is 42,352 vehicles. There is no accounting for any other trips related to event-support. Assuming this trip generation and the growth rate provided, the Fair event would generate approximately 46,972 vehicle trips with the Master Plan, resulting in a growth of 4,620 vehicle trips. This is higher than 2,310 used for the analysis. Please refer to other comments regarding the assumed future attendance figure.

L-1-110

L-1-111

Increased vehicular trips will also impact traffic-related air quality and noise impacts. These analyses should also be revised to reflect corrected traffic generation forecasts.

L-1-112

Based on assumptions provided in the traffic study, a total of 8,050 vehicle trips would occur during the Saturday peak hour (42,352 x 0.19). Of these, approximately 68 percent of trips are inbound, representing 5,470 trips, and 32 percent of trips are outbound, representing 2,580 trips. The vehicle trips at Fairground entrances do not account for these trips. At the two driveways listed, 232 inbound trips and 537 outbound trips are shown. Other intersections leading to the Fairgrounds, including Harbor Boulevard at Fair Drive and Fairview Road at Adams Avenue, do not account for the remaining traffic volumes that can be expected during the peak hour.

L-1-113

33. As noted, the study does not account for the number of peak days during the Fair event where attendance is demonstrably higher than the averaged daily attendance value. It also appears the Fair event trip generation analysis does not incorporate the Pacific Amphitheater. These three elements, not assessing the increase in average daily attendance resulting from extending the Fair's duration, higher demands during the peak attendance days/periods, and inclusion of amphitheater generation demands, in addition to incorrect estimation of vehicle trip generation entail, significant report omissions.

L-1-114

34. Page 4.12-18, Table 4.12.G, Interim Event Trip Generation: The Indian Pow Wow was held from Friday through Sunday. A weekday PM peak hour analysis should therefore be conducted to determine the impacts of such events during weekdays.

L-1-115

35. Trip generation for the interim event was based on an assumed growth potential of 39 percent. As stated, the basis for this assumption should be described, and the maximum expected attendance be documented.

L-1-116

The Traffic Study provides detail on Interim Event trip generation. An Average Vehicle Occupancy (AVO) of 2.5 was applied to a 10,124-person attendance resulting in 4,050 daily vehicle trips. This is incorrect since this assumption only represents the number of inbound vehicles to the site. These same vehicles also leave so the actual average daily trip generation is 8,100 vehicles. Furthermore, there is no accounting for any other trips related to event-support. Using trip generation and the growth rate provided, the interim event would generate approximately 11,260 vehicle trips with the Master Plan, resulting in a daily growth of at least 3,160 vehicle trips. This is higher than 1,580 used for the analysis.

L-1-117

36. Relative to the "Interim event with Concert", the peak demand period varies from the "Interim Event" period. It is unclear when and how other Interim events coincide with a Concert event, such as Speedway. The OCFEC may either overlap Concert events with Interim events, or hold concerts exclusively during a select period. Given the likely probability of either occurrence, an exclusive Concert scenario should be analyzed as a distinctly separate event from the Interim scenario, with the associated evaluation of peak hour demands and impacts. L-1-118
37. Page 4.12-18: The use of amphitheater should be documented. Unless there is a restriction on the use of amphitheater during weekdays, a weekday PM peak hour analysis should be conducted for Concert events. Also, analysis of the Interim Event with Concert on weekdays should be included. The difference in weekend trip generation between Interim Event and Interim Event with Concert is over 10,000 vehicles. The additional trips for Concert are concentrated during the arrival and departure period, resulting in significant impacts to adjacent roadways. Such impacts were not identified in the analysis and should be incorporated. L-1-119  
L-1-120
38. Page 4.12-19: See prior comment regarding analysis of the Pacific Amphitheater. L-1-121
39. Figure 4.12.5, 4.12.6, Trip Distribution: Trip distribution should originate "to" and destined "from" specific Fair driveway parking lot locations, and accordingly identified. The trip assignment for Fair trips does not reflect this distribution. A total of 33 percent of trips, 24 percent from Newport Boulevard south and 9 percent from Mesa Drive, would be turning right on Fair Drive from southbound Newport Boulevard. This translates to 99 trips based on trip generation (300 x 0.33). However, only 56 trips were shown at this location. Prior comments to page 4.12-18 above regarding attendance and trip increases need to be incorporated. Trip assignments should accordingly be verified and detailed distribution at entry gates included. L-1-122  
L-1-123
40. Table 4.12.H: Revise per prior comments. L-1-124
41. Table 4.12.I: See prior comment to Table 4.12.B. L-1-125
42. Page 4.12-25, second paragraph: See prior comments regarding the Concert event and requirement for further analysis. It is currently unclear to what extent the amphitheater will be utilized, and what schedule, days and times, various amphitheater events will occur. In addition to quantifying impacts, special mitigation measures need to be stated regarding coordination of various interim commercial ventures around a Pacific Amphitheater event, to minimize on-street L-1-126  
L-1-127

- impacts and assure adequate facilities exist to accommodate demands. This may include commitments to schedule weekday amphitheater events no earlier than 8 PM, and prohibit scheduling other Interim events such as Speedway concurrently with high demand concert events. L-1-127
43. Please refer to prior comments regarding Fair trip generation and background traffic volumes collected during Fair event. The study identifies no significant impacts due to measurement of traffic during peak hour or day periods. For example, traffic volumes with an expected daily attendance of 53,000 are significantly lower at several key locations when compared to an event with a daily attendance of less than 10,000. Therefore, the findings of this analysis are questionable. The fourth paragraph in this page mentions this fact by stating, "(the analysis) does not accurately reflect actual conditions." Therefore these findings cannot adequately determine the range of impacts and mitigation measures needed, and necessitates further analysis. L-1-128
44. Figure 4.12.8: Same prior comment to 4.12.2. L-1-129
45. Table 4.12.J: Same comment to Table 4.12.B. L-1-130
46. Figure 4.12.9: Same comment to Table 4.12.2. L-1-131
47. Table 4.12.K: Same comment to Table 4.12.E. L-1-132
48. Table 4.12.L: Same comment to Table 4.12.F. L-1-133
49. Page 4.12-30, first paragraph: Several sections throughout the report identify that "traffic congestion occurs and will continue to occur on the major streets surrounding and providing access to the Fairgrounds". The traffic analysis does not address these conditions and should be revised to show findings that justify this factual statement. The report also mentions that "traffic congestion is of limited duration and therefore capital measures are not necessary". The report should state that in addition to the Fair event, many other significant Interim and Pacific Amphitheater events are being held. These events have and will continue to impact several roadways and intersections adjacent to the Fairgrounds throughout the year. Capital improvement mitigation measures were established in the prior OCFC Master Plan update, which assumed facilities and uses at lower thresholds than now proposed. Consistent with the previous EIR and the current Master Plan, physical improvements are necessary in the area to adequately accommodate planned activities. At a minimum, the mitigation measures previously adopted, relative to the Traffic and Circulation element, need to be restated. Further mitigation measures may need to be provided based on findings derived from these noted comments. L-1-134  
L-1-135  
L-1-136

- 50. Page 4.12-30, Access and Circulation: The Southbound Newport Boulevard entrance at Mesa Drive is not identified. Also, all neighboring properties providing parking facilities serving the various fairground events, and associated arrangements for such use need to be described and quantified.

L-1-137  
L-1-138
- 51. Page 4.12-31: Provide a detailed analysis of parking demands and accommodations. Significant impacts are not identified relative to parking, however, the analysis was not conducted to support this finding. The report statement, "if parking is not available, motorists will be forced to seek alternative recreational opportunities", is apparently the basis for not conducting a detailed review of parking needs. One of the significance criteria to be evaluated is, "the project results in insufficient parking capacity on-site or off-site." The proposed Master Plan results in an attendance increase of 37 percent, and, accordingly, translates to a 37 percent increase in parking demand.

L-1-139
- 52. Significant analysis was given to parking supply/demand issues within the prior Master Plan EIR update, and this same careful assessment of impacts, provisions, and mitigations is required within the current EIR. Substantial parking encroachment has occurred within adjacent neighborhoods by Fairgrounds patrons, resulting in significant impacts. Accordingly, the City has implemented a number of specially designated "resident-only" parking areas to minimize these impacts. Furthermore, impacts to the traffic circulation system are annually observed due to inadequate parking provisions, particularly during peak Fair event periods. Should the proposed Master Plan parking supply not meet the anticipated demand through on-site and off-site arrangements these impacts will significantly increase. Therefore, a parking study needs to be conducted and provisions established to clearly accommodate forecasted demands established.

L-1-140  
L-1-141  
L-1-142
- 53. Section 5.0, Cumulative Impacts: A Project completion year analysis, which includes traffic from other projects and a growth factor of 1 percent per year, should be conducted for the weekday and weekend peak hours for Interim Event, Interim Event with Concert, Fair Event, and Fair Event with Concert, in addition to a separate Pacific Amphitheater event analysis.

L-1-143  
L-1-144
- 54. General Plan Analysis: An analysis of General Plan traffic conditions with the proposed Project should be conducted for weekday evening peak hour for Interim Event, Interim Event with Concert, Fair Event, Fair Event with Concert, and Pacific Amphitheater event.

L-1-145
- 55. The City's General Plan assumes 1,800 average daily vehicle trips for the Fairgrounds site. All mitigation measures for General Plan were

L-1-146

based on that assumption. However, based on traffic reports for Fairgrounds Master Plan, peak trip generation during interim events would be approximately 11,260 vehicle trips for Interim Events, 22,114 vehicle trips for Interim Events with Concert, and 46,972 daily vehicle trips during the Fair. These are considerably higher than the assumed trip generation for City's General Plan. L-1-146

56. Mitigation Measures: The Fairgrounds adopted the attached list of 26 mitigation measures with the prior OCFEC EIR, following detailed interagency coordination. Please include the attached measures in the current EIR, based on the general consistency between Master Plans. Please discuss with the City any variations proposed to these mitigations. Identify additional mitigation measures following the review of these comments and reassessment of the traffic analysis. Capital improvements previously adopted include: L-1-147

A. Improve Arlington Drive adjacent to the property meeting the Orange County Transportation Authority Master Plan of Arterial Highways standards. (Prior EIR Mitigation No. T1) L-1-149

B. Dual right-turn lanes from Southbound Newport Boulevard to westbound Fair Drive. (Prior EIR Mitigation No. T4) L-1-150

The City recommends that the following mitigation measures be included in the EIR:

A. Coordinate improvement plans for a bicycle trail and landscaping, proposed by the City along southbound Newport Boulevard adjacent to Fairgrounds, with on-site improvements. L-1-151

B. Provide a Closed Circuit Television (CCTV) camera at the Fairview Road/Fair Drive intersection providing input to the City Hall Transportation Operations Center and OCFEC to monitor peak period traffic conditions. L-1-152

C. Prepare parking management and contingency plans establishing parking accommodations for the various OCFEC events. L-1-153

**SECTION 5 CUMULATIVE IMPACTS**

1. Please add to the cumulative impacts list 1901 Newport Plaza, a recently approved 161 residential condominium project in addition to the existing commercial building. L-1-154

**SECTION 9 ALTERNATIVES TO THE PROPOSED PROJECT**

1. No Project Alternative: In the Land Use discussion, please compare existing building square footages with City's adopted FAR of 0.10. L-1-155

2. Mixed-Use Commercial: This alternative includes two 50,000 square-foot restaurants. Is that the correct size? This seems out of scale since the City's largest restaurants is only 15,300 square feet in size. L-1-156

**ATTACHMENTS**



FAIRGROUNDS MITIGATION MEASURES SUMMARYPublic Services and Utilities

- S01. The Fairgrounds will ensure that water conservation and water management techniques are incorporated into the design, construction and operation of new and existing facilities as they are built or renovated. These would include water-saving fixtures and the practice of irrigating landscaping during early morning or evening hours to reduce the amount of water lost to evapotranspiration.
- S02. The Fairgrounds will utilize drought resistant landscaping and will actively investigate and implement where feasible a reclaimed water supply from the Orange County Water District "Green Acres" project for outdoor landscaping.
- S03. The Fairgrounds will protect existing water meters and backflow devices.
- S04. The Fairgrounds will ensure that lighting of all facilities, including parking areas, is adequate so that emergency response is facilitated and criminal incidents on-site and in the vicinity of the Fairgrounds are discouraged.
- S05. The Fairgrounds will coordinate with the Costa Mesa Police Department to ensure that the adequacy of emergency response and access plans associated with implementation of the Updated Master Plan is maintained and coordinate on-site security with police service, in order to ensure that adequate security is provided for all Fairgrounds events.
- S06. The Fairgrounds will coordinate with the Costa Mesa Fire Department as new construction is begun and renovations are made in order to ensure that proper safety devices and precautions are incorporated into the facilities.
- S07. The Fairgrounds will coordinate with the Costa Mesa Fire Department to ensure that the adequacy of emergency response and access plans associated with the Updated Master Plan is maintained.
- S08. The Fairgrounds will ensure that the lighting of all facilities, including parking areas, is adequate so that emergency response is facilitated.

Traffic and Circulation

Specific mitigation measures to roadway segments are as follows:

- T1. The Fairgrounds will complete improvements on the south side along Arlington Drive. These improvements include street pavement, curbs and gutters, storm drain, sidewalks, and full driveway improvements. These improvements will be designed in accordance with the City of Costa Mesa's standards for design and construction.

- T2. The Fairgrounds will maintain on-site monitoring of gate queuing requirements and relocate the collection points as needed, in order to assure compliance with the requirements identified in the P&D traffic study, and the Greer & Company parking and circulation study.
- T[A]. The Fairgrounds will be responsible to widen for an eastbound left turn lane on Fair Drive at Vanguard (Gate 2) and at the Main Gate (Gate 1) to provide for dual left turn lanes.
- T3. The Fairgrounds will extend the southbound right turn pocket at the Mesa Drive entrance (Gate 10) to provide a minimum 500 feet of storage, and they will reconstruct, if feasible, the northwesterly curb return at the Mesa Drive entrance to increase the curb return radius.
- T4. The Fairgrounds will reconstruct the northwesterly curb at the intersection of southbound Newport Boulevard and Fair Drive, as necessary, to allow for dual right turn lanes.
- T5. The Fairgrounds will monitor and modify gate collection points to minimize queuing problems.
- T6. The Fairgrounds will participate on a fair share basis with the City of Costa Mesa in signal control system modifications on Newport Boulevard, Fairview Road, and Fair Drive, as appropriate.
- T7. The Fairgrounds will be responsible on a fair share basis for the installation of Changeable Message Signs on Newport Boulevard and other appropriate locations.
- T8. The Fairgrounds will be responsible on a fair share basis to ensure the design and implementation of a right turn lane on eastbound Fair Drive at southbound Newport, with participation by the City of Costa Mesa.

#### Traffic Control Measures

The Fairgrounds shall implement temporary traffic control measures during the peak hours when the Fair is occurring in order to mitigate the operational deficiencies resulting from high peak hour volumes. The following measures were previously identified through various studies. All proposed measures affecting City surface streets shall be coordinated with and approved by the City of Costa Mesa Police and Engineering staff prior to implementation.

#### Afternoon Peak Period (Typically 4:00 p.m. to 7:00 p.m.)

- T9. The Fairgrounds will be responsible during a Fair event to require, through the utilization of road delineators and temporary signage, all southbound through traffic on Newport Boulevard to turn right at Arlington Drive during the evening peak period when a Fair event occurs, with coordination with the City of Costa Mesa Caltrans.
- T10. The Fairgrounds will be responsible during a Fair event to assign, through the use of road delineators and temporary signage, the No. 4 through lane at the intersection of southbound Newport Boulevard and Mesa Drive as a second right turn lane into the Mesa Drive entrance, with coordination with the City of Costa Mesa and Caltrans.

- T11. The Fairgrounds will be responsible during a Fair event to reassign, through the use of road delineators and temporary signage, the No. 1 northbound through lane at the intersection of northbound Newport Boulevard and Del Mar Avenue to be an optional through or left turn lane, with coordination with the City of Costa Mesa and Caltrans.

Traffic control - Fair Event Evening Closure Period

During the period from 10:00 p.m. to midnight during Fair events the following traffic control measures should be implemented:

- T12. The Fairgrounds will be responsible to implement road delineators directing all westbound traffic on Del Mar Avenue to turn right on northbound Newport Boulevard, with coordination with the City of Costa Mesa. This would necessitate a Detour Plan in the area south of the Fairgrounds. (See in Exhibit 26, Appendix 7.)
- T13. The Fairgrounds will be responsible to assign, through the use of message signs and road delineators, the No. 1 southbound through lane at the intersection of southbound Newport Boulevard and Fair Drive as a second left turn lane onto eastbound Fair Drive (see Exhibit 25, Appendix 7), with coordination with the City of Costa Mesa and Caltrans.
- T14. The Fairgrounds will take measures to designate the No. 2 southbound lane at the OCFG Main Entrance/Fair Drive intersection to allow a second left turn lane.

Parking

It is the policy of the Fair board that parking for non-Fair events be accommodated on-site. To achieve this policy the following measures will be implemented:

For amphitheater events:

1. Ensure that parking areas used for the swap meet are cleared and made available on weekend evenings when a crowd of more than 30,000 is expected, especially Saturday nights.

For swap meet events:

2. Provide access to other on-site parking areas (approximately 900 spaces), such as the camping/overflow area and other minor parking areas in order to provide adequate on-site parking.
3. Implement uniform delineation of 8-1/2 foot by 19 foot parking stalls with 23 foot aisles where feasible on all on-site parking areas.

## Retention/Irrigation

TC-12

### General Description

Retention/irrigation refers to the capture of stormwater runoff in a holding pond and subsequent use of the captured volume for irrigation of landscape or natural pervious areas. This technology is very effective as a stormwater quality practice in that, for the captured water quality volume, it provides virtually no discharge to receiving waters and high stormwater constituent removal efficiencies. This technology mimics natural undeveloped watershed conditions wherein the vast majority of the rainfall volume during smaller rainfall events is infiltrated through the soil profile. Their main advantage over other infiltration technologies is the use of an irrigation system to spread the runoff over a larger area for infiltration. This allows them to be used in areas with low permeability soils.

Capture of stormwater can be accomplished in almost any kind of runoff storage facility, ranging from dry, concrete-lined ponds to those with vegetated basins and permanent pools. The pump and wet well should be automated with a rainfall sensor to provide irrigation only during periods when required infiltration rates can be realized. Generally, a spray irrigation system is required to provide an adequate flow rate for distributing the water quality volume (LCRA, 1998). Collection of roof runoff for subsequent use (rainwater harvesting) also qualifies as a retention/irrigation practice.

### Inspection/Maintenance Considerations

Pollutant removal rates are estimated to be nearly 100% for all pollutants in the captured and irrigated stormwater volume. However, relatively frequent inspection and maintenance is necessary to verify proper operation of these facilities.

### Maintenance Concerns, Objectives, and Goals

- Sediment Accumulation
- Mechanical malfunction
- Vector Control

### Targeted Constituents

- ✓ Sediment ■
- ✓ Nutrients ■
- ✓ Trash ■
- ✓ Metals ■
- ✓ Bacteria ■
- ✓ Oil and Grease ■
- ✓ Organics ■
- ✓ Oxygen Demanding ■

Legend (Removal Effectiveness)

- Low
- High
- ▲ Medium



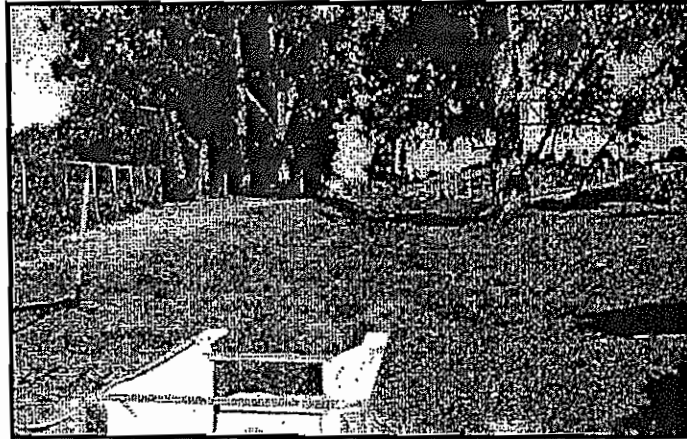
## TC-12

## Retention/Irrigation

Inspection Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ The irrigation system should be inspected and tested (or observed while in operation) to verify proper operation multiple times annually. Two of these inspections should occur during or immediately following wet weather. Any leaks, broken spray heads, or other malfunctions with the irrigation system should be repaired immediately.</li> </ul>	Frequently (3-6 times per year)
Maintenance Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ The upper stage, side slopes, and embankment of a retention basin must be mowed regularly to discourage woody growth and control weeds.</li> </ul>	Frequently
<ul style="list-style-type: none"> <li>■ Remove sediment from inlet structure/sediment forebay, and from around the sump area at least 2 times annually or when depth reaches 3 inches. When sediment in other areas of the basin fills the volume allocated for sediment accumulation, all sediment should be removed and disposed of properly.</li> <li>■ Grass areas in and around basins must be mowed at least twice annually to limit vegetation height to 18 inches. More frequent mowing to maintain aesthetic appeal may be necessary in landscaped areas. When mowing is performed, a mulching mower should be used, or grass clippings should be caught and removed.</li> <li>■ Debris and litter will accumulate near the basin pump and should be removed during regular mowing operations and inspections. Particular attention should be paid to floating debris that can eventually clog the irrigation system.</li> </ul>	Semi-annual
<ul style="list-style-type: none"> <li>■ The pond side slopes and embankment may periodically suffer from slumping and erosion, although this should not occur often if the soils are properly compacted during construction. Regrading and revegetation may be required to correct the problems.</li> </ul>	Infrequently

# Vegetated Swale

# TC-30



### Maintenance Concerns, Objectives, and Goals

- Channelization
- Vegetation/Landscape Maintenance
- Vector Control
- Aesthetics
- Hydraulic and Removal Efficacy

### General Description

Vegetated swales are open, shallow channels with vegetation covering the side slopes and bottom that collect and slowly convey runoff flow to downstream discharge points. They are designed to treat runoff through filtering by the vegetation in the channel, filtering through a subsoil matrix, and/or infiltration into the underlying soils. Swales can be natural or manmade. They trap particulate pollutants (suspended solids and trace metals), promote infiltration, and reduce the flow velocity of stormwater runoff. Vegetated swales can serve as part of a stormwater drainage system and can replace curbs, gutters and storm sewer systems. Therefore, swales are best suited for residential, industrial, and commercial areas with low flow and smaller populations.

### Inspection/Maintenance Considerations

It is important to consider that a thick vegetative cover is needed for vegetated swales to function properly. Usually, swales require little more than normal landscape maintenance activities such as irrigation and mowing to maintain pollutant removal efficiency. Swales can become a nuisance due to mosquito breeding in standing water if obstructions develop (e.g., debris accumulation, invasive vegetation) and/or if proper drainage slopes are not implemented and maintained. The application of fertilizers and pesticides should be minimized.

### Targeted Constituents

✓ Sediment	▲
✓ Nutrients	●
✓ Trash	●
✓ Metals	▲
✓ Bacteria	●
✓ Oil and Grease	▲
✓ Organics	▲
✓ Oxygen Demanding	▲

### Legend (Removal Effectiveness)

- Low
- High
- ▲ Medium



## TC-30

## Vegetated Swale

Inspection Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ Inspect after seeding and after first major storms for any damages.</li> </ul>	Post construction
<ul style="list-style-type: none"> <li>■ Inspect for signs of erosion, damage to vegetation, channelization of flow, debris and litter, and areas of sediment accumulation. Perform inspections at the beginning and end of the wet season. Additional inspections after periods of heavy runoff are desirable.</li> </ul>	Semi-annual
<ul style="list-style-type: none"> <li>■ Inspect level spreader for clogging, grass along side slopes for erosion and formation of rills or gullies, and sand/soil bed for erosion problems.</li> </ul>	Annual
Maintenance Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ Mow grass to maintain a height of 3-4 inches, for safety, aesthetic, or other purposes. Litter should always be removed prior to mowing. Clippings should be composted.</li> <li>■ Irrigate swale during dry season (April through October) or when necessary to maintain the vegetation.</li> <li>■ Provide weed control, if necessary to control invasive species.</li> </ul>	As needed (frequent, seasonally)
<ul style="list-style-type: none"> <li>■ Remove litter, branches, rocks blockages, and other debris and dispose of properly.</li> <li>■ Maintain inlet flow spreader (if applicable).</li> <li>■ Repair any damaged areas within a channel identified during inspections. Erosion rills or gullies should be corrected as needed. Bare areas should be replanted as necessary.</li> </ul>	Semi-annual
<ul style="list-style-type: none"> <li>■ Declog the pea gravel diaphragm, if necessary.</li> <li>■ Correct erosion problems in the sand/soil bed of dry swales.</li> <li>■ Plant an alternative grass species if the original grass cover has not been successfully established. Reseed and apply mulch to damaged areas.</li> </ul>	Annual (as needed)
<ul style="list-style-type: none"> <li>■ Remove all accumulated sediment that may obstruct flow through the swale. Sediment accumulating near culverts and in channels should be removed when it builds up to 3 in. at any spot, or covers vegetation, or once it has accumulated to 10% of the original design volume. Replace the grass areas damaged in the process.</li> <li>■ Rototill or cultivate the surface of the sand/soil bed of dry swales if the swale does not draw down within 48 hours.</li> </ul>	As needed (infrequent)

## **Vegetated Swale**

**TC-30**

### **Additional Information**

Recent research (Colwell et al., 2000) indicates that grass height and mowing frequency have little impact on pollutant removal. Consequently, mowing may only be necessary once or twice a year for safety or aesthetics or to suppress weeds and woody vegetation.

### **References**

Metropolitan Council, Urban Small Sites Best Management Practices Manual. Available at: <http://www.metrocouncil.org/environment/Watershed/BMP/manual.htm>

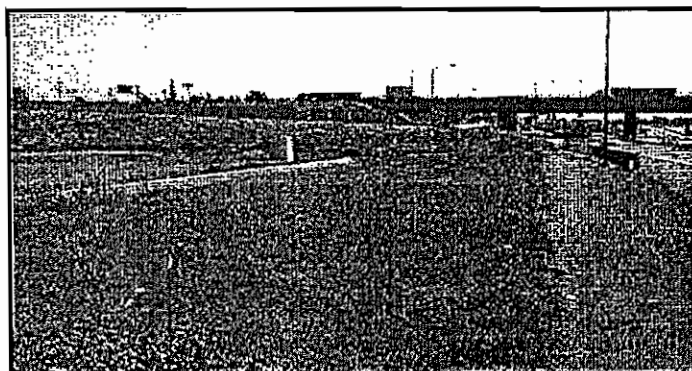
U.S. Environmental Protection Agency, Post-Construction Stormwater Management in New Development & Redevelopment BMP Factsheets. Available at: [cfpub.epa.gov/npdes/stormwater/menuofbmps/bmp\\_files.cfm](http://cfpub.epa.gov/npdes/stormwater/menuofbmps/bmp_files.cfm)

Ventura Countywide Stormwater Quality Management Program, Technical Guidance Manual for Stormwater Quality Control Measures. July, 2002.



# Vegetated Buffer Strip

TC-31



### Maintenance Concerns, Objectives, and Goals

- Clogged Soil or Outlet Structures
- Invasive Species Management
- Vegetation/Landscape Maintenance
- Erosion
- Channelization of Flow
- Aesthetics

### General Description

Grassed buffer strips (vegetated filter strips, filter strips, and grassed filters) are vegetated surfaces that are designed to treat sheet flow from adjacent surfaces. Filter strips function by slowing runoff velocities and allowing sediment and other pollutants to settle and by providing some infiltration into underlying soils. Filter strips were originally used as an agricultural treatment practice and have more recently evolved into an urban practice. With proper design and maintenance, filter strips can provide relatively high pollutant removal. In addition, the public views them as landscaped amenities and not as stormwater infrastructure. Consequently, there is little resistance to their use.

### Inspection/Maintenance Considerations

Vegetated buffer strips require frequent landscape maintenance. In many cases, vegetated buffer strips initially require intense maintenance, but less maintenance is needed over time. In many cases, maintenance tasks can be completed by a landscaping contractor. Maintenance requirements typically include grass or shrub-growing activities such as irrigation, mowing, trimming, removal of invasive species, and replanting when necessary. Buffer strips require more tending as the volume of sediment increases. Vegetated buffer strips can become a nuisance due to mosquito breeding in level spreaders (unless designed to dewater completely in 72 hours or less) and/or if proper drainage slopes are not maintained.

### Targeted Constituents

- ✓ Sediment ■
- ✓ Nutrients ●
- ✓ Trash ▲
- ✓ Metals ■
- ✓ Bacteria ●
- ✓ Oil and Grease ■
- ✓ Organics ▲
- ✓ Oxygen Demanding ▲

### Legend (Removal Effectiveness)

- Low
- High
- ▲ Medium



## TC-31

## Vegetated Buffer Strip

Inspection Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ Once the vegetated buffer strip is established, inspect at least three times per year. Repair all damage immediately.</li> <li>■ Inspect buffer strips after seeding and repair as needed.</li> </ul>	Post construction
<ul style="list-style-type: none"> <li>■ Inspect buffer strip and repair all damage immediately.</li> <li>■ Inspect soil and repair eroded areas.</li> </ul>	After major storms
<ul style="list-style-type: none"> <li>■ Inspect for erosion or damage to vegetation, preferably at the end of the wet season to schedule summer maintenance and before major fall runoff to be sure the strips are ready for winter. However, additional inspection after periods of heavy runoff is desirable.</li> <li>■ Inspect pea-gravel diaphragm/level spreader for clogging and effectiveness and remove built-up sediment.</li> <li>■ Inspect for rolls and gullies. Immediately fill with topsoil, install erosion control blanket and seed or sod.</li> <li>■ Inspect to ensure grass is well established. If not, either prepare soil and reseed or replace with alternative species. Install erosion control blanket.</li> <li>■ Check for debris and litter, and areas of sediment accumulation.</li> </ul>	Semi-annual
Maintenance Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ Water plants daily for 2 weeks after construction.</li> </ul>	Post construction
<ul style="list-style-type: none"> <li>■ Mow regularly to maintain vegetation height between 2 - 4 inches, and to promote thick, dense vegetative growth. Cut only when soil is dry to prevent tracking damage to vegetation, soil compaction and flow concentrations. Clippings are to be removed immediately after mowing.</li> <li>■ Remove all litter, branches, rocks, or other debris. Damaged areas of the filter strip should be repaired immediately by reseeding and applying mulch.</li> <li>■ Regularly maintain inlet flow spreader.</li> <li>■ Irrigate during dry season (April through October) when necessary to maintain the vegetation.</li> </ul>	Frequently, as needed
<ul style="list-style-type: none"> <li>■ Remulch void areas.</li> <li>■ Treat diseased trees and shrubs, remove dead vegetation.</li> </ul>	Semi-annual
<ul style="list-style-type: none"> <li>■ Remove sediment and replant in areas of buildup. Sediment accumulating near culverts and in channels should be removed when it builds up to 3 in. at any spot, or covers vegetation.</li> <li>■ Limit fertilizer applications based on plant vigor and soil test results.</li> <li>■ Rework or replant buffer strip if concentrated flow erodes a channel through the strip.</li> </ul>	Annual

## **Vegetated Buffer Strip**

**TC-31**

### **Additional Information**

Recent research (Colwell et al., 2000) indicates that grass height and mowing frequency have little impact on pollutant removal. Consequently, mowing may only be necessary once or twice a year for safety or aesthetics or to suppress weeds and woody vegetation.

Trash tends to accumulate in swale areas, particularly along highways. The need for litter removal is determined through periodic inspection, but litter should always be removed prior to mowing.

### **References**

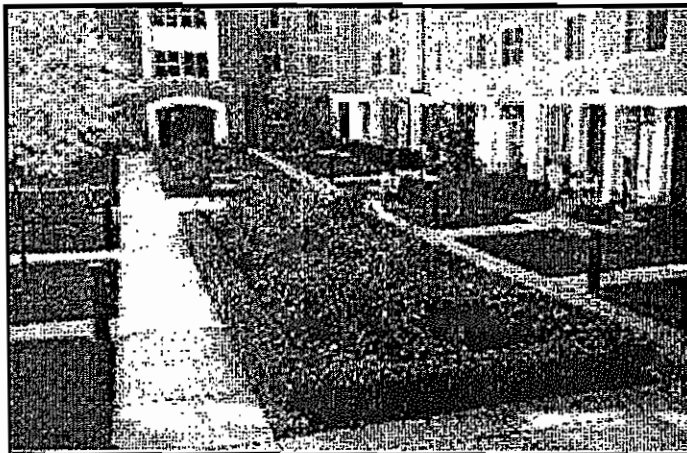
Metropolitan Council, Urban Small Sites Best Management Practices Manual. Available at: <http://www.metrocouncil.org/environment/Watershed/BMP/manual.htm>

U.S. Environmental Protection Agency, Post-Construction Stormwater Management in New Development & Redevelopment BMP Factsheets. Available at: [cfpub.epa.gov/npdes/stormwater/menuofbmps/bmp\\_files.cfm](http://cfpub.epa.gov/npdes/stormwater/menuofbmps/bmp_files.cfm)

Ventura Countywide Stormwater Quality Management Program, Technical Guidance Manual for Stormwater Quality Control Measures. July, 2002.

## Bioretention

## TC-32



### Maintenance Concerns, Objectives, and Goals

- Clogged Soil or Outlet Structures
- Invasive Species
- Vegetation/Landscape Maintenance
- Erosion
- Channelization of Flow
- Aesthetics

### General Description

The bioretention best management practice (BMP) functions as a soil and plant-based filtration device that removes pollutants through a variety of physical, biological, and chemical treatment processes. These facilities normally consist of a grass buffer strip, sand bed, ponding area, organic layer or mulch layer, planting soil, and plants. The runoff's velocity is reduced by passing over or through a sand bed and is subsequently distributed evenly along a ponding area. Exfiltration of the stored water in the bioretention area planting soil into the underlying soils occurs over a period of days.

### Inspection/Maintenance Considerations

Bioretention requires frequent landscaping maintenance, including measures to ensure that the area is functioning properly, as well as maintenance of the landscaping on the practice. In many cases, bioretention areas initially require intense maintenance, but less maintenance is needed over time. In many cases, maintenance tasks can be completed by a landscaping contractor, who may already be hired at the site. In cold climates the soil may freeze, preventing runoff from infiltrating into the planting soil.

### Targeted Constituents

✓ Sediment	■
✓ Nutrients	▲
✓ Trash	■
✓ Metals	■
✓ Bacteria	■
✓ Oil and Grease	■
✓ Organics	■
✓ Oxygen Demanding	■

Legend (*Removal Effectiveness*)

- Low
- High
- ▲ Medium



## TC-32

## Bioretention

Inspection Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ Inspect soil and repair eroded areas.</li> </ul>	Monthly
<ul style="list-style-type: none"> <li>■ Inspect for erosion or damage to vegetation, preferably at the end of the wet season to schedule summer maintenance and before major fall runoff to be sure the strips are ready for winter. However, additional inspection after periods of heavy runoff is desirable.</li> </ul>	Semi-annual inspection
<ul style="list-style-type: none"> <li>■ Inspect to ensure grass is well established. If not, either prepare soil and reseed or replace with alternative species. Install erosion control blanket.</li> </ul>	
<ul style="list-style-type: none"> <li>■ Check for debris and litter, and areas of sediment accumulation.</li> </ul>	
<ul style="list-style-type: none"> <li>■ Inspect health of trees and shrubs.</li> </ul>	
Maintenance Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ Water plants daily for 2 weeks.</li> </ul>	At project completion
<ul style="list-style-type: none"> <li>■ Remove litter and debris.</li> </ul>	Monthly
<ul style="list-style-type: none"> <li>■ Remove sediment.</li> <li>■ Remulch void areas.</li> <li>■ Treat diseased trees and shrubs.</li> <li>■ Mow turf areas.</li> <li>■ Repair erosion at inflow points.</li> <li>■ Repair outflow structures.</li> <li>■ Unclog underdrain.</li> <li>■ Regulate soil pH regulation.</li> </ul>	As needed
<ul style="list-style-type: none"> <li>■ Remove and replace dead and diseased vegetation.</li> </ul>	Semi-annual
<ul style="list-style-type: none"> <li>■ Add mulch.</li> <li>■ Replace tree stakes and wires.</li> </ul>	Annual
<ul style="list-style-type: none"> <li>■ Mulch should be replaced every 2 to 3 years or when bare spots appear. Remulch prior to the wet season.</li> </ul>	Every 2-3 years, or as needed

**Additional Information**

Landscaping is critical to the function and aesthetic value of bioretention areas. It is preferable to plant the area with native vegetation, or plants that provide habitat value, where possible. Another important design feature is to select species that can withstand the hydrologic regime they will experience. At the bottom of the bioretention facility, plants that tolerate both wet and dry conditions are preferable. At the edges, which will remain primarily dry, upland species will be the most resilient. It is best to select a combination of trees, shrubs, and herbaceous materials.

**References**

Metropolitan Council, Urban Small Sites Best Management Practices Manual. Available at: <http://www.metrocouncil.org/environment/Watershed/BMP/manual.htm>

## **Bioretention**

**TC-32**

Model Urban Runoff Program: A How-To Guide for Developing Urban Runoff Programs for Small Municipalities. Prepared by City of Monterey, City of Santa Cruz, California Coastal Commission, Monterey Bay National Marine Sanctuary, Association of Monterey Bay Area Governments, Woodward-Clyde, Central Coast Regional Water Quality Control Board. July, 1998, revised February, 2002.

U.S. Environmental Protection Agency, Post-Construction Stormwater Management in New Development & Redevelopment BMP Factsheets. Available at:  
[cfpub.epa.gov/npdes/stormwater/menuofbmps/bmp\\_files.cfm](http://cfpub.epa.gov/npdes/stormwater/menuofbmps/bmp_files.cfm)

Ventura Countywide Stormwater Quality Management Program, Technical Guidance Manual for Stormwater Quality Control Measures. July, 2002.

# Water Quality Inlet

# TC-50

## General Description

Water quality inlets (WQIs), also commonly called trapping catch basins, oil/grit separators or oil/water separators, consist of one or more chambers that promote sedimentation of coarse materials and separation of free oil (as opposed to emulsified or dissolved oil) from stormwater. Some WQIs also contain screens to help retain larger or floating debris, and many of the newer designs also include a coalescing unit that helps promote oil/water separation.

These devices are appropriate for capturing hydrocarbon spills, but provide very marginal sediment removal and are not very effective for treatment of stormwater runoff. WQIs typically capture only the first portion of runoff for treatment and are generally used for pretreatment before discharging to other best management practices (BMPs).

## Inspection/Maintenance Considerations

High sediment loads can interfere with the ability of the WQI to effectively separate oil and grease from the runoff. During periods of high flow, sediment can be resuspended and released from the WQI into surface waters. Maintenance of WQIs can be easily neglected because they are underground. Establishment of a maintenance schedule is helpful for ensuring proper maintenance occurs. The required maintenance effort will be site-specific due to variations in sediment and hydrocarbon loading. Since WQI residuals contain hydrocarbon by-products, they may require disposal as hazardous waste. Many WQI owners coordinate with waste haulers to collect and dispose of these residuals.

## Maintenance Concerns, Objectives, and Goals

- High Sediment Loads
- Hazardous Waste
- Vector Control

## Targeted Constituents

- ✓ Sediment ●
- ✓ Nutrients ●
- ✓ Trash ▲
- ✓ Metals ●
- ✓ Bacteria ●
- ✓ Oil and Grease ▲
- ✓ Organics ●
- ✓ Oxygen Demanding ●

Legend (Removal Effectiveness)

- Low      ■ High
- ▲ Medium



**TC-50**

**Water Quality Inlet**

Inspection Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ Inspect after every storm event to determine if maintenance is required.</li> </ul>	Monthly during the wet season, or after significant rain events
Maintenance Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>■ Clean out and dispose of accumulated oil, grease, and sediments. Remove accumulated trash and debris. The clean out and disposal techniques should be environmentally acceptable and in accordance with local regulations.</li> </ul>	Annual, before the wet season, or more frequent as needed

**Additional Information**

Since WQIs can be relatively deep, they may be designated as confined spaces. Caution should be exercised to comply with confined space entry safety regulations if it is required.

**References**

<http://www.co.pierce.wa.us/pc/services/home/environ/water/swm/sppman/bmpt1.htm>



# Multiple Systems

# TC-60

### General Description

A multiple treatment system uses two or more BMPs in series. Some examples of multiple systems include: settling basin combined with a sand filter; settling basin or biofilter combined with an infiltration basin or trench; extended detention zone on a wet pond.

### Inspection/Maintenance Considerations

Each of the separate treatment processes will require maintenance as described in the previous fact sheets. For example, multiple system comprises of a biofilter combined with an infiltration basin would require the inspection and maintenance considerations outlined on the fact sheet for each process.

Inspection Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>Refer to individual treatment control factsheets</li> </ul>	As needed
Maintenance Activities	Suggested Frequency
<ul style="list-style-type: none"> <li>Refer to individual treatment control factsheets</li> </ul>	As needed

### Maintenance Concerns, Objectives, and Goals

May include the following:

- Accumulation of Metals
- Aesthetics
- Channelization of Flow
- Clogging of the Outlet
- Endangered Species Habitat Creation
- Erosion
- Groundwater Contamination
- Hazardous Waste
- Hydraulic and Removal Efficiency
- Invasive Species Management
- Mechanical Malfunction
- Pollutant Breakthrough
- Re-suspension of settled material
- Sediment and Trash Removal
- Sedimentation
- Vector/Pest Control
- Vegetation harvesting
- Vegetation/Landscape Maintenance

### Targeted Constituents

- ✓ Sediment ■
- ✓ Nutrients ●
- ✓ Trash ■
- ✓ Metals ■
- ✓ Bacteria ▲
- ✓ Oil and Grease ■
- ✓ Organics ■
- ✓ Oxygen Demanding ■

#### Legend (Removal Effectiveness)

- Low
- High
- ▲ Medium



## CITY OF COSTA MESA

- L-1-1 Comment noted. The comment is introductory and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.
- L-1-2 Comment noted. The comment is an opinion that the DEIR does not contain sufficient information regarding analysis of impacts. The OCFEC respectfully disagrees with this opinion. Because there are no facts or analysis provided in the comment, no further response is necessary.
- L-1-3 The 32nd DAA respectfully disagrees with the assertion that the project description is vague. A specific description of the building program is provided on pages 3-3 through 3-10, both in qualitative and quantitative terms. Demolition of facilities is clarified in Attachments A and B in Volume VI of the FEIR. Some of the buildings and/or facilities to be demolished include the amphitheater berm, snack bar, restrooms, Arlington Theater, a portion of the Equestrian Center, Little Theater, and the Amphitheater tickets and concessions buildings. In strict quantitative terms, growth assumptions are not part of the project description. The proposed project is a response to a desired programming for users primarily during weekends. However, for the purpose of understanding potential circulation impacts, three separate and specific scenarios were developed and, where warranted, accompanying mitigation measures were identified. It should be noted that this approach was discussed and agreed upon with City of Costa Mesa representatives as part of this EIR's scoping consultation process in a meeting held on June 28, 2002. These scenarios are discussed in detail in Section 4.12 of the EIR. Greater detail is provided in responding to the City's specific circulation comments (L-1-66 through L-1-153).
- Proposed improvements, including removal/replacement of the existing structures, are included in the Project Description, specifically Table 3.2.A, and further clarified in Attachment A in Volume VI of the FEIR. Attachment A includes a table that focuses on the existing and proposed buildings.
- L-1-4 Traffic and parking demand created by project improvements are discussed in Section 4.12, Traffic and Circulation. Specific responses to the City's comments pertaining to traffic and parking occur on the following pages.
- L-1-5 Please see Response to Comment L-1-67.
- L-1-6 The proposed project inherits a long history of noise concerns—specifically pertaining to the Pacific Amphitheater—with the City of Costa Mesa and surrounding neighborhoods. This history is provided in detail in Section 4.8 of the EIR. Though unorthodox in a typical urban setting, the issue of OCFEC noise being “disturbing to neighboring residents” has a measured threshold as determined by Orange County Superior Court Cases No. 42 07 28

and 55 65 08 (1990 Order) (as opposed to a typical municipal noise regulating ordinance). Indeed, page 5 of the City of Costa Mesa's comments on the Draft EIR recognizes that the "City noise standards technically do not apply to the operation of the Fairgrounds." Table 4.8.L in the EIR provides a succinct and concise analysis of potential amphitheater noise impacts. The mitigation measure provided on the following page (4.8-27 in the EIR) is a means to abide by the 1990 Order. Please refer to Response to Comment I-3-35 for noise concerns related to non-Fair concert events and Response to Comment L-1-62 for noise mitigation for the amphitheater.

Technical issues aside, the 32nd DAA is committed to working with the City and neighbors through noise monitoring of the 2003 Summer Fair and to responding to concerns regarding events on the Fairgrounds.

Mitigation Measure 8-2 has been amended to address year-round events in the amphitheater, and is therefore consistent with the 1990 Order.

- L-1-7 The desire of the City for the 32nd DAA to reduce non-Fair concert sound amplification is noted. Please refer to Response to Comment I-3-39 for noise mitigation at the amphitheater.
- L-1-8 The OCFEC is constrained by the 1990 Order pertaining to use of the Pacific Amphitheater. The noise limits set out in the 1990 Order have been agreed to by the OCFEC/32nd DAA and will be enforced by the 32nd DAA.

According to CEQA Guidelines, there is no changed condition or circumstance brought about by the proposed project that would produce a significant impact on the environment that would require mitigation. Applicable CEQA Guidelines are as follows:

- 1) **Section [15126.4(2)(3)], Environmental Effects Requiring Mitigation.** These guidelines specify that mitigation is only required to reduce or off-set project related impacts which are judged to be significant.
- 2) **Section [15126.4(a)(4)(A)].** This section requires that there be a connection or nexus between required mitigation and project effects.

As indicated in Responses to Comments L-1-6 and L-1-7, the City's desires are noted and will be provided to the decision makers for consideration. Please refer to Response to Comment L-1-6 regarding mitigation of Fair concerts.

- L-1-9 The 32nd DAA respectfully disagrees with the City's assertion that the DEIR must be recirculated for public review. All data and analysis necessary for a complete and thorough EIR have been included in the DEIR. In addition, through these Responses to Comments and the additional data and discussion provided herein, it is the judgement of the 32nd DAA that the EIR is complete and fully complies with the requirements of CEQA for (1) reasonable and thorough analyses of all required environmental topics, (2) public

disclosure of all related project impacts, (3) inclusion of mitigation to reduce or avoid project-related significant impacts, and (4) analysis of project alternatives. The 32nd DAA appreciates the willingness of the City to cooperatively implement the proposed project. It is the sincere hope of the 32nd DAA that the Responses to Comments and supporting information clarifies the analyses provided in the DEIR and will be acceptable to the City. Furthermore, it should be clear to the City, upon review of the whole record, that the City's concerns have been fully addressed in this EIR process and that the City concurs with the 32nd DAA determination that the environmental impacts of the proposed project have been adequately addressed and there is no requirement to recirculate the DEIR.

Finally, it is the expressed intent of the 32nd DAA to continue its commitment (as has been demonstrated during the Master Plan process) to work with the City and its neighbors to address issues, such as noise, related to events occurring on the Fairgrounds.

L-1-10 Comment noted. The 32nd DAA has fully addressed each City comment and concern expressed in the City's comment letter dated May 1, 2003. All necessary revisions to the DEIR to address City concerns are included within the Response to Comments document and/or Errata found in Volume VI of the FEIR. Furthermore, these responses directly address each City concern and, where necessary, further explain the analyses in the DEIR or provide additional data or information to clarify the analyses. Based upon the extensive analyses within the DEIR and supplemental explanation of the analyses included in the Response to Comments, the 32nd DAA considers the EIR to be complete and will forward the entire record, including the City's comments, to the decision makers for consideration prior to taking action on certification of the EIR and on the Master Plan. Finally, the 32nd DAA respects and sincerely appreciates the City's concerns, assistance, and continued involvement.

L-1-11 Social effects is a general term pertaining to the OCFEC Mission Statement, and the Master Plan's consistency with this Statement. As noted in the Master Plan,

"The mission of the Orange County Fair and Exposition Center is to provide educational, entertainment, and recreational opportunities for the general public and preserve the heritage of California agriculture. This is accomplished while promoting and showcasing the talents, interests, and accomplishments of the citizens of California, especially Orange County residents."

L-1-12 The site plan that is used to illustrate the proposed project for this EIR is slightly different from the concept plan used for the Project Description portion of the Notice of Preparation primarily because the NOP utilized a conceptual level design, and the EIR utilized a refinement of this concept; an illustrative plan.

In terms of design, the proposed project connected and reoriented two multi-use buildings located near the arrival court. The total square footage of these buildings did not change (40,000 square feet). Also, the festival grounds, located in the northwest portion of the site, were further refined from a completely paved area to retaining some of the existing trees,

using semi-permeable cover, and maintaining the existing parking area at the west end of the grounds. The livestock structure was identified in the DEIR; however, the under-roof square footage remained unchanged.

Finally, further refinements resulted in a reduced square footage in the proposed exhibit space from the project description in the NOP (352,300 square feet) to the project description described in Section 3.0 of the EIR (344,380 square feet).

- L-1-13 The project is not to amend the existing Master Plan, but is to adopt an entirely new Master Plan for long-term development of the OCFEC and supporting infrastructure. All information and references to previous site development, site plans, and relevant studies are included in the DEIR and Appendices for information only. Because the proposed project is being considered in light of the current DEIR, there is little or no relevance in considering out-of-date environmental studies and accompanying actions, miscellaneous reports, and past plans for Fairgrounds improvements. Because the comment does not mention why these reports and studies might be relevant, there is no apparent advantage in further investigating these reports and studies.
- L-1-14 The amphitheater was constructed in 1983. The berm was constructed in 1983. Past operating schedules and ownership are irrelevant to the EIR process as required by CEQA. Without some justification or reasoning as to relevancy to the discussion of environmental effects of the project, it is not evident from the comment how the analyses in the DEIR will benefit from inclusion of the requested information. Therefore, no further response is provided.
- L-1-15 Please refer to Response to Comment L-1-3.
- L-1-16 Please refer to Response to Comment L-1-3.
- L-1-17 Please refer to Response to Comment L-1-3.
- L-1-18 The proposed project is a Master Plan, as described in Chapter 3.0 of the DEIR. This Master Plan is articulated by a site illustrative plan, developed at a conceptual level only. This illustrative plan, as well as the Master Plan document, addresses landscaping and other design components at the conceptual level, providing an understanding of the potential difference between existing conditions and the future direction of the Fairgrounds. As such, design components such as landscaping, signs, lighting and Fairgrounds graphics are described as to general location and in terms of guidelines that are appropriate for this level of detail.

As stated in the DEIR, it is anticipated that the Master Plan will be implemented in phases. These phases will encompass the respective portions of the Master Plan from the conceptual stage into the schematic, design development, and eventually the construction drawing stages. During this normal design process, the exact number, location, and type of landscaping will be determined. The degree of environmental review to be conducted for

these projects will be commensurate with the degree of their consistency with the Master Plan, as determined at that time.

- L-1-19 Access to the Amphitheater will be limited to the interior of the Fairgrounds. No separate access to the Amphitheater, outside of the Fairgrounds proper, will be provided. The comment does not include an explanation of how the additional detail requested to be added to the information already provided in the project description would more clearly explain the proposed project. Without such reasoning or evidence suggesting additional environmental impacts that would result from inclusion of this information, no additional analysis is required to adhere to CEQA requirements. Again, this level of architectural detail will be determined at a later date.
- L-1-20 Please see the statistical summary tables included as Attachment A for clarification of existing and proposed facility square footages.
- L-1-21 Comment noted. However, it should be pointed out that Orange Coast College is also in this area. Figure 3.1.3 and 4.7.1 will be amended and included in the Errata in Volume VI of the FEIR. The comment and the clarification of the figure has no effect on the analyses in the DEIR.
- L-1-22 Comment noted. Figure 3.2.1 is a conceptual site plan, intended for illustrative purposes only. There is no legend for this Figure. The comment has no effect on the analyses in the DEIR. OCFEC staff will meet with City representatives and share project design details as the Master Plan is implemented, as appropriate, when the information is developed.
- L-1-23 Please see Attachment A.

The City of Costa Mesa's General Plan was revised and adopted in January 2002, after the OCFEC Master Plan process had commenced. Page LU-38 of the City of Costa Mesa's General Plan provides the following language related to the OCFEC:

The property is owned by the State of California, and the City has limited permitting authority; however, it is the goal of the City to work closely with the State to ensure that impacts associated with the development and use of the site are appropriately addressed and mitigated. Of particular concern are traffic-related impacts and land use compatibility.

The maximum allowable floor area ratio for this designation shall be 0.10.

Page 4.7.1 of the DEIR states that "Although the OCFEC is exempt from municipal land use policies by virtue of it being owned by the State of California, the City of Costa Mesa's General Plan addresses the proposed project area."

These statements are consistent in that there is a general understanding and concurrence that local land use policies and regulations are not applicable to the OCFEC. However, implicit in the City's General Plan and in the OCFEC policy is the continuing commitment to

work together to maintain the general goal of land use compatibility. Attachment A contains a series of tables that show implementation of the OCFEC Master Plan will result in a FAR of approximately 0.08. Should, at a future date, the amphitheater be completely enclosed for noise mitigation purposes, the FAR will then be approximately 0.11.

- L-1-24 Please see Attachment A.
- L-1-25 Comment noted and page 3-10 of the DEIR will be amended and included in the Errata in Volume VI of the FEIR. Please see Attachment A (Statistical Summary).
- L-1-26 Storm drain improvements are predicated upon the phased implementation of the Master Plan. Further, timing of storm drain improvements is dependent upon OCFEC and City funding opportunities. The OCFEC will coordinate with the City to establish a schedule and funding responsibility. There currently is no firm construction time table for this improvement.
- L-1-27 This project detail is included on pages 3-12, 4.1-3, and 4.1-11 of the DEIR. There are currently five light standards; up to seven additional standards are planned. Because no environmental issue is brought forward by the comment, no further response is required.
- L-1-28 Comment noted. Please see Attachments A and B and the information on pages 3-14 through 3-16 of the DEIR.
- L-1-29 The parking lots are depicted in Figures 3.1.2 and 3.2.1 and are further described in text in Response to Comments L-1-67, L-1-105, and L-1-106. The information provided in the DEIR is complete and is detailed enough to form the basis of complete analysis of all related environmental effects of the proposed project. The comment does not include explanation of how the additional detail requested to be added to the information already provided in the project description would benefit the environmental analyses in the DEIR. Without such reasoning or evidence suggesting additional environmental impacts that would result from inclusion of this information, no additional analysis or additional information is required to complete CEQA requirements.
- L-1-30 The information provided in the DEIR is complete and is detailed enough to form the basis of complete analysis of all related environmental effects of the proposed project. The comment does not include explanation of how the additional detail requested to be added to the information already provided in the project description would benefit the environmental analyses in the DEIR. Without such reasoning or evidence suggesting additional environmental impacts that would result from inclusion of this information, no additional analysis or additional information is required to complete CEQA requirements.
- L-1-31 Details of the proposed sign on Newport Boulevard are not available at this time. As noted on page 3-12, this sign will be located in approximately the same location as the existing billboards. Consistent with the practice of the OCFEC and City (as evidenced in the recent Newport Boulevard landscaping and the City's sign proposal), details of this sign will be

shared with City of Costa Mesa representatives when available. Because design details are not known at this time and cannot be reasonably forecast, further analysis of this project feature would be speculative.

The proposed sign along Fairview Road will be no more than eight feet above ground level and therefore well within the visual context of the area as defined by trees and fencing in the immediate vicinity and multi-story structures in the general area. There is no reasonably foreseeable environmental effect of the sign in combination with other project improvements.

- L-1-32 Please refer to Response to Comment L-1-31.
- L-1-33 There are no plans at this time to remove the existing billboards.
- L-1-34 Additional view simulations are not necessary for a complete project analysis. The analyses in the DEIR are complete as presented and show no significant impact. As noted in previous responses, compliance with City standards is not required. Again, the 32nd DAA will continue its commitment to consult with the City as design details for this sign become available.
- L-1-35 Comment noted. The corrections shall be made in the FEIR.
- L-1-36 Comment noted. The 32nd DAA will review the location of shade trees/canopy trees and types of plant materials. The comment is not related to discussion of environmental effects and appears to provide City preferences for planting materials. The comments will be forwarded to the decision makers for their consideration.
- L-1-37 The new light standards would be located outside the coverage area of the View A simulation. Refer to light standard locations used for the photometric study in Appendix B in Volume II of the FEIR.
- L-1-38 The suggested mitigation measure is noted; however, additional mitigation is not necessary to offset project impacts or required by CEQA.
- L-1-39 Disturbed soil will be treated frequently with watering or will be treated with a nontoxic bonding agent as required by existing SCAQMD Rules.
- L-1-40 The 32nd DAA is the Lead Agency responsible for preparation and certification of the EIR. The 32nd DAA has planning and development authority over the OCFEC. The CCA is a joint powers authority responsible for approval of contracts and issuance of Notices to Proceed.
- L-1-41 Please refer to Response to Comment L-1-3.
- L-1-42 Please refer to Response to Comment L-1-18.



- L-1-43 Comment noted. These requirements are currently mandated by existing law and regulation. The 32nd DAA intends to comply with these requirements as stated in Section 4.6.
- L-1-44 Comment noted. The WQMP will include the updated BMP sheets.
- L-1-45 Comment noted. The 32nd DAA will utilize the City of Costa Mesa standard for catch basin stenciling and markers.
- L-1-46 Comment noted. BMPs will be maintained per the California BMP Handbook and the manufacturer's recommendations and replaced when necessary.
- L-1-47 Comment noted. The 32nd DAA will follow the County standards for the WQMP NPDES.
- L-1-48 Comment noted. Project implementation, including site improvements related to water quality sediment control, dust control, and other construction controls is required by existing statute to comply with applicable regulations. This requirement is noted on page 4.6-14 of the DEIR.
- L-1-49 The DEIR discusses the City of Costa Mesa's General Plan land use designation "Fairgrounds" on pages 4.7-3 and 4.7-8. The following text has been added to the FEIR:

[page 4.7-3] Although, the City of Costa Mesa's General Plan recognizes that the City has limited land use control and permitting authority with regard to the OCFEC, the document establishes the maximum allowable floor area ratio (FAR) for the land use designation "Fairgrounds" to be 0.10. FAR is used to express the relationship between the allowable gross floor area of a building (or buildings) and the lot on which the building (or buildings) stand. Table 4.7.A provides the existing FAR for the OCFEC.

**Table 4.7.A: Existing FAR**

Existing Building SF	Gross Acres	FAR
451,685 SF	147 AC (6,403,320 SF)	0.07

Note: Existing building square footage includes roofed structures enclosed on all sides by walls.

[page 4.7-8] Table 4.7.B provides the FAR for the OCFEC after Master Plan implementation. The table provides the FAR for the OCFEC under two Master Plan implementation scenarios. The first assumes the Amphitheater remains uncovered giving the OCFEC an FAR of 0.08. The second scenario assumes that the Amphitheater is covered, giving the OCFEC an FAR of 0.11—1 percent more than the FAR stipulated in the City of Costa Mesa General Plan.

**Table 4.7.A: Master Plan FAR**

	<b>Building SF</b>	<b>Gross Acres</b>	<b>FAR</b>
<b>Master Plan</b>	480,077 SF	147 AC (6,403,320 SF)	0.08
<b>Master Plan (with enclosed Amphitheater)</b>	734,477 SF	147 AC (6,403,320 SF)	0.11

Note: Building square footage includes roofed structures enclosed on all sides by walls.

Please refer to Response to Comment L-1-23.

- L-1-50 The DEIR provides an independently verifiable traffic analysis in Section 4.12. Consistency with a traffic model and assumptions for vehicle trips is not required.

It should be noted that the 32nd DAA consulted actively with the City of Costa Mesa prior to preparing the OCFEC Master Plan traffic analysis that was incorporated into the DEIR. At no time during this consultation did City representatives raise the issue of assigning a trip budget for the OCFEC site, either existing or as planned. Finally, this issue becomes moot since all potential direct circulation impacts were either less than significant or were mitigated to less than significant levels. Because there is no significant traffic impact resulting from the project after mitigation, and because the 32nd DAA and the project would not benefit from enforcing a trip budget program for the site, there is no requirement under CEQA to comply with this request.

- L-1-51 Please refer to Responses to Comments L-1-49 and L-1-23.
- L-1-52 Implementation of the Master Plan is the primary subject (proposed project) of the DEIR. Compatibility issues are addressed throughout the various sections of the document. Please refer to Response to Comment L-1-3.
- L-1-53 The DEIR analyzes all proposed changes in operations and physical changes to site facilities. Ongoing activities are assumed to continue unless specifically noted in the project description. Various events that currently use the OCFEC parking areas are expected to continue, although their location on the project site may be moved if they occur in a parking area that will be developed during project implementation. However, the parking area configuration remains substantially unchanged, with the noted exception of the additional parking area near the equestrian center and Arlington Drive. This new area is primarily intended for parking only.
- L-1-54 Please refer to Response to Comments L-1-3, L-1-6, and L-1-7. As stated in the first paragraph on page 4.8-1, "[T]he primary focus of this [noise] section (as with the rest of the environmental impact report) is the use of the facilities other than during the summer

Fair.” However, Section 4.8 did analyze an event scenario that paralleled the third traffic analysis scenario, Existing Fair Event Plus Master Plan Traffic Noise Levels, as noted in Table 4.8P.

- L-1-55 A primary goal of the OCFEC is to host the annual summer Fair. It was extended by four days (from 17 to 21), not to attract a greater daily attendance, but to specifically reduce daily attendance to facilitate Fair operations. As stated in the first paragraph on page 4.8-1 and in Response to Comment L-1-54, a noise impact analysis conducted for the proposed project focused on the use of the facilities other than during the summer Fair.
- L-1-56 Please refer to Response to Comment L-1-55.
- L-1-57 A primary goal of the OCFEC is to host the annual summer Fair. It was extended by four days (from 17 to 21), not to attract a greater daily attendance, but to specifically reduce daily attendance to facilitate Fair operations. Extension of the summer Fair and a greater gross attendance are not synonymous. Please refer to Response to Comment L-1-3.
- L-1-58 Noise impacts associated with relocation of the arena were addressed in the first paragraph on page 4.8-25, which indicated that noise impacts would be small and negligible.
- L-1-59 The location of the nearest residence in the same neighborhood as 947 Serra Way is described in the text of the EIR on page 4.8-3. For comparison purposes only, application of the 1990 Order to this residence is discussed on page 4.8-8. The information provided in the DEIR is complete and detailed enough to form the basis of the environmental analysis of the proposed project. The comment does not provide an explanation as to how the additional figure requested to be added would benefit the environmental analysis in the DEIR. No rationale as to the use of this information is raised nor is any environmental issue raised in the comment; therefore, no further response is necessary.
- L-1-60 A detailed discussion regarding the regulatory noise environment occurs in the EIR on pages 4.8-6 through 4.8-8, with a conclusion statement located in the third full paragraph on page 4.8-8:

“Therefore, it appears that the most tangible point of reference for determining appropriate noise levels, potential impacts and recommending any necessary mitigation measures is the 1990 Order.”

The City recognizes in this comment that City noise standards do not apply to the operation of the Fairgrounds. While using City standards may provide sound data, it cannot be used for determining thresholds of significance and accompanying mitigation measures in light of the above statement. The noise analysis did take into account areas other than a single residence, as evidenced by Figure 4.8.2 and Tables 4.8.D through 4.8.P. Please also see Response to Comment L-1-8.

- L-1-61 Please refer to Response to Comment L-1-60.

- L-1-62 Mitigation Measure 8-2 will be amended by removing the word “nonfair.” This comment partially quotes the Master Plan objectives, as cited on Page 3-13:

“Develop and implement a Master Plan for the Fairgrounds that will restore concerts, plays and other community events, with the maximum paying guest capacity of 8,500 persons, to the venue known as the Pacific Amphitheater in a manner that will minimize adverse impacts to surrounding neighborhoods.”

The amphitheater will host a range of events, of which concerts may be a portion. The decision to have the amphitheater become a host for concert events (primarily not during the Fair and with an assumed lower ambient noise level) is predicated upon other decisions yet to made, in terms of market research/support, business management, facility testing and facilities operations/control (as discussed with the City and neighbors throughout the Master Plan process). Hence, Mitigation Measure 8-2 is phrased appropriately in anticipation of the steps necessary to begin using this venue again, consistent with the 1990 Order. Should noise from the amphitheater exceed the standards established by the 1990 Order, then Mitigation Measure 8-2 will be warranted. Please also see Response to Comment L-1-8.

- L-1-63 Please refer to Response to Comment L-1-62.
- L-1-64 Please refer to Response to Comment L-1-62.
- L-1-65 Please refer to Response to Comment L-1-62.
- L-1-66 The purpose of Table 4.12.G is to present the project trip generation and incremental traffic growth. Baseline traffic volumes and total weekend ADT (including trip generation) are indicated in previous and subsequent tables, as well as the text of the EIR and TIA for each of the three scenarios. Additionally, the figures illustrate the baseline and with project ADT for each of the three conditions.
- L-1-67 According to the Existing Parking and Master Plan Parking Estimates provided in Appendix A in Volume VI, there are currently approximately 7,600 on-site parking spaces and approximately 10,300 off-site parking spaces available during the annual Fair Event. With the Master Plan, on-site Fair time parking will increase by approximately 140 spaces, while off-site parking will not change. The commentator refers to a “proposed 37 percent increase in Fair attendance.” Page 4.12-17 clearly states that the traffic analysis assumed the *attendance capacity* of the OCFEC would be increased by 39 percent for the interim event and 37 percent for the Fair event. These estimates are based on changes in size and use of various elements of the Fairgrounds amenities, and hence represent the capacity for use, not the typical attraction of all Fairgrounds amenities. Attendance capacity assumes full use of all available facilities at all times for a “worst case” scenario analysis. However, attendance capacity is not equal to an actual increase in attendees to the OCFEC, Fair, or nonfair. However, as stated in the DEIR, with the proposed Master Plan, the Fair period will be extended from 17 to 21 days. When the projected increase in attendance capacity is applied to a 21-day Fair Event, the daily increase in attendance capacity is approximately 10

percent. While on-site Fair time parking is not being increased by 10 percent with the Master Plan, the 32nd DAA is committed to providing additional off-site parking opportunities for Fair patrons that will equal a 70 percent increase or more. One example is the recent agreement between the OCFEC and Experian to utilize Experian's 1,300 space parking structure during Fair Event weekends. A Conditional Use Permit was granted by the Costa Mesa Planning Commission for this arrangement on June 12, 2003. It should be noted that the existing off-site parking space count of approximately 10,300 spaces includes the Experian parking structure even though the 2003 Fair Event will be the first Fair Event to utilize this additional off-site parking opportunity. As a result, the increase in parking between the existing condition at the time of the release of the Notice of Preparation and the condition at project implementation would be approximately 1,440 spaces, equal to a 10 percent increase in Fair parking. As a result, the percent increase in parking spaces will be roughly equal to the percent increase in projected daily attendance.

L-1-68 Please see Response to Comment L-1-67.

L-1-69 Please see Response to Comment L-1-67.

L-1-70 As explained in the DEIR and subsequent responses, during the Fair Event, the amphitheater will host concerts that are currently being held in the Arlington Theater with similar attendance. Parking for these concerts will be the same as for Fair patrons in the on-site and off-site parking lots. During non-Fair event weekends, parking for the 8,500 seat amphitheater will be provided by the approximately 8,900 on-site parking spaces, clearly enough parking to satisfy twice the parking demand for a sold out concert pursuant to the event ratio (AVO) of 2.5 persons per vehicle. Approximately 8,000 additional parking spaces are also available adjacent to the Fairgrounds in the Orange Coast College, Costa Mesa High School, and Davis School parking lots.

L-1-71 Valet parking is not considered in the Master Plan; however, it may be used for specific interim events or concerts.

L-1-72 As stated in Response to Comment L-1-70, approximately 8,900 on-site parking spaces are available for nonfair amphitheater parking. This provides ample parking for patrons attending an event at the reduced capacity amphitheater. However, to minimize on-street impacts and ensure amphitheater use does not conflict with Interim Events occurring on the project site, the project description stipulates that amphitheater events may not be scheduled to begin earlier than 7:30 p.m. on a weekday or within one hour of the commencement or completion of a significant Interim Event (i.e., an event or combination of events with a forecasted attendance of 10,000 persons or more). These stipulations can be found in the Errata in Volume VI of the FEIR. In addition to on-site parking, several off-site parking areas are available for those times when Interim Event parking demand exceeds on-site supply. As a result, there is little potential for amphitheater parking to occur in off-site residential neighborhoods.

- L-1-73 As noted on page CIR-21 of the City's General Plan, the Orange County Transit Authority (OCTA) is currently "the only provider of public bus transportation within the City . . . ." The OCTA operates bus routes that serve the Fairgrounds. Routes are located on Fair Drive and Fairview Road. The Fairgrounds has incorporated many design features into the Master Plan that enhance transit provision to the Fairgrounds. These features include transit stops on Fair Drive and Fairview Road, wide sidewalks around the perimeter of the Fairgrounds, drop-offs at all gates, transportation information kiosks and information center, and preferential parking for high occupancy vehicles. Further, the OCTA was provided a copy of the DEIR and did not submit any comments.
- L-1-74 The intersections of Newport South/Mesa Drive and Fairview Road/Arlington Drive and Arlington Drive east of Fairview Road have been included on Figure 4.12.1. This figure is provided in the Errata in Volume VI of the FEIR.
- L-1-75 The purpose of this analysis was to identify the impacts associated with the greatest potential activity of the proposed Fairgrounds project, the project for which a Master Plan has been prepared and a discretionary action has been requested (which is on the weekend). This was discussed with City staff from both the Community Development and Transportation departments at a prescoping early consultation meeting (June 28, 2002). The approach used in the analysis is consistent with all previous analyses of the Fair (which have been approved by a joint action of the Costa Mesa City Council and the 32nd DAA Board of Directors and represent a worst-case analysis of the Fairgrounds activity).
- L-1-76 Please refer to Responses to Comments L-1-3 and L-1-75. The project applicant is not seeking approvals from the City of Costa Mesa that would normally trigger compliance with City of Costa Mesa traffic study requirements. Rather, the Lead Agency, the 32nd DAA, is responsible for the traffic study. The DEIR has been prepared consistent with applicable provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. According to Section 15130 of the CEQA Guidelines, either a list of probable future projects OR a summary of projections contained in an adopted General Plan may be used to forecast cumulative conditions. The analysis contained in the TIA and DEIR is therefore consistent with CEQA disclosure requirements and CEQA Guidelines.
- L-1-77 Please see Response to Comment L-1-76.
- L-1-78 The analysis of Fairgrounds activity was conducted for a worst-case Saturday during the peak hour (noon) of typical Saturday conditions. Therefore, the highest cumulative interim volume on the peak Saturday includes ambient Saturday traffic and Fairgrounds traffic. The peak period of the amphitheater would be prior to the start of a concert (the hour prior to an 8:00 p.m. start time). This traffic is not captured in the analyzed Saturday noon peak hour. However, the potential trips associated with a concert event are presented in Table 4.12-G. The daily increase in traffic on the study area roadway system due to a concert event has been analyzed. This analysis is provided in both the EIR and the TIA.
- L-1-79 Please see Response to Comment L-1-75.

- L-1-80 The baseline and plus project ADT for all three project scenarios are provided in both the EIR (Section 4.12) and TIA (Volume 5) for all study area roadway segments. The contribution of Fairgrounds traffic is fully accounted for and illustrated in the tables and figures in the EIR and TIA. The analysis that is presented clearly discloses the project contribution of traffic on the adjacent municipal streets and intersections.
- L-1-81 As stated in Response to Comment L-1-74, additional traffic counts were taken, and analyses have been prepared for the Newport South/Mesa Drive, Newport North/Mesa Drive, and Fairview Road/Arlington Drive intersections and the segment of Arlington Drive east of Fairview Road. The intersection analysis has been provided in the Errata in Volume VI of the FEIR. The traffic counts were conducted over the weekend of May 31–June 1 when several interim events were taking place at the Fairgrounds. During this weekend, four events with an approximate attendance of 10,000 were taking place: Heritage India, the Computer Show, an Arcade Game Auction, and Mater Dei High School Grad Night. As discussed in Response to Comments L-1-91 and L-1-95, traffic counts taken during the Fair Event were lower or similar to traffic counts taken during an interim event. As a result, the analysis presented for the May 31–June 1 interim event weekend is also representative of Fair Event conditions. As a result, these traffic volumes can be used to represent both a typical weekend and an interim event condition. The additional locations have been included on Figure 4.12.2. This figure is provided in the Errata in Volume VI of the FEIR.
- L-1-82 Please see Responses to Comments L-1-75 and L-1-81. As stated in Response to Comment L-1-81, additional traffic counts were taken in response to the City's comments. The counts were taken during a typical Marketplace and interim event weekend.
- L-1-83 As stated in the comment, the application of one-half the capacity value of a four- or six-lane roadway is based upon assumption. There is no "standard" value to be used as a threshold for a one-way couplet. Therefore, the volume is presented, and the project increment is clearly indicated. All other roadway volumes are presented with a comparison to estimates of theoretical capacities for multilane, two-way arterial roadways. Again, please refer to Response to Comment L-1-75.
- L-1-84 The volume-to-capacity ratio for the segment of Harbor Boulevard north of Adams Avenue has been revised in the daily roadway analysis tables using eight-lane capacity for this segment of the roadway. The revised tables are provided in the Errata in Volume VI. These tables also include the previously requested analysis of Arlington Drive between Fairview Road and southbound Newport Boulevard. It should be noted that the revised table did not change the conclusions found in the DEIR; there is not a significant impact associated with this revised analysis.
- L-1-85 The intersections of Newport South/Mesa Drive and Fairview Road/Arlington Drive and Arlington Drive east of Fairview Road have been included on Figure 4.12.3. This figure is provided in the Errata in Volume VI of the FEIR.

- L-1-86 Please see Responses to Comments L-1-81 and L-1-82. The additional analysis for the intersections listed by the commentator has been included in Tables K and H in the Errata in Volume VI of the FEIR. The analysis is also provided below. There are no significant impacts associated with the additional analysis.

**Additional Intersection Level of Service Analysis**

	Interim				Fair Event			
	Existing		Plus Project		Existing		Plus Project	
Intersection	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS
Newport Boulevard	0.56	A	0.67	B	0.56	A	0.67	B
Newport Boulevard	0.34	A	0.43	A	0.34	A	0.41	A
Fairview Road/Arlington	0.50	A	0.55	A	0.50	A	0.55	A

- L-1-87 Please see Responses to Comments L-1-83 and L-1-84.
- L-1-88 Please see Response to Comment L-1-83.
- L-1-89 Fair Event peak-hour traffic volumes were observed between 11:00 a.m. and 2:00 p.m. The peak hour at each intersection varies and is shown in the traffic counts that are included as an appendix to the TIA.
- L-1-90 It is acknowledged that the police and Fairgrounds management plans are coordinated to address traffic control during event periods. These services and systems have historically served the City and Fairgrounds well. The TIA that is provided along with these responses provides a complete assessment of the impacts and required mitigation measures for the Master Plan project being proposed.
- L-1-91 As stated in the EIR, the Saturday midday peak hour was selected for evaluation because the ambient traffic in the study area is greatest at that time. According to turnstile counts provided in the 1996 OCFEC Master Plan Traffic/Parking Analysis and confirmed by attendance records since then, arrivals and departures to the Fair Event are greatest during the afternoon hours, after the Saturday midday peak hour. Additionally, the interim event traffic counts were surveyed during a Saturday when several large interim events were taking place at the same time (i.e. Indian Pow Wow, Orange County Marketplace, Mini Meet West 2002, and the Marketplace Car Show). This Saturday was deliberately chosen because it was one of the highest attended interim event Saturdays of the year. Furthermore, the Orange County Marketplace was occurring at the same time as several large interim events. Although Marketplace attendance or trip generation figures are not available, the Marketplace would be expected to have a higher trip generation potential than other events due to the fact that patrons stay for a shorter time at the Marketplace, and patron turnover is higher and more frequent at a Marketplace event. As a result, it is possible that attendance at the OCFEC met or exceeded a one-day Fair Event during the



weekend the interim event traffic volumes were counted. As a result existing Interim Event weekend traffic volumes may be higher than those experienced on a Fair event day.

L-1-92 Please see Response to Comment L-1-91.

L-1-93 Please see Response to Comment L-1-91.

L-1-94 Please see Response to Comment L-1-91.

L-1-95 Please see Response to Comment L-1-91. The commentator's statement, "The interim event trip generation was based on attendance of 25,000," is incorrect. As stated on page 30 of the TIA, "The average daily attendance for the top 10 interim events in 2001 and 2002 is 10,124 persons." The interim event trip generation was based on an average attendance of 10,124 persons. However, the traffic volume surveys were completed on a weekend when the largest interim event (the Indian Pow Wow) had an attendance of 25,000. Two other interim events and the Orange County Marketplace also took place on this weekend. The report identifies lower volumes during the Fair than for the interim events because the volumes are based on the actual traffic counts taken during Fair and interim event weekends. As stated previously, several interim events and the Orange County Marketplace were taking place on the survey weekend, resulting in a much higher attendance than typically experienced during an interim event weekend.

L-1-96 Attendance figures for the Fair Event are based on attendance data provided by the OCFEC. It is acknowledged that the Master Plan proposal may further increase attendance capacity levels. However, the Fair Event will be extended to a 21-day event, rather than a 17-day event. As a result, any increase in attendance will be spread over a longer period of time, thereby lessening the number of patrons per day. Impacts of the project during a typical Fair Event day have been fully disclosed in the DEIR and the TIA.

L-1-97 This sentence refers to a comparison of daily traffic volumes illustrated in Figure 4.12.2, Existing Typical Weekend Condition, and Figure 4.12.4, Existing Annual Fair Event Condition. These figures show that during a Fair Event, daily traffic volumes on Fairview south of I-405 will increase from 39,775 to 46,626 daily trips, an increase of 6,851 trips. On Harbor Boulevard south of Adams Avenue, daily traffic will increase from 43,028 daily trips to 49,479 daily trips, an increase of 6,451 daily trips.

L-1-98 It is assumed that the commentator is referring to Figure 4.12.4, not Figure 2.12.4 because there is no Figure 2.12.4 in the DEIR. The intersections of Newport South/Mesa Drive and Fairview Road/Arlington Drive and Arlington Drive east of Fairview Road have been included on Figure 4.12.4. This figure is provided in the Errata.

L-1-99 Please see Response to Comment L-1-86.

L-1-100 Please see Responses to Comments L-1-83, L-1-84, and L-1-91 through L-1-94.

- L-1-101 Please see Responses to Comments L-1-83, L-1-84, and L-1-91 through L-1-94.
- L-1-102 Trip generation for the Fair Event was not calculated based on trip generation rates; rather, as stated in the DEIR, the trip generation was based on the 2002 Fair attendance, the proposed changes in land use, and the growth potential that these changes could have. Appendix E of the TIA contains all of the trip generation tables, with each specific development itemized by its trip generation potential. As stated in the significance criteria, only conditions that are forecast to occur with repeated frequency will be mitigated. The peak weekend Fair Event day only occurs six times out of the year. As a result, any impacts identified in a peak-day analysis would not be mitigated. By analyzing the average attendance of the Fair, the analysis is elevating the historically lower weekday attendance and providing a more conservative analysis of a Fair Event, which occurs with greater frequency.
- L-1-103 Please see Response to Comment L-1-75. Furthermore, it is noted that the commentator acknowledges that the weekend traffic is higher than weekday traffic. The commentator has also "found" impacts at several intersections in the area, yet no evidence (i.e., ICU analyses) has been shared to reach this conclusion. The analysis presented in the EIR and TIA is based on a peak Fair Event condition reflecting the combined greatest volume of Saturday traffic and Fair Event traffic.
- L-1-104 During the 2002 Orange County Fair, concerts were held in the Arlington theater. The Arlington theater has the same capacity (8,500 seats) as the Pacific Amphitheater without seating on the berm, as is proposed in the Master Plan. Therefore similar concerts were in occurrence and were reflected in the traffic counts and trip generation. Trip generation for the concerts that may occur outside of a Fair Event have been accounted for in the daily trip generation shown in Table 4-12-G. The commentator acknowledges that "show times typically start after the p.m. peak period." Therefore, the peak-hour analysis does not include the contribution of concert traffic and is consistent with the overall analysis approach.
- L-1-105 Please see Responses to Comments L-1-67 to L-1-69 for a discussion of Fair Event parking supply and demand. As stated in the Traffic Impact Analysis, the daily patronage for a major Interim Event is expected to increase from 10,124 to 14,085 patrons. Using an average vehicle occupancy (AVO) of 2.5 persons per vehicle, an estimate negotiated with the City of Costa Mesa and rejected in the previous Master Plan analysis dated May 1996, approximately 4,050 parking spaces are currently required to meet the parking demand during an Interim Event. With the proposed Master Plan, approximately 5,634 parking spaces would be required. According to the Existing Parking and Master Plan Parking Estimates provided in Appendix A, approximately 9,200 parking spaces are currently available onsite during Interim Events. With the proposed Master Plan, approximately 8,900 parking spaces would be available onsite. Even with the possible reduction in available parking, the supply will be adequate to accommodate the demand of an Interim Event. In addition to onsite parking, several off-site parking areas are available during Interim Events. Orange Coast College, Costa Mesa High School, the AAA Lot, and Davis School are all

available to accommodate patron parking when Interim Event parking demand exceeds the on-site supply.

- L-1-106 A Parking Operations Manual has been developed for the OCFEC. This manual provides guidance for both Fair and Interim Events and provides a detailed discussion of parking lot operations to accommodate the parking demand.
- L-1-107 The land use changes and associated calculations for traffic generation increases are provided in Appendix E of the TIA. Appendix E provides the trip generation basis and methodology for Fair Events and interim events. As shown in Appendix E, the increase in trips associated with the interim event would result from increases in the Exhibit and Administrative buildings, Festival Grounds/Camping, and the Plazas/Courts. Fair trip generation increases are assumed to be a result of increases in the Exhibit and Administrative buildings, Carnival Lot, Barn, Silo, Arena, Plazas/Courts, and Centennial Farms.
- L-1-108 The purpose of this environmental disclosure is to understand the increase in vehicle trips attributable to the Fairgrounds Master Plan that include continued use of the area for weekend Marketplace and interim event functions and representative annual Fair Events. The traffic volumes included in the analysis were counted on the highest attended weekend of the 2002 Orange County Fair. Therefore, increases in the Fair Event condition are being added to a traffic baseline that is considerably higher than a typical Fair Event, thereby presenting a more conservative analysis.
- L-1-109 Please see Response to Comments L-1-57, L-1-67, and L-1-96. The 32nd DAA respectfully disagrees with the commentator's assertion that "increased attendance will occur by extending the Fair Event to 21 days." The length of the annual summer Fair was extended by four days (from 17 to 21 days) not to attract a greater daily attendance, but to specifically reduce daily attendance and facilitate OCFEC operations. Attendance at the annual summer Fair increased by about 3 percent annually between 1993 and 2002, and without the proposed Master Plan or extending the number of Fair days, attendance was expected to continue to increase. While it is acknowledged that the proposed Master Plan may further increase attendance levels, this is more directly tied to the project than to the extension of the Fair. As stated on page 4.12-17 in the DEIR, the attendance capacity of the OCFEC would be expanded by 37 percent for the annual Fair Event by implementation of the proposed project. The expanded capacity of the OCFEC would allow for any anticipated attendance increases that would occur regardless of project implementation.
- L-1-110 The average vehicle occupancy (AVO) of 2.5 was originally selected by the City of Costa Mesa Transportation staff and agreed to by the OCFEC staff for use in the Master Plan analysis. According to parking data provided in the traffic study prepared in 1996 for the previous Master Plan, an AVO of 3.5 to 4.5 persons per vehicle was observed. Similarly, the City of Anaheim considers an AVO of 3.5 to 4.5 for events such as baseball games at Anaheim Stadium, hockey at the Arrowhead Pond, or patrons at Disneyland. As a result,

both patrons and event support are accounted for in the extremely conservative estimate of 2.5 persons per vehicle for Fair attendees.

- L-1-111 The Existing Fair Event plus Master Plan and Cumulative Fair Event plus Master Plan scenarios were reanalyzed using a daily trip generation of 4,620 vehicles. The results are shown in the Errata. Figure 4.12.9 has been updated with the increased traffic volumes and is also provided. As shown in the Errata, the increased vehicle trip generation does not result in any significant impacts; therefore, the results of the analysis presented in the DEIR will not change as a result of this adjustment.
- L-1-112 Please refer to Responses to Comments L-1-41 and L-1-56.
- L-1-113 As stated previously in Response to Comment L-1-91, the peak hour of the Fairgrounds takes place during the afternoon hours, after the peak hour of ambient traffic. The traffic counts represent the peak hour of ambient traffic; therefore, peak-hour arrivals at the Fairgrounds are not represented in the existing traffic volumes.
- L-1-114 Please see Responses to Comments L-1-102, L-1-104, and L-1-109.
- L-1-115 As noted by the commentator, the Pow Wow started on Friday; however, the peak days used for analysis were Saturday and Sunday. When the City references a weekday, the City typically means Tuesday through Thursday (Friday omitted). Even if a weekday analysis were presented, Friday would not be included.
- L-1-116 Please see Response to Comment L-1-107.
- L-1-117 Please see Response to Comment L-1-110. The Existing Interim Event plus Master Plan and Cumulative Interim Event plus Master Plan scenarios were reanalyzed using a daily trip generation of 3,160 vehicles. The results are shown in the Errata. Figure 4.12.5 has been updated with the increased traffic volumes and is also provided. As shown in the Errata, the increased vehicle trip generation does not result in any significant impacts; therefore, the results of the analysis presented in the DEIR will not change as a result of this adjustment.
- L-1-118 Please see Response to Comment L-1-104. The Interim Event with Concert is analyzed as a separate event from the interim scenarios. However, as explained in the previous response, the peak hour of the concert event does not coincide with the peak hour of Saturday traffic during the study period. Daily concert trips on the study area roadways are fully disclosed in the DEIR.
- L-1-119 Please see Responses to Comments L-1-75 and L-1-78. Also refer to response that outlines mitigation measure on scheduling concerts.
- L-1-120 Please see Response to Comment L-1-78.

- L-1-121 Please see the response to the prior comment regarding analysis of the Pacific Amphitheater.
- L-1-122 As stated in the TIA, the project trip distribution patterns were developed based on the approved 1996 LSA traffic analysis that was the subject of the joint Fair Board/City of Costa Mesa Council hearing in summer 1996. This regional distribution pattern was applied to project traffic using the Traffix software program. Traffix allows individual paths to be drawn from locations where project traffic enters or exits the study area to and from the project. This software allows for greater refinement of the regional trip distribution at the local project level than what is possible using a manual method of trip distribution and assignment. This method also allows for greater accuracy in modeling project trips that may not follow the same inbound and outbound path (i.e. trips that arrive via southbound Newport Boulevard but depart via northbound Newport Boulevard). As a result, the trip assignment shown in Figure 4.12.5 includes both inbound and outbound trips. The 53 trips making a southbound right turn onto Fair Drive at Newport Boulevard include both traffic inbound to the site destined for an entrance on Fair Drive and traffic outbound from the site departing via the western terminus of Mesa Drive.
- L-1-123 Please see the responses to prior comments to page 4.12-18. Trip distribution and assignments at the entry gates can be determined using the existing and plus project traffic volume figures and the project trip generation provided in the DEIR and TIA.
- L-1-124 Please see Response to Comment L-1-86.
- L-1-125 Please see Responses to Comments L-1-83 and L-1-84.
- L-1-126/127  
Please see Response to Comment L-1-70 and L-1-72. The amphitheater will be used to host headline concerts during the Fair Event and other similar events during the remainder of the year. Most concerts will be scheduled on weekday and weekend evenings or during weekend afternoon hours. To minimize on-street impact and ensure Amphitheater events do not conflict with concurrent Interim Events, the project description has been amended to stipulate that amphitheater events may not be scheduled to begin earlier than 7:30 p.m. on a weekday or within one hour of the commencement or completion of a significant Interim Event (i.e., an event or combination of events with a forecasted attendance of 10,000 persons or more). These stipulations can be found on page 3-7 in the Errata in Volume VI of the FEIR.
- L-1-128 Please see Responses to Comments L-1-90 through L-1-94.
- L-1-129 The intersections of Newport South/Mesa Drive and Fairview Road/Arlington Drive and Arlington Drive east of Fairview Road have been included on Figure 4.12.8. This figure is provided in the Errata.
- L-1-130 Please see Responses to Comments L-1-83 and L-1-84.

- L-1-131 The intersections of Newport South/Mesa Drive and Fairview Road/Arlington Drive and Arlington Drive east of Fairview Road have been included on Figure 4.12.8. This figure is provided in the Errata.
- L-1-132 Please see Response to Comment L-1-99.
- L-1-133 Please see Responses to Comments L-1-83 and L-1-84.
- L-1-134 Although analysis shows that the study area intersections operate at LOS C or better during the Fair Event, the observations show that there were sporadic events of congestion that were a function of the traffic management plan. Please also see Response to Comment L-1-90. The significance criteria indicate which conditions would be mitigated; the Fair condition is not one of these conditions.
- L-1-135 The DEIR and TIA do state that in addition to Fair Events, there are significant interim events, including the Amphitheater. In fact, this was one of the analyzed scenarios.
- L-1-136 Capital improvement mitigation measures were not established as part of the prior Master Plan update because the last proposed Master Plan was not approved. An environmental document with mitigation measures was never fully certified nor was mitigation implemented. Any capital improvement measures that were agreed to by the Fairgrounds were done so as part of a negotiated settlement with the City and not as part of an EIR certification process. No traffic impacts requiring mitigation were identified in the current EIR; therefore, no mitigation measures are required. The project is a new Master Plan, not a revision to a prior plan.
- L-1-137 An analysis of the southbound Newport Boulevard entrance at Mesa Drive has been prepared and included in the Errata section.
- L-1-138 Off-site parking facilities serving various Fairground's events are identified in the Existing Parking and Master Plan Parking Estimates provided in Appendix A. Approximately 10,277 spaces are available during the Fair Event and 8,977 spaces are available during Interim Events. These spaces are located at Orange Coast College, Costa Mesa High School, Davis School, the AAA Lot, and the Experian Parking Structure. The Conditional Use Permit for parking at the Experian Parking Structure is valid for the annual Fair Event only. As a result, this parking area is not available during Interim Events.
- L-1-139 Please refer Responses to Comments L-1-67 through L-1-72.
- L-1-140 Please refer Responses to Comments L-1-67 through L-1-72.
- L-1-141 Please refer Responses to Comments L-1-67 through L-1-72.
- L-1-142 Please refer Responses to Comments L-1-67 through L-1-72.

- L-1-143 Please refer Responses to Comments L-1-75 and L-1-76.
- L-1-144 Please refer Response to Comment L-1-104.
- L-1-145 Please refer Response to Comment L-1-76.
- L-1-146 As stated on page 3-1 of the DEIR, "The OCFEC has existed at this location for over 50 years and has become a year-round exhibition, conference, and event center." Attendance figures over the past 10 years show a Fair attendance of over 600,000 per year, with an attendance of 900,000 in 2002. Over this same period, large interim events including the Orange County Marketplace have been held at the OCFEC during interim weekends. This has been disclosed not only in the current DEIR but also in the traffic study prepared in 1996 for the previously proposed Master Plan. During the OCP consistency process whereby cities review traffic model input data, the Fairgrounds operation was underway and a known activity to the City. The preparation of the City's traffic model is the responsibility of the City of Costa Mesa for the benefit of the City of Costa Mesa and not the explicit responsibility of any landowner in the City, including the Fairgrounds.
- L-1-147 Please refer Response to Comment L-1-136.
- L-1-148 Please refer Response to Comment L-1-136.
- L-1-149 Please refer Response to Comment L-1-136.
- L-1-150 Please refer Response to Comment L-1-136.
- L-1-151 OCFEC and the City have satisfied this recommendation by preparing and executing an agreement to reconstruct (City responsibility) and maintain (OCFEC responsibility) the landscaping and trail for the area between Newport Boulevard and the Fairground's eastern boundary between Arlington Drive and Fair Drive. Recently, the City submitted an additional request to the OCFEC to install a monument sign in this same area.
- L-1-152 The OCFEC will work collaboratively with the City to provide a closed circuit television (CCTV) camera at the Fairview Road/Fair Drive intersection providing input to the City Hall Transportation Operations Center and OCFEC to monitor peak-period traffic conditions. However, this recommendation will not be incorporated as a mitigation measure as part of this EIR, as this recommendation does not provide any degree of mitigation.
- L-1-153 Please refer to Response to Comment L-1-106.
- L-1-154 Consistent with Section 15130 of the CEQA Guidelines, all probable future projects at the time the NOP was circulated were included in the cumulative analysis. The project at 1901 Newport Plaza was included in the project analysis as reported by the City at the time the NOP was issued by the 32nd DAA. The commercial portion of the project was involved in the list of cumulative projects provided by the City. The 32nd DAA also directly contacted

the City of Costa Mesa for a list of projects to be considered in the Cumulative Impacts analysis. All projects contained on that list were represented in the DEIR.

L-1-155 Please refer to Response to Comment L-1-23.

L-1-156 This alternative is fully described and analyzed in DEIR Section 9.3.5. Relationships to other restaurants in the City of Costa Mesa are not germane to this analysis. Such a comparison would not benefit the analyses in the DEIR and is not required by CEQA.



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**County of Orange**  
*Planning & Development Services Department*

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NCL 03-035

May 2, 2003

Becky Bailey-Findley, CEO  
Orange County Fair and Exposition  
88 Fair Drive  
Costa Mesa, CA 92626

SUBJECT: DEIR for the Orange County Fair and Exposition Center Master Plan

Dear Ms. Bailey-Findley:

The above referenced item is a Draft Environmental Impact Report (DEIR) for the Orange County Fair and Exposition Center. The project site is located in central Costa Mesa, on the north side of Fair Drive, between Newport Boulevard (southbound) to the east and Fairview Drive to the west. The proposed project involves removing and replacing existing structures, constructing new additional structures, constructing additional parking areas, and establishing a coherent and thematic landscape, sign, and lighting plan. In general, the project will result in a core of facilities surrounded by a parking area.

L-2-1

The County of Orange has reviewed the DEIR and offers the following comments:

**WATER QUALITY**

1. We recommend the EIR ensure that the proposed commitments to installation and maintenance of site design, source control, and treatment control Best Management Practices (BMPs) in the Project Water Quality Management Plan (WQMP) are consistent with the Countywide Drainage Area Management Plan (DAMP) New Development Appendix.
2. Under the new Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) permit and in the pending 2003 DAMP, parking lot areas of 5,000 square feet or more, or with 15 or more parking spaces and potentially exposed to urban runoff, and commercial development greater than 100,000 square feet including parking areas will be considered priority projects which will require appropriately sized treatment control BMPs to be included in the WQMP.

L-2-2

L-2-3

OPEN SPACE/RECREATION

- 3. The County's Harbors, Beaches and Parks/Program Management Division is sending comments in a letter under separate cover that you will receive shortly. | L-2-4

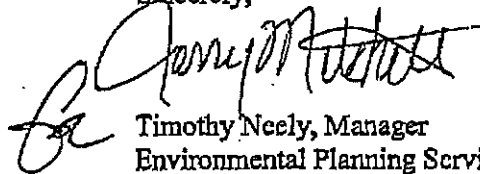
CULTURAL/HISTORICAL

- 4. Mitigations 4-1 and 4-2: These mitigations, which have been uniquely created rather than following suitable standard measures, would separate the collection from the data. They require donation of the collection to the County of Orange while requiring the report and catalogue to go to the Orange County Natural History Museum. The mitigations should be revised to require the research data, reports and all support documentation for the collection to be donated to the repository for the collection, which according to the mitigation would be the County of Orange. We are unaware of an existing institution named the Orange County Natural History Museum that has the facilities for warehousing and ongoing curation of cultural resource materials. Scientifically and according to standard museum and resource management practice, the artifacts and fossils should be maintained within the same facility. If the consultant wishes to produce and provide additional copies of the report to another institution that would be up to them. | L-2-5  
| L-2-6  
| L-2-7

- 4. We suggest that the 32<sup>nd</sup> District Agricultural Association follow the Board of Supervisors lead in requiring any collections removed from the site during development, be donated to an institution "within Orange County." The materials should be "prepared to the point of identification." The project proponent should "be prepared to pay potential curation fees." Addition of this language to the mitigations is necessary to prevent unprepared collections being deposited with the County or other institutions and without the funding for its care and curation. Updated standard conditions for the County of Orange address these issues and we suggest that the mitigation for this project follow the example of the Board of Supervisors in adopting these standard conditions for cultural resources. | L-2-8

Thank you for the opportunity to respond to the DEIR. If you have any questions, please contact Charlotte Harryman at (714) 834-2522. | L-2-9

Sincerely,



Timothy Neely, Manager  
Environmental Planning Services Division

ch

## COUNTY OF ORANGE; PLANNING AND DEVELOPMENT SERVICES/ENVIRONMENTAL PLANNING SERVICES

- L-2-1 The comment is introductory and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.
- L-2-2 Comment noted. Project implementation shall comply with all required BMPs in the WQMP and DAMP regulations in existence at the time of individual facility construction, as implemented by the City of Costa Mesa, consistent with Mitigation Measure 6-3. Please refer to Response to Comment L-1-43.
- L-2-3 Comment noted. Project implementation shall comply with all required BMPs, the WQMP, and DAMP regulations in existence at the time of individual facility construction, consistent with Mitigation Measure 6-3. Please refer to Responses to Comments L-1-43 and L-1-44.
- L-2-4 Comment noted. Comments were received from the County's Harbors, Beaches, and Parks/Program Management Division on May 5, 2003, and will be responded to as a separate comment letter.
- L-2-5 Comment noted. Mitigation Measures 4-1 and 4-2 found in the DEIR have been amended to require that follow-up reports and support documentation for all paleontological and archaeological resources are offered to the County of Orange, or its designee, on a first refusal basis along with any excavated finds.
- L-2-6 Please refer to Response to Comment L-2-5.
- L-2-7 Comment noted. No further response necessary.
- L-2-8 Comment noted. Mitigation Measures 4-1 and 4-2 found in the DEIR have been amended to require that any excavated finds are prepared to the point of identification and offered to the County of Orange, or its designee, on a first-refusal basis. The mitigation measures have been further amended to require that the 32nd DAA pay possible curation fees.
- L-2-9 The comment concludes the comment letter and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.

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**COUNTY OF ORANGE**  
**PUBLIC FACILITIES & RESOURCES DEPARTMENT**

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May 5, 2003

Becky Bailey-Findley, CEO  
Orange County Fair and Exposition Center  
88 Fair Drive  
Costa Mesa, CA 92626

Subject: Comments on the Orange County Fair and Exposition Center  
Draft Environmental Impact Report (DEIR)

Dear Ms. Bailey-Findley:

The County of Orange recently sent comments to you regarding the subject DEIR. However, Harbors, Beaches and Parks (a division of the County's Public Facilities and Resources Department) is sending its comments by this letter, as follows:

L-3-1

**LAND USE, RECREATION and TRANSPORTATION**

**Page 4.11-3**

1) First paragraph: At the end of the last sentence, add the following: "On-road and paved off-road bikeways are addressed in the Orange County Transportation Authority's Strategic Plan for regional bikeways".

L-3-2

2) Second paragraph: It is not entirely correct to say that Class I bikeways are "avoided by experienced cyclists". While it is true that there are experienced bicyclists who prefer the speed possible while traveling in traffic, there are also many experienced bicyclists who prefer being separated from traffic, and who enjoy such Class I routes as the Santa Ana River, Peters Canyon, and Aliso Creek Bikeways. We suggest stating, "Because these bikeways are off-road, they are popular with bicyclists and pedestrians with a wide range of ages and abilities" (or similar wording).

L-3-3

3) Fourth paragraph: The text reads "Per the MPRRHT and the Orange County Transportation Authority Bikeway Strategic Plan..." Delete the reference to the MPRRHT (this master plan applies only to unpaved trails).

L-3-4

4) Fourth paragraph: The text reads "The MPRRHT and other documents prepared by the Riding and Hiking Trails Advisory Committee..." Please note that the MPRRHT was not actually prepared by the Riding and Hiking Trails Advisory Committee. It is a County master plan that was prepared by staff and approved by the Board of

L-3-5

Supervisors. The Committee is a Board-appointed group of citizens who advise County staff regarding trail issues.

L-3-5

5) Fifth paragraph: The text reads "Though approved, the trail has not been extended westerly along the Delhi Channel due to lack of funding." This is incorrect. County's Harbors, Beaches and Parks Director had temporarily delayed all HBP projects during much of 2002, including expenditures for line-item accounts such as lumber, sand, and gravel. This was done until a priority could be established for projects and maintenance. The subject trail implementation along the Delhi Channel is being scheduled for construction in the near future.

L-3-6

It is highly unusual, and of concern, that DEIR preparers felt it was important to include such a statement, particularly without contacting the County for clarification. Use of the statement implies that funding somehow dictates whether master-planned goals are ever implemented. Numerous other statements in the same paragraph and the following two paragraphs are also misleading and appear to cast doubt on the future completion of the Santa Ana Heights Trail, in order to avoid addressing important public benefits to be provided by the project. We request therefore that all such references be removed.

L-3-7

The County relies in large part on the development entitlement process (and a variety of fee programs) to create and enhance facilities that provide public benefit to improve the lives of its citizens. In this case the Board of Supervisors adopted a County-wide system of inter-connecting trails reaching from the mountains to the sea. Construction of the County's trail system, because it is tied so closely to residential and commercial development, may appear to proceed slowly. However, since 1992 the County has implemented over 90 miles of trail and bikeway, more miles than the previous 25 years combined. We feel the project should meet its obligation to construct a small portion of the Santa Ana Heights Trail (one of the County's regional trails) and the regional trail staging area. Harbors, Beaches and Parks staff would be happy to meet with you to discuss County's program needs for this project.

L-3-8

Page 4.11-5

6) Second paragraph: The sentence reads, "However, it is outside of the direct responsibility of the OCFEC to pursue these off-site trail improvements". This may have been a misunderstanding. The County is not requesting that the project build off-site improvements---only those that are on-site. The County will require construction of:

L-3-9

- A regional trail staging area by the equestrian center.
- A portion of the Santa Ana Heights Trail from inside the east edge of the fairgrounds property (assumed to begin just back of public road right-of-way inside the perimeter fence) from the intersection of Newport Boulevard and Mesa Drive northward to the future trail staging facility. We suggest that the trail be

L-3-10

routed along the east edge of the Equestrian Center and the proposed Swap Meet area, within a landscaped setback with shade trees.

L-3-10

The County is already working with the Santa Ana Heights Project Advisory Committee (PAC) and the Orange County Flood Control District (OCFCD) to extend the trail from Upper Newport Bay Ecological Preserve to the intersection of Santa Ana Avenue and Mesa Drive, via the Santa Ana Delhi Channel and Santa Ana Avenue. The County will also work with the City of Costa Mesa to continue the trail along Mesa Drive, to the intersection of and Newport Boulevard.

L-3-11

7) Third paragraph: The text states, "...there are bikeways on all sides of the Fairgrounds..." However, this includes Class II bikeways, which are on-road. We ask that the project proponent continue the partially existing Class I bikeway around the entire perimeter of the project site, and include this in the proposed landscape design. (We ask that shade trees be interspersed with the proposed palm trees, to provide more shade for bicyclists and pedestrians).

L-3-12

L-3-13

As noted in the Land Use text, land use goals in the Costa Mesa General Plan include to "encourage new development and redevelopment to improve and maintain the quality of the environment", "respond to the needs of its citizens for...community facilities, and safety of persons..." and "ensure availability of adequate community facilities and provision of the highest level of public services possible...". Although we understand the project proponent is exempt from such land use policies, it would comply with the spirit of these goals to provide residents with a Class I bikeway segment that would 1) close another bikeway gap between Newport Boulevard and the Santa Ana River Bikeway, 2) provide an off-road route for bicyclists traveling to the various sections of the fair and exposition site, and 3) provide an off-road route for students and faculty of Orange Coast College, Costa Mesa High School, and Davis Intermediate School. A common complaint our office receives from the general public is the lack of off-road bikeways, since younger and less experienced bicyclists--and even many experienced bicyclists--prefer not to ride in traffic. The current existing bikeway along the east (and a portion of the south) side does not connect to the schools and college, and does not provide access to all sides of the Fair and Exposition site.

L-3-14

**Page 4.2-31**

8) Section 4.2.5 states, "There are no feasible mitigation measures to reduce vehicular trip related emissions". However, bikeways are mitigation measures to help reduce air pollution, traffic congestion, parking congestion, and noise. Class I bikeways in particular, because they are off-road and suitable for bicyclists and pedestrians with a wide range of ages and abilities, serve to encourage bicycling and walking as alternative modes of transportation and recreation.

L-3-15



**Page 4.12-31**

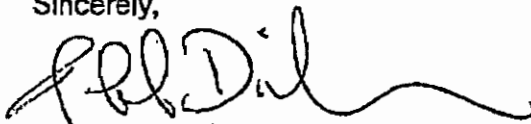
9) Regarding the Class I bikeway, delete "Per the Orange County Master Plan of Regional Riding and Hiking Trails (MPRRHT)". As noted above, only the OCTA plan applies to paved bikeways.

L-3-16

Thank you for the opportunity to review the subject DEIR. As noted above, HBP staff would be happy to meet with you to discuss our comments. If you have any questions, or to schedule a meeting, please feel free to contact me at (714) 834-5372.

L-3-17

Sincerely,



Jeff Dickman  
Chief, HBP/Trail Planning

cc: Santa Ana Heights Project Advisory Committee  
Regional Recreational Trails Advisory Committee

## COUNTY OF ORANGE; PFRD/HARBORS, BEACHES AND PARKS

- L-3-1 The comment is introductory and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.
- L-3-2 Comment noted. The sentence shall be added to the FEIR. It should be noted that the additional sentence is for clarification only. It does not affect the environmental analysis contained in the document.
- L-3-3 The text to which the comment refers is consistent with the classification of Bikeway types found in the Orange County Transportation Authority's Bikeway Strategic Plan, page 7. It should also be noted that paragraph 3 on page 4.11-3 states, "Class I bikeways in particular, because they are off-road and suitable for bicyclist and pedestrians with a wide range of ages and abilities, serve to encourage bicycling and walking as alternative modes of transportation and recreation." The text to which the comment refers is accurate as written and does not require revision. The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.
- L-3-4 Comment noted. The specific reference to the MPRRHT cited in the comment shall be deleted from the FEIR. The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.
- L-3-5 Comment noted. The sentence to which the comment refers shall be amended to read, "The MPRRHT and other county documents related to riding and hiking trails propose more direct trail linkages to the Fairgrounds." It should be noted that change is for clarification only. It does not affect the environmental analysis contained in the document.
- L-3-6 The statement to which the comment refers shall be amended to read, "Though approved, the trail has not been extended westerly along the Delhi Channel." It is understood that the trail has not been extended because the County Harbors, Beaches, and Park Director temporarily delayed all projects during much of 2002 in order to establish a priority list of projects and maintenance needs. It should be noted that the comment and clarification have no effect on the analyses in the DEIR.
- L-3-7 The commentator is mistaken in the assumption that the County was not contacted for clarification regarding trail implementation and construction. The EIR consultant met with County staff, Jeff Dickman, and Sherri Miller in the Harbors, Beaches, and Parks/Public Facilities and Resources Department on September 27, 2002. This meeting provided the source and context for the information contained in the DEIR.

It is not clear from the comment which other statements are of concern or how they are misleading. The development of the Santa Ana Heights Trail is analyzed only in as much as it relates to development of the proposed Master Plan. The statements contained in the EIR are a factual description of the improvements necessary to connect the Trail to the Fairgrounds. References to funding constraints are included to present an accurate representation of trail development challenges. Moreover, the DEIR does not avoid addressing the public benefits to be provided by the project. On page 4.11-8, the DEIR reads, "The OCFEC is a regional recreational facility; the proposed project expands its capacity to serve regional recreational needs." The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.

- L-3-8 The comment expresses an opinion that the project has an "obligation" to construct a portion of the Santa Ana Heights Trail. This assertion is not tied to any environmental analysis nor is there a clear nexus between the requested action and the environmental impacts of the proposed project. As stated in the DEIR on page 4.11-9, the proposed project will not disrupt existing regional trails or preclude development of future trails, including the Santa Ana Heights Trail. Therefore, there is no environmental impact regarding existing or planned trails. It is not evident from the comment how the OCFEC or 32nd DAA has an obligation to construct these facilities. Because there is no additional analysis provided in the comment, no further response is necessary.
- L-3-9 The County is not a permitting authority or a Responsible Agency for this project and has no development authority over the OCFEC. The 32nd DAA has planning and development authority over the OCFEC. The requirement mentioned in the comment is not tied to any environmental analysis, nor is there a clear nexus between the requested action and the environmental impacts of the proposed project. As stated in the DEIR on page 4.11-9, implementation of the proposed project does not preclude future development of a staging area by the equestrian center; however, its construction is not included in the proposed project and is not warranted as project impact mitigation within the context of this EIR process.
- L-3-10 Please see Response to Comments L-3-8 and L-3-9. The requirement mentioned in the comment is not tied to any environmental analysis, nor is there a clear nexus between the requested action and the environmental impacts of the proposed project. As stated in the DEIR on page 4.11-9, implementation of the proposed project does not preclude future development of a Trail; however, its construction is not required as project impact mitigation within the context of this EIR process. The comment will be forwarded to the decision makers for their consideration.
- L-3-11 Comment noted. The 32nd DAA supports and commends the County of Orange, the Santa Ana Heights Project Advisory Committee (PAC), and the City of Costa Mesa in their ongoing effort to extend the Santa Ana Heights Trail from Upper Newport Bay to the intersection of Mesa Drive and Newport Boulevard. Project implementation will not disrupt or preclude development of future trails in the vicinity of the project site. This comment

does not provide any substantive statements or questions about the DEIR or the environmental analysis contained therein. Therefore, no further response is necessary.

- L-3-12 Please see Response to Comments L-3-8, L-3-9, and L-3-10. The extension of the Class I bikeway around the entire perimeter of the project site is not a part of the project, nor it is warranted as mitigation for project impacts. Because there is no additional analysis provided in the comment, no further response is necessary. The comment will be forwarded to the decision makers for their consideration.
- L-3-13 The 32nd DAA will review the location of shade trees/canopy trees and types of plant materials. The comment is not related to discussion of environmental effects and appears to provide County preferences for planting materials. The comments will be forwarded to the decision makers for their consideration.
- L-3-14 Please see Response to Comments L-3-8, L-3-9, L-3-10, and L-3-12. As stated in the comment, the project proponent is exempt from local land use polices. The 32nd DAA will work cooperatively with the City of Costa Mesa to implement the proposed project; however, construction of a Class I bikeway on the north and west sides of the Fairgrounds is not warranted as project impact mitigation.
- L-3-15 Access to the Fair and other events at the site is of limited feasibility for Fairgrounds patrons, usually families with small children who are visiting the site from all over Southern California. Bikeways would have limited effectiveness in reducing vehicular trips to and from the Fairgrounds.
- L-3-16 Comment noted. The specific reference to the MPRRHT cited in the comment shall be deleted from the FEIR.
- L-3-17 The comment concludes the comment letter and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.

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BOARD OF LEGAL SPECIALIZATION

LAURALI M. KOBAL  
OFFICE ADMINISTRATOR

May 1, 2003

OUR FILE NUMBER:  
2305-02

VIA FACSIMILE ONLY

Ms. Becky Bailey-Findley, General Manager  
Orange County Fair & Exposition Center  
88 Fair Drive  
Costa Mesa, CA 92626-6598

Re: Orange County Marketplace Merchants Association  
Subject: Request for Extension of Time to Respond to Environmental  
Impact Report

Dear Ms. Findley:

As you may know, we represent the interests of the Orange County Marketplace Merchant's Association ("OCMMA"). The OCMMA has recently become aware that the Orange County Fair Board has issued an Environmental Impact Report regarding the Fair Board's "Master Plan." Further, we are advised that responses and public commentary are due to be submitted no later than tomorrow, May 2, 2003.

O-1-1

Please consider this correspondence a request by the OCMMA for an extension of time to respond or submit commentary regarding the Fair Board's Environmental Impact Report. OCMMA would like to take a careful look at the Environmental Impact Report itself and submit substantive commentary to the Fair Board. We believe that it would be beneficial to everyone's interests if OCMMA were permitted to submit public comment on the Environmental Impact Report.

O-1-2

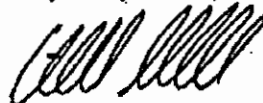
**CALLAHAN & BLAINE**

Ms. Becky Bailey-Findley, General Manager  
Orange County Fair & Exposition Center  
May 1, 2003  
Page 2

Accordingly, OCMMA respectfully requests an additional 21 days, until May 22, 2003, to submit comments or responses to the Environmental Impact Report. | O-1-2

Please advise at your earliest opportunity whether OCMMA's request for extension has been granted. Please call me if you have any questions. | O-1-3

Very Truly Yours,



Edward Susolik

ES:vl

cc: Tom Askew  
Daniel J. Callahan, Esq.  
Steve A. Schneider, Esq.

**Orange County Fair & Exposition Center**

32nd District Agricultural Association

88 Fair Drive

Costa Mesa, California 92626-6598

(714) 708-3247 - Voice

(714) 641-1783 - Fax

May 2, 2003

VIA FACSIMILE

Mr. Edward Susolik  
Callahan & Blaine  
3 Hutton Centre Drive  
Suite 900  
Santa Ana, CA 92707

RE: Orange County Marketplace Merchants Association Request for Extension of Time to Respond to Draft Environmental Impact Report.

Dear Mr. Susolik;

This letter is in response to your May 1, 2003 letter requesting an extension of the May 2<sup>nd</sup> deadline for public comments to the District's Draft Environmental Impact Report.

The official review period for District's Draft Environmental Impact Report started on March 19, 2003 and ends today, May 2, 2003. There is no way to administratively extend the response time. Further, there is no way to call the District Board of Directors together for them to take action on extending the deadline.

The District took extraordinary efforts to make sure stakeholders, such as your client OCMMA, were informed of the Draft EIR and review period. Mr. Askew, President of OCMMA, was sent a letter on or about March 14, 2003 that alerted him to the release of the Draft EIR and the public comment deadlines. The comment period was also noted on the District's website and was discussed or mentioned in public meetings in March and April.

Therefore, it is not possible to grant your request for an extension.

Sincerely,  
ORANGE COUNTY FAIR &  
EXPOSITION CENTER

Becky Bailey-Findley  
CEO

Cc: Tom Askew  
Frank Haselton, LSA  
Jerry Blair, DOJ



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## CALLAHAN AND BLAINE

- O-1-1 The official review period for the DIR started on March 19, 2003, and ended on May 2, 2002. The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.
- O-1-2 The comment requests that the public review period be extended by 21 days. The comment was responded to in writing by Becky Bailey-Findley, CEO, Orange County Fair and Exposition Center, on May 2, 2003. The text of her letter is included below, and a copy of the letter is attached to the comment letter from Callahan and Blaine.

*This letter is in response to your May 1, 2003 letter requesting an extension of the May 2<sup>nd</sup> deadline for public comments to the District's Draft Environmental Impact Report.*

*The official review period for District's Draft Environmental Impact Report started on March 19, 2003 and ends today, May 2, 2003. There is no way to administratively extend the response time. Further, there is no way to call the District Board of Directors together for them to take action on extending the deadline.*

*The District took extraordinary efforts to make sure stakeholders, such as your client OCMMA, were informed of the Draft EIR and review period. Mr. Askew, President of OCMMA, was sent a letter on or about March 14, 2003 that alerted him to the release of the Draft EIR and the public comment deadlines. The comment period was also noted on the District's website and was discussed or mentioned in public meeting in March and April.*

*Therefore, it is not possible to grant your request for an extension.*

- O-1-3 Please see Response to Comment O-1-2. This comment concludes the comment letter and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.

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May 1, 2003

Becky Bailey-Findley, General Manager  
 Orange County Fair and Exposition Center  
 32<sup>nd</sup> District Agricultural Association  
 88 Fair Drive  
 Costa Mesa, CA 92626

Dear Ms. Bailey-Findley,

Thank you for allowing the Costa Mesa community and your neighbors the opportunity to review and learn more about the Orange County Fairgrounds and Exposition Center's Master-Plan project. As a longtime neighbor, we certainly appreciate this gesture.

O-2-1

Until now, we were largely unaware of the current plan's scope and far reaching potential impacts. With this in mind, we would welcome the chance to more thoroughly study the Master-Plan with members of the Vanguard University staff, so that we might be better prepared to raise any questions or concerns that may arise from a more comprehensive evaluation. Thank you in advance for allowing us this additional time for review.

O-2-2

Sincerely,

Murray W. Dempster  
 President

MWD:pt

Cc: Ruben Smith, President, Orange County Fair Board

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## VANGUARD UNIVERSITY

- O-2-1 The comment is introductory and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.
- O-2-2 The commentator is mistaken in his assumption that Vanguard University was not informed of the scope of the master plan prior to the release of the DEIR. The OCFEC consultant met with Vanguard University officials on February 16, 2001, (project introduction) and on February 19, 2002 (site plan review). Vanguard University officials also attended at least one public meeting on the Fairgrounds.

As stated in Response to Comment O-1-1, the official review period for the DEIR started on March 19, 2003, and ended May 2, 2003. There was no way to administratively extend the response time, nor was there a mechanism for expeditiously calling the 32nd DAA Board of Directors together for them to take action on extending the deadline.

In addition to the Notice of Availability published in several area newspapers, the 32nd DAA directly notified Vanguard University by letter of the availability of the DEIR and review period on or about March 14, 2003. The comment period was also noted on the District's Web site and was discussed or mentioned in public meetings in March and April.

It is the opinion of the 32nd DAA that all legally required noticing occurred associated with the circulation of the DEIR and that the review period of the DEIR was consistent with CEQA requirements. Therefore, the review and comment period for the DEIR was not extended.

However, in light of this position, the 32nd remains committed to working with its neighbors, particularly Vanguard University. The 32nd is aware that Vanguard University is conducting an impressive Master Plan process, including imminent construction stages. The 32nd extends its willingness in sharing data and ideas regarding future changes tentatively scheduled for both properties.

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Margaret H. Nellor  
2955 Maui Place  
Costa Mesa, CA 92626

April 30, 2003

Ms. Becky Bailey-Findley  
CEO, Orange County Fair and Exposition Center  
88 Fair Drive  
Costa Mesa, CA 92626-6598

**Subject: Comments on the Draft EIR for the Proposed Orange County Fair and Exposition Center (OCFEC) Master Plan**

Thank you for the opportunity to provide comments on the Draft EIR. As a general comment, I believe that the proposed Master Plan and the preferred alternative do not fulfill the stated objectives of the overall project; namely, to facilitate a diverse range of uses and events, particularly of educational and recreational uses. This conclusion is based on the elimination of over 50% of the existing Equestrian Center to be turned into a concrete parking lot, with no plans to provide for community equestrian and educational activities, as promised in September 2002, nor plans to provide for added equestrian facilities elsewhere in the County.

I specifically refer to your letter dated September 9, 2002, asking for feedback on two suggested plans for the reconfiguration of the Equestrian Center, and subsequent meetings between Fair Grounds Management, the Ad Hoc Task Force (you formed) and Equestrian Center boarders. At that time, you specifically asked for and received suggestions on other alternatives. A number of alternatives were submitted that would have fulfilled the objectives of the Master Plan and the viability of the Equestrian Center for all of Orange County, which is slowly losing available space for equestrian activities as noted in letters from the Local 4-H Club that relocated to our facility.<sup>1</sup> The issue of limited equestrian facilities was also identified as a potential area of controversy in the Draft EIR (See pg. 1-3), but was not adequately addressed in the Draft EIR/Master Plan.

None of the aforementioned suggested alternatives were evaluated as part of the Draft EIR, but clearly should have been assessed. This included a recommendation that the demarcation line for making changes to the facility start at the Equestrian Center Office, thereby saving the existing office and bathrooms, the Balboa ring, the lunging facility, and the maintenance, feed storage and manure facilities.<sup>2</sup> Moving all of these facilities is a significant cost item that the Board of Directors should carefully consider when adopting the Master Plan, as well as the concomitant environmental impacts.

<sup>1</sup> Since the September 9, 2002 letter, the 4-H Club letters, and other documents pertaining to the Task Force and boarder meetings are public documents maintained as part of the OCFEC records, they are hereby incorporated by reference as part of the record for the Draft EIR.

<sup>2</sup> Please refer to my letter dated September 16, 2002 addressed to EC OCFR&EC 32<sup>nd</sup> DAA, 88 Fair Drive, Costa Mesa, CA 92626-6598, regarding "Reconfiguration of the Equestrian Center," which is hereby incorporated by reference.



I was also notified that the Draft EIR would be maintained in the Equestrian Center Office for public review. However, only Volume I out of a set of five volumes was available at the Equestrian Center Office, and therefore the OCFEC did not provide adequate opportunity for the public to review the document and provide comments. Consequently, I recommend that the comment period be extended and the complete Draft EIR be made available at the Equestrian Center Office for review. I-1-8

As documented in the Draft EIR, the proposed project will reduce the Equestrian Center from 11.5 acres to about 7 acres. The land that is eliminated from the Equestrian Center is to be paved with concrete and used for parking. The document fails to identify what if any other uses the new parking lot will be made of; consequently, if other uses are planned, the environmental impacts of such uses were not discussed, which is a deficiency in the Draft EIR. I-1-9

One of the objectives of the Master Plan is to "4. Develop and implement a Master Plan that will allow the Fairgrounds to serve the diverse ethnic and cultural populations of Orange County." See pg. 3-13 The Draft EIR/Mater Plan fails to adequately address how the loss of equestrian facilities in Orange County (e.g., taking away 50% of the existing facilities at the OCFEC) satisfies this objective, particularly given the limited and declining equestrian facilities in the County. This is a deficiency in the EIR that must be adequately addressed. I-1-10

The Draft EIR states that the Proposed Project does not substantially affect or reduce existing recreational facilities to a service level below what is needed to meet current demand. The Draft EIR/Master Plan does not clearly define what is meant by "current demand," which is a deficiency that must be addressed. In addition, the Draft EIR states that "Reducing the size of the EQC also does not reduce the range of activities occurring at this facility (Criterion 11-B)." See pg. 4.11-9 The Draft EIR/Master Plan does not clearly define what is meant by "range of activities," which is a deficiency that must be addressed. Also, the Draft EIR states that the "Project phasing will not create any short- or long-term impacts for recreation, and will not trigger the need for mitigation." See pg. 4.11-10 Unfortunately, the Draft EIR/Master Plan provides no explanation as to why project phasing has no impacts, which is a deficiency that must be addressed. I-1-11  
I-1-12  
I-1-13

The Draft EIR notes that Alternative A – No Project has similar air quality impacts to the Proposed Project. This conclusion is inherently wrong since the overall goal of the Proposed Project, including adding over 5 acres of parking, means bringing in more cars. The Draft EIR also notes when comparing Alternative A to the Proposed Project, that in terms of recreation, the Proposed Project will not differ from the existing use since the proposed project will "[c]ontinue with the same degree of programming, however, with a slight increase in covered square footage and open space." See pg. 9-7. This explanation is not clear and is absurd since the Proposed Project eliminates significant acreage of equestrian recreation. This deficiency must be addressed in the EIR. I-1-14  
I-1-15

The Draft EIR fails to consider other potential mitigation measures for air quality impacts that perhaps could save the existing size of the Equestrian Center, yet provide for parking when needed for OCFEC events. It is my observation that on most weekends, the parking lot next to the Equestrian Center is not full. That of course is not the case for holiday weekends or very large events. On those occasions, the Master Plan should consider not adding paved parking, but using existing remote parking and transporting event participants using clean fuel vehicles. I-1-16

Thank you again for the opportunity to provide comments on the Draft EIR. I hope that you will seriously consider other alternatives to significantly reducing the size of the Equestrian Center. These alternatives would certainly be in the best interest of preserving recreational opportunities for the County, and hence the objectives of your Master Plan. They may also have less significant environmental impacts than the Proposed Project, and therefore should be assessed. If you have any questions or need additional information, please contact me at 714-241-8767.

I-1-17

Sincerely,



Margaret H. Nellor

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## MARGARET NELLOR

- I-1-1 Comment noted. The comment is an opinion that the proposed Master Plan does not fulfill the stated objectives of the project. The 32nd DAA respectfully disagrees with this opinion. The whole of the proposed project was considered during the environmental review process and was found to be consistent with the stated project objectives. Because there are no facts or analysis provided in the comment, no further response is necessary.
- I-1-2 As stated in the DEIR on page 4.11-8, "The OCFEC is a regional recreational facility [and] the proposed project expands its capacity to serve regional recreational needs." The proposed project is not displacing any of the horses currently boarded at the facility or reducing the range of facilities available to boarders. Please note that although the total square footage of the Equestrian Center will be reduced with project implementation, equestrian activities will continue to take place on the project site. The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.
- I-1-3 The comment exhibits confusion between the purpose of a Master Plan and the various Equestrian Center layout plans that have been discussed at Buildings and Grounds Committee meetings. The layout plans were not alternatives to the proposed Master Plan; rather, they were refinements of the equestrian portion of the conceptual Master Plan presented and analyzed in the DEIR. The layout plans suggested by the Ad Hoc Equestrian Task Force focused on the arrangement of riding rings within the parameters of the proposed Master Plan 7.5-acre Equestrian Center. These plans reflect a detailed refinement of the equestrian center and do not affect the environmental analysis contained in the document.
- I-1-4 The DEIR addresses the impacts of the proposed project on recreation activities, including equestrian activities, in chapter 4-11. The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.
- I-1-5 CEQA Guidelines (§ 15126.6) require that an "EIR describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project." Therefore every suggestion related to the proposed Master Plan discussed at various public meetings need not be evaluated in the DEIR, as long as a reasonable range of alternatives were included as part of the analysis.

I-1-6 Please see Response to Comment I-1-3. The suggestions made by the Ad Hoc Equestrian Committee to the Buildings and Grounds Committee are refinements of the conceptual Master Plan as evaluated and analyzed in the DEIR. These refinements may or may not be included as part of the Master Plan should it be adopted. They do not affect the environmental analysis contained in the document.

I-1-7 Comment noted. Section 15131(a) states that:

“Economic (cost) or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The immediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.”

Costs related to the implementation of the proposed project are not germane to the subject environmental analysis. No further response to comments regarding costs are warranted. This comment represents the opinion of the commentator on matters not specific to the environmental information and analysis in the DEIR. The opinion will be taken into consideration by the decision makers as part of their determination regarding the proposed project.

I-1-8 Pursuant to CEQA Guidelines, the Notice of Availability for the DEIR stated that the DEIR would be available for public review at the Orange County Fair and Exposition Center Administration Building, Mesa Verde Branch Library, and Costa Mesa Branch Library, and provided an address for each location. Volumes I through V were available for public review at each of those locations for the entire 45-day review period. Copies of each volume of the DEIR were also available for purchase, and a contact name was provided for questions related to obtaining a copy of the document. Volume I of the DEIR was provided to the Equestrian Center office as a courtesy. The Equestrian Center office was not, however, a designated public reviewing location for the DEIR. The 32nd DAA provided proper public notice of the availability of the DEIR and the locations at which the DEIR could be reviewed, pursuant to CEQA Guidelines Section 15087. Therefore the 32nd DAA respectfully rejects the commentator's request that the review and comment period be extended because the Equestrian Center office received Volume I of the DEIR and not the technical appendices (Volumes II through V).

I-1-9 It is expected that parking will be the primary use of the land next to the reduced Equestrian Center. There are no programmatic changes included in the Master Plan that delineate additional planned uses for this area.

I-1-10 It is unclear from the comment how a reduction in the square footage of the Equestrian Center represents a failure on the part of the 32nd DAA to serve the diverse ethnic and

cultural populations of Orange County. Equestrian Center users do not appear to qualify as a unique ethnic or cultural population.

- I-1-11 As stated in the EIR on page 4.11-7, the maximum long-term boarding capacity at the Equestrian Center is presently 168 horses. There are currently 101 horses boarded at the facility, leaving 40 percent of the stalls vacant. The proposed project will not displace any of the horses currently boarded at the facility. It should also be noted that approximately 40 stalls will remain available for additional horses. Likewise, the proposed project will not eliminate any of the types of facilities (refer to Table 4.11.B) available for boarding and training purposes, thus reasonably leading to the conclusion that the range of equestrian activities occurring at this site will continue after Master Plan implementation. Moreover, the DEIR analyzed the impacts of the proposed Master Plan on the full range of recreation activities occurring on the project site; the analysis was not limited to equestrian recreation activities. The analysis concluded that expanded open space and exhibit areas and condensed office space would allow the OCFEC to expand its ability to serve regional recreation needs. As such, the proposed Master Plan does not have a substantially adverse impact on existing recreation opportunities or facilities.
- I-1-12 Please refer to Response to Comment I-1-11. The proposed project will not eliminate any of the types of facilities (refer to Table 4.11.B) available for boarding and training purposes, thus reasonably leading to the conclusion that the range of equestrian activities occurring at this site, inasmuch as activities are tied to available facilities, will continue after Master Plan implementation.
- I-1-13 Phasing of the proposed project will not create any short- or long-term impacts related to recreation because the project site will continue to function as a regional recreation facility during each phase of project implementation.
- I-1-14 Page 9-2 of the DEIR states that the No Project/No Build Alternative is Alternative 1, which is the existing condition of the project site at the time the NOP was published. Alternative 2 is Design Alternative A, which has a similar program to the proposed project with a different arrangement of on-site buildings. As indicated on pages 9-5 and 9-10, both of these project alternatives would have long-term air quality impacts similar to the proposed project, with the No Project/No Build Alternative (Alternative 1) having potentially higher emissions because the Amphitheater could accommodate a greater number of patrons than what is called for in the proposed project.
- I-1-15 Page 9-2 of the DEIR states that the No Project/No Build Alternative is Alternative 1, which is the existing condition of the project site at the time the NOP was published. Alternative 2 is Design Alternative A, which has a similar program to the proposed project with a different arrangement of on-site buildings. As stated in the EIR on page 4.11-7, the maximum long-term boarding capacity at the Equestrian Center is presently 168 horses. There are currently 101 horses boarded at the facility, leaving 40 percent of the stalls vacant. The proposed project will not displace any of the horses currently boarded at the facility. It should also be noted that approximately 40 stalls will remain available for

additional horses. Likewise, the proposed project will not eliminate any of the types of facilities (refer to Table 4.11.B) available for boarding and training purposes, thus reasonably leading to the conclusion that the range of equestrian activities occurring at this site, inasmuch as activities are tied to available facilities, will continue after Master Plan implementation. Because the proposed Master Plan and Design Alternative A do not alter the intensity of programming at the Equestrian Center from the existing conditions, it is reasonable to conclude that there would be no significant adverse environmental impact related to recreation for the proposed project, the No Project - No Build Alternative, or Design Alternative A.

- I-1-16 Utilizing clean fuel vehicles to transport people between the Fairgrounds and remote parking lots for OCFEC events would help reduce vehicle exhausts between the Fairgrounds and the remote parking lots. However, the effect on emissions associated with vehicle trips to and from the Fairgrounds would be minimal. In addition, if clean fuel vehicles are not utilized, using the remote parking lots for OCFEC events may result in a slight increase in vehicle emissions due to the need to transport people with diesel-fueled buses.
- I-1-17 Comment noted. The opinion of the author will be forwarded to the decision makers for their review prior to taking action on the EIR and Master Plan. It should be noted that the DEIR presented and analyzed a reasonable range of alternatives as required by CEQA Guidelines Section 15126.6. The No Project - No Build Alternative was found to be the environmentally superior alternative despite several environmental advantages of the proposed project (e.g., improvements to stormwater and drainage systems), because it did not have any significant unavoidable adverse impacts.

Lorraine Tatham  
824 W 15<sup>th</sup> St #24  
Newport Beach, CA 92663

May 1, 2003

Ms. Becky Bailey-Findley  
CEO, Orange County Fair and Exposition Center  
88 Fair Drive  
Costa Mesa, CA 92626-6598

**Subject: Comments on the Draft EIR for the Proposed Orange County Fair and Exposition Center Master Plan.**

Thank you for considering comments on the Draft EIR for the 10-year master plan for the Orange County Fairgrounds.

I-2-1

As boarders at the Orange County Fair Equestrian Center, we were notified that the Draft EIR would be available for review in the Equestrian Center office. In actuality, only volume 1 of a set of 5 was available in the Equestrian Center office. This did not provide a proper opportunity for review of the complete document. I am requesting that the review and comment period be extended and the complete Draft EIR be available in the Equestrian Center office.

I-2-2

The Draft EIR document does not contain any of the suggestions made at the Board of Directors meetings or the Buildings and Grounds Committee meetings over the last year. The Orange County Fair and Exposition Center is obligated under CEQA to look at all reasonable and feasible alternatives. I don't feel this was adequately done. I recall that at a Buildings and Grounds Committee meeting, consideration was being given to the Equestrian Center office, feed storage and clean and fouled bedding storage being preserved as it would cost a substantial amount of money and there is very limited space available in the proposed 7 acre plan. The Draft EIR/Master Plan does not discuss preserving the existing buildings, nor, does it propose demolishing and rebuilding them elsewhere. This needs to be addressed as it will affect the environmental impact of the project.

I-2-3

I-2-4

The Board of Directors has repeatedly and strongly asked for more community service to be a part of the Equestrian Center. To that goal, the 4-H project was approved, then the "Ranch Project" was started up. Both community services are set up on the portion of the Equestrian Center that appears in the proposed Master Plan to be a parking lot. If these activities are to remain at the Fairgrounds, as they should, the impact of their relocation was not addressed in the Draft EIR.

I-2-5



The Draft EIR states that reducing the existing size of the Equestrian Center does not reduce the range of activities occurring at this facility (criterion 11-B). The Draft/Master Plan does not clearly define this "range of activities" and should be clarified. Also, if as mentioned above, the "Ranch Project" and the 4-H Project are moved into the proposed 7 acre Equestrian Center site, it would obviously impact the current uses at the Equestrian Center because the existing stabling and exercise room is greatly decreased. This impact should also be addressed in the Draft EIR.

I-2-6

I-2-7

The Draft/Master Plan states that the Alternative A – No Project has similar air quality impacts to the Proposed Project. This conclusion cannot be correct because the goal of the Proposed Project increases the amount of parking space by 5 acres. With the increased parking comes more cars and of course the air quality would be affected. Also, in comparing Alternative A with the Proposed Project the Draft EIR states that in the terms of recreation, the Proposed Project will not differ from the existing uses since this project will contain the same degree of programming, except for a slight increase in covered square footage and open space. This explanation needs to be better outlined as it makes no sense because the Proposed Project eliminates a large portion of utilized equestrian recreation area. This discrepancy should be addressed in the Draft EIR.

I-2-8

I-2-9

Once again I would like to thank you for consideration of these comments. In revisiting the Master Plan, I am hoping that an alternative to reducing the existing Equestrian Center be better examined. The Orange County Fair and Exposition Center states that its objective is to provide education, entertainment and recreation opportunities for the general public and preserve the heritage of California agriculture. It is difficult to see how these objectives will be better served by reducing the existing recreational acreage and replacing it with a parking lot. If you have any questions or concerns in relation to these comments, please contact me at 714-708-1648.

I-2-10

I-2-11

Sincerely,



Lorraine Tatham  
Evergreen Equestrian

## LORRAINE TATHAM

- I-2-1 The comment is introductory and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.
- I-2-2 Pursuant to CEQA Guidelines, the Notice of Availability for the DEIR stated that the DEIR would be available for public review at the Orange County Fair and Exposition Center Administration Building, Mesa Verde Branch Library, and Costa Mesa Branch Library and provided an address for each location. Volumes I through V were available for public review at each of those locations for the entire 45-day review period. Copies of each volume of the DEIR were also available for purchase, and a contact name was provided for questions related to obtaining a copy of the document. Volume I of the DEIR was provided to the Equestrian Center office as a courtesy. The Equestrian Center office was not, however, a designated public reviewing location for the DEIR. The 32nd DAA provided proper public notice of the availability of the DEIR and the locations at which the DEIR could be reviewed, pursuant to CEQA Guidelines Section 15087. Therefore, the review and comment period will not be extended.
- I-2-3 CEQA Guidelines (§ 15126.6) require that an “EIR describe *a range* of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project.” Therefore every suggestion related to the proposed Master Plan discussed at various public meetings over the last year need not be evaluated in the DEIR.
- I-2-4 The DEIR addresses the environmental impacts of the proposed Master Plan as described in the Project Description and graphically represented in Figure 3.2.1: Conceptual Site Plan. This includes reduction of the Equestrian Center from approximately 11.5 acres to approximately 7.5 acres. The Master Plan will be implemented in phases on a project-by-project basis. At that time, actual and eventual disposition of structures will be determined. The Master Plan (the proposed project, for the purposes of CEQA) provides the appropriate parameters for the requisite environmental analysis. Considering preservation of these structures does not change or amend the project as proposed and analyzed in the DEIR.
- I-2-5 As stated in Response to Comment I-2-4, the DEIR addresses the environmental impacts of the proposed Master Plan as described in the Project Description and graphically represented in Figure 3.2.1: Conceptual Site Plan. Pursuant to CEQA Guidelines Section 15126.6, the DEIR limited analysis to changes in existing physical conditions caused by the proposed project. The 4-H program is not part of the proposed Master Plan nor did it require any changes to the physical environment as it is accommodated in existing

Equestrian Center facilities. Likewise, the "Ranch Project" referenced in the comment is a programmatic addition to the Fairgrounds that is not directly tied to the proposed Master Plan. The Ranch Project may be temporarily located in an area shown on the Master Plan to be used as parking until Master Plan implementation. It can be assumed that with implementation of the proposed project, the program may be relocated to another area of the OCFEC including the expanded Centennial Farm area.

- I-2-6 As stated in the EIR on page 4.11-7, the maximum long term boarding capacity at the Equestrian Center is presently 168 horses. There are currently 101 horses boarded at the facility leaving 40 percent of the stalls vacant. The proposed project will not displace any of the horses currently boarded at the facility. It should also be noted that approximately 40 stalls will remain for additional horses. Likewise, the proposed project will not eliminate any of the types of facilities (refer to Table 4.11.B) available for boarding and training purposes, thus reasonably leading to the conclusion that the range of equestrian activities occurring at this site will continue after Master Plan implementation.
- I-2-7 As stated in Response to Comment 1-2-6, the proposed project will not eliminate any of the types of facilities (refer to Table 4.11.B) available for boarding and training purposes, thus reasonably leading to the conclusion that the range of equestrian activities occurring at the Center, even if the total acreage of the Center is reduced, will continue after Master Plan implementation. Likewise, the reduction in stalls available for long term boarding from 168 to 140 will not displace any horses currently boarded at the Equestrian Center. How, and by whom, the empty stalls are filled is not an environmental impact of the proposed project and does not need to be addressed in the EIR.
- I-2-8 Page 9-2 of the DEIR states that the No Project/No Build Alternative is Alternative 1, which is the existing condition of the project site at the time the NOP was published. Alternative 2 is Design Alternative A, which has a similar program to the proposed project with a different arrangement of on-site buildings. As indicated on pages 9-5 and 9-10, both of these project alternatives would have long-term air quality impacts similar to the proposed project, with the No Project/No Build Alternative (Alternative 1) having potentially higher emissions because the Amphitheater could accommodate a greater number of patrons than what is called for in the proposed project.
- I-2-9 Please refer to Response to Comment I-2-8. As stated in Response to Comment I-2-6, the proposed project will not eliminate any of the types of facilities (refer to Table 4.11.B) available for boarding and training purposes, thus reasonably leading to the conclusion that the range of equestrian activities occurring at the Center, even if the total acreage of the Center is reduced, will continue after Master Plan implementation. Likewise, the reduction in stalls available for long-term boarding from 168 to 140 will not displace any horses currently boarded at the Equestrian Center. Based on this information it also reasonable to conclude that there would be no significant environmental impact related to recreation for the proposed project, the No Project - No Build Alternative, or Design Alternative A.

- I-2-10 It is unclear what the commentator means by “revisiting the Master Plan.” The objectives of the proposed project were developed in consideration of the 32nd DAA’s mission statement, public policy, and feasibility. The whole of the proposed project was considered during the environmental review process and was found to be consistent with the stated project objectives. The comment does not contain any substantive statements or questions about the DEIR or the analysis therein. Therefore, no further response is necessary.
- I-2-11 The comment concludes the comment letter and does not contain any substantive statements or questions about the DEIR. Therefore, no further response is necessary.

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SANDRA GENIS  
1586 MYRTLEWOOD

COSTA MESA, CA. 92626

PHONE/FAX (714) 754-0814

May 2, 2003

Becky Bailey-Findley  
Chief Executive Officer  
32<sup>nd</sup> District Agricultural Association  
88 Fair Drive  
Costa Mesa, Ca.

Subject: DEIR, Orange County Fair and Exposition Center Master Plan (SCH#1989010088)

Dear Ms. Bailey-Findley:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Orange County Fair and Exposition Center Master Plan (SCH#1989010088). The DEIR is intended to address the environmental impacts associated with adoption and implementation of a proposed Master Plan for the Orange County Fair and Exposition Center located in the City of Costa Mesa in Orange County, California. The 32<sup>nd</sup> Agricultural District is the Lead Agency for this project.

I-3-1

It is my understanding that the project will entail reduction in the size of the existing amphitheater; demolition of various buildings; construction of additional exhibit space and administration facilities with a net increase of 176,394 square feet of such uses; demolition and replacement of an existing arena; construction of additional plazas and courts; reduction in the size of the equestrian center; and other miscellaneous improvements.

Implementation of the proposed Master Plan will be phased over nine to ten years. The DEIR has not been identified as a program or staged EIR, although it appears that it may function as such. A Program EIR is employed when, as here, there are a series of contemplated actions that are geographically related, are logical parts in a chain of contemplated actions, connected as a part of a continuing program of development. (14 Cal. Code of Reg. Section 15168). A Staged EIR is used when a project will involve many years of planning and requires numerous discretionary approvals over more than a two year period. (14 Cal. Code of Reg. Section 15167). A Master EIR is used when a project consists of a series of smaller projects, to be completed sequentially in a phased manner. (Pub. Res. Code sec. 21156-21158.5) It should be recognized that implementation of the proposed Master Plan may require subsequent of supplemental environmental documentation per Section 21166 of the California Government Code.

I-3-2

The DEIR further required investigation of impacts and/or mitigation measures to other agencies or to future studies or permits; studies or permits as yet unknown, with unknown results, with no dates certain, even though the DAA seeks to establish rights in its proposed development now. These deferrals to review after the review can have no impact and include water quality plans and, perhaps most critically, plans for control of noise. Because most of this is identified for review at

I-3-3

an administrative level, the public and, to a large extent, the Directors are essentially shut out of the review process for these aspects of the project.

This flies in the face of the full disclosure requirement which is the heart of CEQA. As stated in the CEQA Guidelines (Section 15003):

The EIR serves not only to protect the environment but also demonstrate to the public that it is being protected...The EIR is to inform other governmental agencies and the public generally...The EIR is to demonstrate to an apprehensive citizenry that the agency has...considered and analyzed the ecological implications..."

I-3-3

Where items are deferred to some indeterminate future administrative review or to other agencies, how will the Board and the public be informed of further action regarding these matters; matters that are required to be reviewed and grappled with now? How will the Board and the public be provided the opportunity to review further studies/actions prior to the actual development that is allegedly analyzed in the DEIR? How will the Board and the public be afforded the opportunity to comment upon these yet to be undertaken studies/actions? How can Board Members or the public appeal administrative decisions regarding as yet non-existent further studies and plans?

I-3-4

I-3-5

I-3-6

I-3-7

The failure of the DEIR actually to complete the studies when it matters, as a part of the environmental review process and before development rights are established, is but one example of how this DEIR thematically seeks to avoid meaningful and legally required environmental analyses.

I-3-8

The DEIR notes in a number of sections that the potential impact will be mitigated due to project design features. Although Section 15126 of the CEQA Guidelines states that mitigation measures proposed by an applicant must be distinguished from other measures, they are all still mitigation measures that need to be discussed and considered contemporaneously in the DEIR to be meaningful and lawful. They are not.

I-3-9

In 1988, the California Legislature passed AB 3180, effective January 1, 1989, which required that mitigation monitoring programs be prepared. This was in response to a number of studies which indicated that, in fact, many public agencies did not verify implementation of mitigation measures.

If a proposed action is adopted as a mitigation measure, it will have to be included in the monitoring program with specific agency responsibility assigned to see that the measure is implemented. This is designed to increase the likelihood that the mitigation will actually occur. A project design feature may change or be deferred. Unless the change was determined by a public agency to be so significant that a new EIR was required, the impact the feature was intended to address could remain unmitigated.

I-3-10

The use of "design features" could be -- and is -- utilized as a means of doing an end run around the requirements of AB 3180. It is thus essential and required to formally include as mitigation measures all measures identified as reducing the potential negative effects of a project, including "design features". Although the DEIR indicates that responsibilities and timing for design

features will be clearly stipulated, this is not included in the DEIR, and should be included in the mitigation monitoring plan. This will assure decision makers and the general public that all actions said to reduce the significance of a potential impact in an EIR will actually be implemented.

I-3-10

In addition to the essential, basic unlawful flaws discussed above, I have the comments and questions below on how particular the information in the DEIR is presented. Each of these items are themselves, though, so basic that each must be addressed in order for the DEIR to be considered legally adequate and to provide decision makers and the public with the information needed to evaluate the proposed project and its impacts.

I-3-11

### Project Description

A stable, accurate project description is the most basic and important factor in preparing a lawful EIR. It is the denominator of the document and, thus, of the public's and decision-maker's review. A vague or ambiguous project description will render all further analyses and determination ineffectual. It is critical that the project description be as clear and complete as possible so that the issuing agency and other responsible agencies may make informed decisions regarding a proposed project. The following issues must be addressed and other analyses in the EIR adjusted accordingly to be lawful:

A project description in an EIR must include all relevant parts of a project, including reasonably foreseeable future expansion or other activities which are part of the project. Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal. (1988) 47 Cal.3d 376, 253 Cal. Rptr. 426. The term "project" is defined "broadly" and encompasses "the whole of an action which has a potential for resulting in physical change in the environment, directly or ultimately, and includes the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies." Burbank-Glendale-Pasadena Airport Authority v. Hensler. (1991) 233 Cal.App.3d 577, 592, 284 Cal.Rptr. 498; see also Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 278, 118 Cal.Rptr. 249, 529 P.2d 1017; Sierra Club v. County of Sonoma. (1992) 6 Cal.App.4th 1307, 1315, 8 Cal.Rptr.2d 473; Manaster & Selmi, Cal. Envl. Law & Land Use Practice (1992) § 21.05, pp. 21-16-21-18.

I-3-12

The project description provides virtually no indication of what activities will be conducted in the proposed new and remodeled structures. Presumably these structures will be used for something. Absent information as to use and use and anticipated occupancy of the proposed structures, it is impossible to evaluate impacts of the proposed Master Plan.

I-3-13

In fact the project objectives contained in the DEIR include references to a Master Plan that will:

accommodate the growing events and exhibition market in Orange County,

and

restore concerts, plays, and other community events...to...Pacific Amphitheater.

I-3-14



However, the project description does not indicate how much growth in the market the proposed facilities are expected to accommodate. It is not until Section 4.12, in the last quarter of the document that any data regarding anticipated users and attendance is provided at all. Even this data is inadequate, limited only to an estimate of increased attendance during a few weeks during the annual county fair. I-3-15

Under the proposed Master Plan, exhibit space would approximately double, potentially doubling the size of events year round. Frequency and size of events are key factors in determining environmental impacts of the proposed Master Plan, yet little to no information is provided regarding these issues. What is the anticipated number of users, in terms of on-site populations, on a typical weekend? How many people would be anticipated to attend an "interim" event. How often is it anticipated that such events will be conducted? I-3-16

It is a stated objective of the proposed project to "encourage and accommodate simultaneous activities". How often will these "simultaneous activities" occur? How many people will be attending these "simultaneous activities" on a typical weekend? What about during an "interim event" Will the "interim event" become the "typical" weekend? Is this the goal of the 32<sup>nd</sup> Agricultural District? I-3-17

Will events limited to weekends? Some fairgrounds exhibitors already open their shows before the weekend or extend into the work week. What about concerts or plays at the amphitheater? Will these be limited to Saturdays and Sundays? Analyses in the DEIR seem to point in that direction, but that is not spelled out. If activities are NOT limited to weekends, then analyses for weekday activities must be provided in a recirculated DEIR. I-3-18

A new kitchen is also to be provided. Who is the new kitchen expected to serve? Will the kitchen provide food service on a year round basis? Will food service be limited to major events? Is this a resurrection of past proposals by the Agricultural District to construct a restaurant on the fairgrounds site? I-3-19

The project description is silent as to how parking will be provided for the additional fair attendees. It appears that additional parking will be provided on the northerly portion of the site in the existing equestrian area, while parking will be eliminated on the southerly portion of the site by the construction of new exhibit administration space. What is the net change in parking? I-3-20

During the annual fair, off-site parking at numerous locations is already needed. Are additional off-site parking areas proposed? Where? Is a parking structure proposed? Where? I-3-21

Where will project staging areas be located? This is of particular concern during mass grading in the amphitheater area and when large areas of the site may be subject to construction activity at the same time. I-3-22

Even where project information is provided it is incomplete and, at times, useless. For example we are told that Building 17 will be demolished, but site plans in the DEIR do not label Building 17; likewise references to demolitions of Buildings 13 and 15. It is not reasonable to expect the reviewer to automatically know the numbers of the existing buildings, even for those generally I-3-23

familiar with the fairgrounds.

I-3-23

All of the information discussed above must be provided and deficiencies remedied in a re-circulated DEIR in order that the public and decision makers may be fully informed as to all characteristics and potential impacts of the proposed project.

I-3-24

### Aesthetics

This section should address views from public streets such including, but not limited to, Fairview Road and Fair Drive.

I-3-25

This section must address impacts of on-site signage.

### Air Quality

The discussion of the existing regulatory framework must be updated to reflect current standards and planning efforts, including, but not limited to, current standards for fine particulates adopted in June 2002 and Air Quality Management Plan updates now underway.

I-3-26

Similarly, calculations of anticipated emissions should be based on the latest factors provided in EMFAC 2002 (version 2.2), as advised by the South Coast Air Quality Management District. SCAQMD recommends these factors be utilized in replacement of those included in the ten-year-old SCAQMD CEQA Handbook.

I-3-27

In addition to contributions to basinwide emissions, the DEIR must examine localized concentrations of pollutants generated by the large number of vehicles that will be parked at the fairgrounds and in surrounding areas during major events. This is of greatest concerns for reactive organic gases (ROG). Evaporative emissions from tires, hoses, lubricants etc., continue whether on not the vehicles are running and are even generated by Zero Emission Vehicles (ZEVs). This a particular problem with older cars which may often become "liquid leakers". Factors are included in EMFAC 2002, a change from older, superceded, models such as EMFAC7G.

I-3-28

### Cultural Resources

The old Santa Ana Army Air Base buildings at the fairgrounds are associated with events that have made a significant contribution to the broad pattern of California history as they are associated with the precipitating events that led to the huge post-World War II boom in the defense industry and burgeoning growth in southern California. Further, over past decades, the structures have been associated with numerous locally and regionally significant events. Therefore, their loss would be significant on at least a regional level.

I-3-29

As a mitigation measure, prior to further alteration or destruction of the buildings, the Costa Mesa Historical Society or other similar group should be afforded the opportunity to photograph and document SAAAB structures. Further, groups or individuals dedicated to historic preservation should be afforded the opportunity to preserve the structures.

I-3-30

### Hydrology and Water Quality

Based on a review of Exhibits 3.2.1 and 4.1.1, it appears that the proposed project will result in a significant increase in impervious surfaces on the site, particularly in Drainage Area G. However, the analysis actually predicts a reduction in site runoff due to the elimination of the slopes at the amphitheater. I-3-31

What assumptions were made regarding runoff and percolation at the existing site? What acreage of impervious surfaces was assumed for existing conditions? What will be the acreage of impervious surfaces at Master Plan buildout? This must be quantified and mapped. I-3-32

Do proposed measure to treat runoff take into account the large amount of animal waste that is generated at times in areas other than the equestrian center? How will this affect operation and maintenance of the proposed measures to maintain water quality? I-3-33

### Land Use

This section should detail the actual activities that will utilize the proposed physical improvements to the site. I-3-34

### Noise

Noise is, perhaps, the most critical environmental factor associated with activities at the Orange County Fair and Exhibition Center. It has been the subject of decades of litigation and countless hours of public debate. It is thus deplorable to find a noise "analysis" so wholly inadequate in both its analysis of significance and its lack of commitment to any mitigation, indeed its lack of identification of any specific mitigation. I-3-35

Thresholds of significance for noise should include both the City of Costa Mesa and Orange County noise ordinances. While, as a state agency, the 32<sup>nd</sup> Agricultural District claims statutory exemption from such local ordinances, these noise ordinances reflect community standards for acceptable noise levels. Thus, by definition noises in excess of those specified in the ordinances would be considered significant, even though the noise might, by some legal loop-hole, be technically legal. I-3-36

Further, the thresholds of significance must include the noise levels specified in the August 18, 1980 agreement in settlement of Civil Action No. 31-79-36 in the Superior Court in the County of Orange. This settlement was entered into freely and lawfully by the 32<sup>nd</sup> Agricultural District and *does* apply legally to activities at the fairgrounds. This settlement, which is mentioned in passing in the DEIR, sets noise limits for fairground operations. While slightly higher limits are permitted during the annual fair, there is no time at which the fairgrounds is given a carte blanche with regards to noise, although the EIR preparers appear to believe this would be appropriate (Page 4.8-27). I-3-37

Further, even if the noise limits specified in the 1990 Order are considered most appropriate, these limits should be applied to all residences potentially affected by excess noise. The residence at Serra Way was selected by the judge in the case not because it was somehow okay for other residents even closer to the fairgrounds to suffer higher noise levels, but because that was the residence of the named plaintiff. The judge, therefore, ruled only in the case of the Serra Way residence.

I-3-38

Most mind boggling, is the proposed "mitigation measure" which commences with

Should the 32<sup>nd</sup> DAA Board of Directors decide to use the amphitheater for nonfair concert events...

as if this were some speculative outside possibility, when a stated objective of the proposed Master Plan is

I-3-39

to restore concerts, plays, and other community events...to...Pacific Amphitheater.

The "mitigation measure" then goes on to suggest a number of possibilities, in a general way, which might--or might not--achieve acceptable sound levels. In accordance with Section 15126 (b) of the CEQA Guidelines, an EIR must identify mitigation measures that *will* be implemented, not just a list of ifs.

Further, some of the measures proposed may have impacts of their own which must be examined in accordance with Stevens v. City of Glendale. For example, some of these would involve construction impacts. Full enclosure of the amphitheater would enhance its potential use as a year round facility, thereby resulting in previously unanticipated impacts on year-round traffic and year-round noise.

I-3-40

These major, conceptual flaws are each individually sufficient to render this section wholly inadequate to fulfill the purposes and requirements of CEQA. In addition, numerous other, smaller flaws and errors occur in this section. For example, the discussions of sensitive uses on Page 4.8-3 and Page 4.8-23 fail to include the adjacent churches and public park. Page 4.8-8 states that "the human ear cannot detect a change in noise if the change is 3dBA or less" in a what might appear to be a gratuitous attempt to minimize the reviewers' interpretation of what should be considered acceptable noise levels. Yet on Page 4.8-1, the DEIR states that changes in noise levels of 1.0 to 3.0 dB may be noticeable in a laboratory environment, although louder noises would probably not be noticed in an exterior environment. Page 4.8-1 does, however, state that "changes in noise levels of less than 1.0 dB [emphasis added]...are inaudible to the human ear".

I-3-41

I-3-42

At a minimum, a recirculated DEIR should include a thorough discussion of noise mitigation measures that *will* be implemented to control noise at the amphitheater, along with their anticipated effectiveness in mitigating unwanted sound and the impacts of those measures.

I-3-43

### Public Services and Utilities

This section is almost completely devoid of any actual analysis. While identified thresholds of significance rightly refer to project demand for service, no such demand is ever quantified in the DEIR. I-3-44

The DEIR must be revised to include a quantified estimate of existing usage levels for each utility or service addressed, a quantified estimate of future use of each utility or service for each phase, and identification of remaining additional capacity for each utility or service, together with any need for staffing, supply, or infrastructure improvements. In particular, local law enforcement and traffic control agencies have experienced extreme demands during annual fair events. This must be actually analyzed. I-3-45  
I-3-46

### Recreation

During the annual fair event and certain "interim events" Tewinkle Park is nearly unreachable, and parking at the park is fully utilized by patrons of fairgrounds events. This section must address how access to this community recreation facility, including the only dog park for many miles, would be affected. I-3-47

### Traffic and Circulation

In limiting the discussion of traffic in the DEIR to only weekend events, the DEIR becomes invalid for weekday events, and precludes weekday usage of the proposed facilities to be developed under the Master Plan absent additional environmental documentation. Is it the 32<sup>nd</sup> DAA's intention to utilize the fairgrounds only on Saturday and Sunday? Will the fairgrounds go dark Monday through Friday? Year round? If not, analyses of impacts on weekday traffic must be conducted and included in a recirculated DEIR. I-3-48

It is not adequate to provide such analyses on a piecemeal basis later as opportunities for week day use arise. The DAA is reminded that an EIR must encompass the *whole* of an action, as noted above. I-3-49

Information on actual driveway counts for events at the fairgrounds, including the annual fair event must be included in order to evaluate existing conditions and project future impacts. This should include all access points that will potentially be utilized, not just the main entrance on Fair Drive. For fair events, this should also include off-site parking lots utilized for fair patrons, volunteers, exhibitors, and employees. I-3-50  
I-3-51

Further, it is disingenuous to claim that fairgoers driving in from Riverside or La Palma will simply do something else is parking lots are full (Page 4.12-31). On the contrary, in the past fairgoers have parked in surrounding neighborhoods and at other nearby facilities when on-site lots are full. In fact, the DAA itself direct employees and volunteers to off-site lots. Further, if fairgoers will, indeed, drive to the fairgrounds and then continue elsewhere due to lack of parking, this vehicular activity in the area must be quantified and analyzed. I-3-52  
I-3-53

The existing levels of service for weekend peak hours appear to be highly optimistic, based on weekend driving experiences and the high degree of concern expressed regarding weekend traffic in recent discussions of the Orange Coast College swap meet. What time is peak hour? How was this determined? Was it based on any actual hour by hour counts at the locations identified? I-3-54  
I-3-55

The DEIR appears to assume a vehicle occupancy of about 2.5 people per vehicle. How was this derived? Were actual counts made, comparing fair attendance and parking revenues? How were individuals with parking passes or using off-site lots included? How was it determined whether or not this occupancy rate should apply to non-fair events? I-3-56

To mitigate the impact of construction on local roadways, particularly trucks exporting excess fill material and demolition debris, and additional mitigation measure should be adopted specifying that all construction traffic will be limited to Newport Boulevard and Fair Drive. I-3-57

**Conclusion**

As currently presented, the DEIR is thoroughly flawed in almost every facet imaginable, is deficient in too many respects to summarize and must re-circulated. As currently constituted, the document is wholly inadequate to fulfill the purposes of CEQA. Once again, thank you for this opportunity to comment. I-3-58

Sincerely,

  
Sandra Genis

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## SANDRA GENIS

- I-3-1 Introductory comment. No response necessary.
- I-3-2 The EIR for the proposed Master Plan is a project EIR. The intent of the EIR for the Master Plan is to provide CEQA environmental review for all components of Master Plan implementation. The OCFEC acknowledges that additional environmental documentation and review for subsequent projects carried out under the Master Plan may be necessary per CEQA law and the CEQA Guidelines. A determination will be made at the time these projects are implemented whether or not to perform additional environmental review subject to CEQA Guidelines Section 1516(a).
- I-3-3 All project impacts are disclosed in the DEIR. In the event that supplemental or subsequent environmental review is needed to comply with CEQA, the appropriate environmental document will be prepared and publicly noticed by OCFEC as required by CEQA Guidelines Sections 15162 and 15163.
- I-3-4 The 32nd DAA respectfully disagrees with the statement that each identified mitigation measure or the additional studies required prior to completion and construction are required at this time. Please see Responses I-3-8 and I-3-9.
- I-3-5 The 32nd DAA shall carry out all projects implementing the Master Plan consistent with the requirements of CEQA and the CEQA Guidelines. All required noticing shall be carried out by the OCFEC subject to CEQA Guidelines. In particular, CEQA Guidelines beginning with Section 16140 shall apply relative to subsequent environmental review, if the OCFEC determines that subsequent environmental review is required, as specified in CEQA Guidelines Section 15162.
- I-3-6 Please see Responses I-3-4 and I-3-5.
- I-3-7 Please see Responses I-3-4 and I-3-5.
- I-3-8 The DEIR does not, as stated in the comment, seek to avoid environmental analyses. On the contrary, the DEIR fully discloses all relevant environmental analyses related to Master Plan implementation as required by CEQA. The Master Plan includes sufficient detail to analyze environmental impacts of the components of the Master Plan. However, construction level details are not available to provide engineered solutions to all the problems that have been identified. Therefore, mitigation has been put forward to offset impacts determined to be significant. Appropriately, those solutions in the form of mitigation will be included in project design and project implementation. The commentator's opinion will be forwarded to the decision makers for their consideration.



- I-3-9 It appears that the commentator partially misquotes CEQA Guideline Section 15126.4. Project Design Features are included in the EIR to indicate how the project's design and/or improvements will positively affect the environment or off-set project impacts. Therefore, it is not clear as to the actual subject of the comment, and as a result no response can be prepared.
- I-3-10 The author of the comment misinterprets the use of design features in this EIR and directly advances to conclusions regarding the practical implementation of Master Plan components. The Project Design Features of the Master Plan are part of, and integrated into, the project description. The OCFEC fully intends to implement the project as proposed in the Master Plan. The use of Project Design Features in the EIR is to point to those project components that lessen the environmental effects of existing Fair activities or other existing on-site operations or lessen anticipated environmental effects of Master Plan implementation. To the extent that components of the Master Plan are not implemented in a timely manner, or are removed from the Master Plan, such a change to the Master Plan may constitute a changed project and could be subject to environmental review per CEQA Guidelines Section 15162. Please also see Response to Comment I-3-9. Please also see Responses 1-3-2 through 1-3-8 regarding subsequent environmental review requirements as stipulated in the CEQA Guidelines.
- I-3-11 The 32nd DAA considers the DEIR to meet all of the requirements of CEQA and the CEQA Guidelines. The opinion regarding the adequacy of the DEIR will be forwarded to the decision makers for their consideration.
- I-3-12 The 32nd DAA considers the DEIR to meet all of the requirements of CEQA and the CEQA Guidelines. The opinion regarding the adequacy of the DEIR will be forwarded to the decision makers for their consideration.
- I-3-13 The structures will accommodate the existing uses of Fairgrounds consistent with project objectives cited on page 3-13 of the DEIR. It is anticipated that the current Fair and non-Fair activities will occupy these structures, consistent with existing operations and the proposed Master Plan. The analyses included in the EIR address the use of these structures for Fair and non-Fair activities, as described in the DEIR Project Description, Section 3.0, and the proposed Master Plan. In addition, Fair and non-Fair operations and facilities are further described in Attachment A in Volume VI of the FEIR.
- I-3-14 Please see Response 1-3-13. The Project Description includes a full listing of all project components and project objectives. To clarify the Project Description, additional detail has been included in the Errata and Attachments A and B in Volume VI.
- I-3-15 The Master Plan does not attempt to predict future programming of site facilities, other than to indicate that Fair activities and non-Fair activities will continue to occur, much as they have occurred in the past, on an annually scheduled basis. There will be some change to activities and operational changes outlined in the Master Plan. Square footages of buildings that will be changed are further clarified in Attachment A in Volume VI of the FEIR. The

DEIR fully discloses these changes and analyzes their impacts. Therefore, it is not necessary to expand on the DEIR analysis. Please also see Responses to Comments I-3-13 and I-3-14.

- I-3-16 The OCFEC is not a typical commercial, residential, institutional, or industrial use for which orthodox attendance generation can be applied. The programming is varied in terms of both type and attendance. As such, the commentator make an erroneous assumption. First, both the exhibit and administrative offices will increase if the full implementation of the Master Plan is realized. Also, it is incorrect to assume an increase in exhibit square footage will correspondingly increase attendance. Also see Responses to Comments I-3-13 through I-3-15.

The commentator is accurate, however, in identifying that an increase in attendance (“frequency and size of events”) may result in environmental impacts. As such, Section 4.12, Traffic and Circulation, made conservative growth assumptions based upon the proposed Master Plan. Please refer to page 4.12-17 of the DEIR. Corresponding air quality and noise impacts were assessed based upon these same assumptions, as noted in Sections 4.2 and 4.8, respectively.

Events of various sizes and types occur nearly every weekend (including the swap meet) on the OCFEC. This characteristic is not expected to change with implementation of the Master Plan.

- I-3-17 The OCFEC has a long history of accommodating different activities on the site. Objective No. 3 (page 3-13, DEIR) is a statement affirming this existing characteristic of the OCFEC. Please refer to Response to Comment I-3-16 for issues regarding attendance numbers. “Interim” and “Typical” are terms used in Section 4.12 of the DEIR to assign an identity to the conservative growth assumption used for analyzing potential traffic impacts. The goal of the 32nd DAA is to fulfill its Mission Statement as noted in Response to Comment L-1-11 and further articulated in Section 3.3, Project Objectives, of the DEIR.
- I-3-18 The primary activity at the OCFEC occurs during the weekends. It is the nature of exhibits, festivals, and non-hotel hosted trade shows to take place during the weekends. Typically, “weekend” events and/or shows occur during a Friday, Saturday and Sunday schedule. As such, Thursdays are used to set up and Mondays are used to close out. These operational characteristics are not expected to change and was the subject of the traffic analysis agreed to by the City of Costa Mesa and OCFEC. However, there has been no prohibition of activities during any day of the week. This, too, will continue. Please refer to Response to Comment L-1-9 pertaining to the request to recirculate the DEIR.
- I-3-19 The OCFEC currently has a kitchen on the project site known as Baja Blues (formerly Blues and Brews). The Master Plan calls for the expansion and relocation of the existing kitchen facilities. Like the existing kitchen, the expanded kitchen will be used year-round by master concessionaires to provide food and beverage services to various events and

programs on the project site. This use is a component of the Master Plan and is not related to a past project.

- I-3-20 Please see Responses to Comments I-3-13 through I-3-16.
- I-3-21 The proposed Master Plan is limited to on-site changes to the OCFEC. Outside of the Master Planning process, the 32nd DAA and the OCFEC staff have arranged off-site/remote parking opportunities for guests. The OCFEC has between 7,700 and 10,300 off-site/remote parking spaces available to guests during large events like the summer Fair. Off-site parking agreements are subject to Conditional Use Permits (CUP) requiring the approval of the City of Costa Mesa Planning Commission. As such, each CUP is subject to the requirements of CEQA. The City of Costa Mesa conducts CEQA review prior to approval of each CUP. Please see Attachment A for the location of off-site parking areas and number of parking spaces provided at each location.
- I-3-22 Construction staging will occur on the site. The particular locations have not been identified at this time because construction schedules and funding opportunities have not been defined.
- I-3-23 Please see Responses to Comments I-3-13 through I-3-16. Please see Attachment B for clarification of existing building numbers.
- I-3-24 Each comment is provided a response, and the project description has been clarified in Volume VI. There are no environmental implications associated with the clarifications in the Project Description. Therefore, no further response is necessary to comply with CEQA.
- I-3-25 Views from Fairview Road and Fair Drive will be changed as represented in View Simulations A and B, Figures 4.1.2 and 4.1.3, respectively. View impacts from roadways are specifically discussed on pages 4.1-6 and 4.1-10. Please refer to Response to Comment L-1-31 regarding the issue of signs.
- I-3-26 The discussion of the existing regulatory framework in the DEIR was current at the time the DEIR was prepared. However, the following update since the DEIR was prepared can be added to the discussion of Regional Air Quality Management Plan: "The SCAQMD has completed a draft version of the 2003 AQMP and has been holding public workshops to solicit public comments on the document." In addition, Table 4.2.A, Ambient Air Quality Standards, can be replaced with the new table issued by the California Air Resources Board in March 2003 to reflect more recent changes in the standards and their descriptions. These changes have no effect on the analyses provided in the DEIR.
- I-3-27 The project's long-term operational emissions were calculated with the URBEMIS 2001 model (which includes emission factors from EMFAC 2000, approved by the U.S. EPA in January 2002), based on projected vehicular traffic trips, the standard Southern California (or South Coast Air Basin) vehicle mix, and average trip lengths. URBEMIS 2001 is still

the current version of the operations emissions model issued by the California Air Resources Board that calculates emissions from both area (stationary) sources and mobile (vehicle) sources.

In addition, EMFAC 2002 was officially approved by the U.S. EPA on April 1, 2003. There is a three-month grace period (until June 30, 2003) before EMFAC 2002 is required for the assessment of new projects. Since analysis of the project was completed long before the approval date (April 1, 2003) of EMFAC2002, the project is not required to recalculate the emissions for a project impact analysis.

- I-3-28 Project-related vehicular emissions are included in Table 4.2.G, Project Operational Emissions, on page 4.2-22 of the DEIR. Localized project impacts, in terms of a CO hot spot analysis, were included in Tables 4.2.H to 4.2.M and text on pages 4.2-23 through 4.2-31. The proposed project is not required to recalculate emissions with EMFAC 2002, as discussed in Response to Comment I-3-27 above.
- I-3-29 The analysis included in the DEIR, page 4.4-6, specifically concludes that the structures remaining on the site do not constitute a historical or cultural resource that is unique or architecturally or historically significant. Therefore, their loss is not considered significant. Without corroborating evidence to the contrary, the findings of the DEIR can be relied upon for CEQA clearance purposes. The opinion of the author regarding the importance of the structures shall be forwarded to the decision makers for their consideration.
- I-3-30 Please see Response I-3-29. The mitigation suggested is not required because there is no significant impact related to changes to the structures. The opinions of the commentator will be forwarded to the decision makers.
- I-3-31 The analysis in the DEIR regarding the reduction of impervious surface is correct.
- I-3-32 The information requested regarding hydrology and drainages is indicated in the DEIR, Section 4.6. The drainage areas of the project site are described on Page 4.6-5. As also indicated on the same page, hydrology of the site was modeled using the assumptions and methods indicated in the Orange County Hydrology Manual. Existing drainages and proposed drainages are included in the DEIR in Figures 4.6.1 and 4.6.2, respectively. Table 4.6.3 shows the existing surface hydrology conditions and Table 4.6.D shows the proposed conditions.
- I-3-33 Animal waste is taken into consideration in the stormwater treatment program.
- I-3-34 Please see Responses I-3-15 and I-3-24. All Master Plan projects are specified in the DEIR Project Description, Chapter 3.0, and are further detailed in Attachments A and B in Volume VI.
- I-3-35 Please refer to Response to Comment L-1-6. Mitigation Measure 8-1 was included for noise concerns during project construction. Mitigation Measure 8-2, as amended, was

included for noise concerns related to use of the amphitheater. No other potentially significant noise impacts were identified.

- I-3-36 Please refer to Response to Comment I-3-35.
- I-3-37 The 1990 Order superseded the 1980 agreement. The commentator's assertion that the "fairgrounds is given a carte blanche with regards to noise" is erroneous. Please see Responses to Comments I-3-35, L-1-8, and L-1-62.
- I-3-38 Although the residence at 947 Serra Way is not the residence closest to the Fairgrounds, it is the location where the noise level threshold is set and monitored to meet the agreement set out in the 1990 Order. Please refer to Response to Comment L-1-6.
- I-3-39 Please refer to Responses to Comments L-1-6 and L-1-62.
- I-3-40 Noise impacts associated with the identified mitigation measures would be less than significant. For example, construction noise impacts were discussed on pages 4.8-21 through 4.8-24 of the DEIR, including Mitigation Measure 8-1. As stated, construction noise impacts would be less than significant. If the amphitheater is fully enclosed, noise impacts from concert events held in the amphitheater would be reduced to less than significant levels even if it became a year-round facility. Noise associated with vehicular traffic is based on a per-event or per-day basis and would be the same whether the facility was for year-round or single-event use. The noise levels for a year-round facility would not exceed what was evaluated in the DEIR.
- I-3-41 Please see Response to Comment I-3-35. Churches and recreational parks in the same neighborhood of the residential homes are subject to similar noise concerns and would experience noise levels similar to those analyzed for the homes. All uses are considered equal in terms of noise sensitivity.
- I-3-42 As stated on pages 4.8-1 and 4.8-8 of the DEIR, changes in noise levels in outdoor environments need to be 3 dBA or greater (over a relatively short period of time) to be perceptible to the human ear. When the change occurs gradually over a (relatively) longer period of time (such as days, weeks, or months), a 3 dBA difference is not noticeable. In a laboratory or controlled environment, changes between 1 dBA and 3 dBA over a relatively short period of time would be noticeable. Changes of less than 1 dBA are not perceptible to the human ear even in a laboratory or controlled environment.
- I-3-43 Please refer to Response to Comment I-3-39.
- I-3-44 All public service and utilities providers were sent Notices of Preparation and copies of the DEIR for review and comment. In addition, each public service and utility provider was directly contacted to review the Master Plan and its potential impact on services and utilities. This research and inquiry was conducted in this fashion because of the acknowledged expertise and responsibility of each service and utility provider. This

research, and subsequent findings, is documented in Section 4.10 of the DEIR and, furthermore, is consistent with CEQA Guidelines Section 15125, 15126, and 15126.2.

- I-3-45 Please refer to Response to Comment I-3-44.
- I-3-46 Please refer to Response to Comment I-3-44.
- I-3-47 Please refer to Response to Comment L-1-52.
- I-3-48 Please refer to Response to Comment L-1-75.
- I-3-49 Please refer to Response to Comment I-3-48.
- I-3-50 The overall approach and scope of work of the Traffic Impact Analysis is consistent with all previous analyses of the Fair (which have been approved by a joint action of the Costa Mesa City Council and the Fair Board of Directors). The lack of driveway counts does not preclude a complete analysis of existing conditions and future project impacts, as demonstrated by the previously approved analyses. Please also see Responses to Comments L-1-29 and L-1-67 through L-1-146 regarding the traffic and parking analyses.
- I-3-51 Please refer to Response to Comment I-3-50. Please also see Responses to Comments L-1-29 and L-1-67 through L-1-146 regarding the traffic and parking analyses.
- I-3-52 Please refer to Response to Comment L-1-67. Please also see Responses to Comments L-1-29 and L-1-67 through L-1-146 regarding the traffic and parking analyses.
- I-3-53 Please refer to Response to Comment L-1-67. Please also see Responses to Comments L-1-29 and L-1-67 through L-1-146 regarding the traffic and parking analyses.
- I-3-54 The commentator is expressing an opinion on the results of the traffic impact analysis. As there are no substantive questions about the DEIR contained in this comment, no further response is necessary.
- I-3-55 Weekend peak-hour traffic volumes were observed between 11:00 a.m. and 2:00 p.m. The peak hour at each intersection varies and is shown in the traffic counts that are included as an appendix to the TIA. Please also see Responses to Comments L-1-29 and L-1-67 through L-1-146 regarding the traffic and parking analyses.
- I-3-56 Please refer to Response to Comment L-1-110.
- I-3-57 Comment noted. Please see Mitigation Measure 12-1, which requires the 32nd DAA to work with the City of Costa Mesa to establish appropriate haul routes for construction traffic and postproject street maintenance procedures.

- I-3-58 Comment noted. The comment is an opinion that the DEIR is flawed and does not fulfill the purposes of CEQA. The 32nd DAA respectfully disagrees with this opinion. The DEIR fully discloses all relevant environmental analyses related to Master Plan implementation as required by CEQA. The commentator's opinion will be forward to the decision makers for their consideration. Because there are no facts or analysis provided in the comment, no further response is necessary.

## ATTACHMENT A

*The following tables are referenced in Responses to Comments L-1-3, L-1-20, L-1-23, L-1-24, L-1-25, L-1-28, I-3-13, I-3-14, I-3-15, I-3-21, and I-3-34.*



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**Table 1: Existing and Master Plan Building Square Footage Summary**

	Existing	Master Plan	Change
Amphitheater	351,560	254,400	-97,160
Tickets/Concessions	135,200	0	-135,200
Centennial Farms	168,000	196,000	28,000
Festival Grounds	306,250	245,000	-61,250
Carnival Lot	318,150	322,000	3,850
Central Park	0	302,900	302,900
Plazas/Courts	71,875	170,400	98,525
Exhibits & Offices	174,921	291,146	116,225
Kitchen	5,633	34,500	28,867
Silo	2,730	2,730	0
Barn	5,190	5,190	0
Storage	11,130	45,900	34,770
Yard	28,050	60,000	31,950
Livestock	97,200	97,200	0
Judging Ring	0	43,200	43,200
Arena	110,136	116,100	5,964
Little Theater	5,960	0	-5,960
Memorial Gardens	3,411	3,411	0
Arlington Theater	97,344	0	-97,344
Equestrian Center	500,940	330,000	-170,940
Snack bars	7,760	0	-7,760
Restrooms	2,550	0	-2,550
<b>Total</b>	<b>2,403,990</b>	<b>2,520,077</b>	<b>116,087</b>

**Table 2: FAR Analysis**

	Existing	Master Plan	Change
<b>Amphitheater</b>	351,560	254,400	-97,160
<b>Tickets/Concessions</b>	135,200	0	-135,200
<b>Exhibits &amp; Offices</b>	174,921	291,146	116,225
<b>Kitchen</b>	5,633	34,500	28,867
<b>Silo</b>	2,730	2,730	0
<b>Barn</b>	5,190	5,190	0
<b>Storage</b>	11,130	45,900	34,770
<b>Livestock</b>	97,200	97,200	0
<b>Little Theater</b>	5,960	0	-5,960
<b>Memorial Gardens</b>	3,411	3,411	0
<b>Snack bars</b>	7,760	0	-7,760
<b>Restrooms</b>	2,550	0	-2,550
<b>Total w/ Amphitheater</b>	803,245	734,477	-68,768
<b>Total w/o Amphitheater</b>	451,685	480,077	28,392

Note: Includes roofed structures enclosed on all sides by walls  
(and amphitheater as indicated)

	FAR
<b>Existing</b>	0.07
<b>Master Plan (open Amphitheater)</b>	0.08
<b>Master Plan (enclosed Amphitheater)</b>	0.11

**Table 3: Master Plan Parking Estimates**

<b>ON-SITE PARKING</b>		
<b>Lot</b>	<b>Fair</b>	<b>Non-Fair</b>
<b>A</b>	<b>2,302</b>	<b>2,302</b>
<b>B</b>	<b>1,907</b>	<b>1,907</b>
<b>C</b>	<b>619</b>	<b>619</b>
<b>D</b>	<b>947</b>	<b>947</b>
<b>E</b>	<b>584</b>	<b>584</b>
<b>Lot F and Festival Grounds</b>	<b>0</b>	<b>1,107</b>
<b>G</b>	<b>500</b>	<b>500</b>
<b>H</b>	<b>900</b>	<b>900</b>
<b>Total</b>	<b>7,759</b>	<b>8,866</b>

	<b>Fair</b>	<b>Non-Fair/Non-Marketplace</b>
<b>Existing</b>	<b>7,621</b>	<b>9,163</b>
<b>Master Plan</b>	<b>7,759</b>	<b>8,866</b>
<b>Change</b>	<b>138</b>	<b>-297</b>

<b>OFF-SITE PARKING</b>		
	<b>Low</b>	<b>High</b>
<b>Orange Coast College</b>	<b>2,646</b>	<b>5,177</b>
<b>Costa Mesa High School</b>	<b>2,000</b>	<b>2,000</b>
<b>AAA Lot</b>	<b>800</b>	<b>800</b>
<b>Davis School</b>	<b>1,000</b>	<b>1,000</b>
<b>Experian Parking Structure</b>	<b>1,300</b>	<b>1,300</b>
<b>Total Range</b>	<b>7,746</b>	<b>10,277</b>

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## ATTACHMENT B

*The following tables are referenced in Responses to Comments L-1-3, L-1-28, I-3-14, I-3-23, and I-3-34.*

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LSA

ATTACHMENT B



Orange County Fair and Exposition Center  
Existing Facilities



## ERRATA

# ERRATA

## INTRODUCTION

This Errata is provided to clarify, refine, and provide supplemental information for the Orange County Fair and Exposition Center (OCFEC) Master Plan Draft Environmental Impact Report (Draft EIR). Many of the EIR changes are corrections or clarifications to the text of the original Draft EIR. Other changes to the EIR clarify the analysis in the EIR based upon the information and concerns raised by commentators during the public comment period. None of the information contained in this EIR Errata constitutes significant new information or changes the analysis or conclusions of the OCFEC Master Plan Draft EIR.

The information included in the errata resulting from the public comment process does not constitute substantial new information that requires recirculation of the Draft EIR. CEQA Guidelines Section 15088.5 states, in part:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The changes to the Draft EIR included in this Errata **do not** constitute “significant” new information because:

1. No new significant environmental impact would result from the project or from a new mitigation measure;
2. There is no substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the identified significant impacts to a level of insignificance;
3. No feasible project alternative or mitigation measure considerably different from others previously analyzed has been proposed or identified that would clearly lessen the significant environmental impacts of the project; and
4. The Draft EIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment were precluded.

Therefore, recirculation of the Draft EIR is not required because the new information added to the EIR through this Errata clarifies or amplifies or makes insignificant modifications to the already adequate Draft EIR.

For simplicity, the errata below are in the same order as in the EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by underlining (underline) and a vertical line in the right hand margin where text has been added. The applicable page numbers from the DEIR are also provided where necessary for easy reference.

## 1.0 EXECUTIVE SUMMARY

**Table 1.A—Summary of Project Design Features, Project Impacts, and Mitigation Measures**

Impacts	Mitigation Measures	Level of Significance After Mitigation
	<p><i>Mitigation Measure 2-3</i></p> <p>In order to reduce fugitive dust from on-site and off-site vehicle activity, the following measures shall be implemented by the applicant and the contractor during the period of construction:</p> <p>The California Construction Authority shall verify that the following provisions are included in the grading contractor's contract prior to issuance of the Notice to Proceed:</p> <ol style="list-style-type: none"> <li>1. All trucks hauling, dirt, sand, soil, or other loose materials are to be covered, or shall maintain at least two feet of freeboard in accordance with the requirements of California Vehicle Code section 23114 ("freeboard" means vertical space between the top of the load and top of the trailer); covering shall be tightly secured to truck.</li> <li>2. Sweep adjacent streets once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water). Sweep streets immediately after period of heaviest vehicular track-out activity.</li> <li>3. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. Set up truck washing area on paved access road area so subsequent truck travel on unpaved roads can be eliminated.</li> </ol>	

4. Pave or provide gravel roadbed on all on-site construction access roads at least 100 feet onto the site from main road.
5. Apply water three times daily, or apply non-toxic soil stabilizers, according to manufacturers' specifications, to all inactive construction areas (previously graded areas inactive for 10 days or more).
6. Traffic speeds on all unpaved roads shall be reduced to 15 mph or less; effective traffic control or signage shall be installed and maintained.
- ~~7. Daily and weekly monitoring reports by the monitor, acceptable to the 32<sup>nd</sup> DAA Board of Directors and the California Construction Authority, shall be submitted to the California Construction Authority Project Manager, by the contractor.~~

The potential impacts of the proposed project on cultural resources are not considered to be significant because:

- A records search through the South Central Coastal Information Center of the California Historical Resource Information System was conducted for the Fairgrounds property and yielded no information on previously recorded archaeological or historic resource sites within the study area;
- The OCFEC does not contain any physiographic features such as stream courses or knolls that would have attracted Native American settlement to the study area;
- Due to the high level of disturbance through agricultural, military, and Fair use of the project area, it is unlikely that any significant archaeological resources will be identified; and
- None of the buildings on the OCFEC from the Santa Ana Army Air Base retain their integrity or ability to convey historical significance.

***Mitigation Measure 4-1***

Prior to issuance of the Notice to Proceed, the California Construction Authority shall verify that a County of Orange certified paleontologist has been retained to observe grading activities and salvage and catalogue fossils as necessary. The paleontologist shall be present at the pregrading conference, shall establish procedures for paleontological resource surveillance, and shall establish, in cooperation with the OCFEC and the California Construction Authority, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the fossils. If major paleontological resources are discovered, the paleontologist shall determine appropriate actions, in cooperation with the project developer, to ensure proper exploration and/or salvage. Excavated finds shall be prepared to the point of identification and offered to the County of Orange, or it's a designee within the County of Orange, on a first refusal basis. If any paleontological

With the implementation of Mitigation Measures 4-1 through 4-3, all potential impacts to cultural and historical resources are reduced to less than significant levels.

The following three mitigation measures are included as precautionary measures to ensure that significant impacts do not occur.

resources are found, the paleontologist shall submit a follow-up report which shall include the period of inspection, a catalogue and analysis of the fossils found, and present repository of the fossils to the Orange County Natural History Museum, County of Orange or its designee. The 32nd DAA should be prepared to pay curation fees.

***Mitigation Measure 4-2***

Prior to issuance of the Notice to Proceed, the California Construction Authority shall verify that a County of Orange certified archaeologist has been retained, shall be present at the pregrading conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the OCFEC and the California Construction Authority, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the artifacts as appropriate. If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the OCFEC and the California Construction Authority, for exploration and/or salvage. The archaeologist shall submit a follow-up report to the Orange County Natural History Museum, County of Orange or a designee within the County of Orange which shall include the period of inspection, a catalogue and analysis of any artifacts found, and present repository of the artifacts. Excavated finds shall be offered to the County of Orange, or designee, on a first refusal basis. The 32nd DAA should be prepared to pay curation fees.

***Mitigation Measure 4-3***

The California Construction Authority shall verify that the following provision is included in the grading contractor's contract prior to issuance of the Notice of Proceed: If human remains are encountered during the course of

construction, project-related activities in the immediate vicinity of the find will be temporarily diverted. The County Coroner will be contacted within 24 hours. The County Coroner will determine whether the remains are recent. If the remains are determined to be Native American in origin, the Native American Heritage Commission will be contacted immediately to determine the most likely descendant (MLD). The MLD will have the opportunity to become involved with the final disposition of the remains following scientific analysis.

***Mitigation Measure 6-2***

The California Construction Authority shall verify that the following provisions are included in the construction contractor's contract prior to issuance of the Notice to Proceed: The Construction Contractor shall be responsible for performing and documenting the application of BMPs identified in the Storm Water Pollution Prevention Plan (SWPPP). Weekly inspections shall be performed on the sand bag barriers and other sediment control measures called for in the SWPPP. Monthly reports shall be maintained by the California Construction Authority Project Manager. Inspection records and compliance certification reports shall be submitted to the California Construction Authority Project Manager on a monthly basis and shall be maintained for a period of three years. Inspection schedules shall be monthly during the dry season and weekly during the wet season.

The contractor shall inspect BMP facilities before and after every rainfall event that is predicted to produce observable runoff, and at 24 hour intervals during extended rainfall events, excepting days when there is no ongoing site activity. Pre-storm activities will include inspection of the major storm drain grate inlets and examination of other on-site surface flow channels and swales, including the removal of any debris that blocks the flow path. Post-storm activities will include inspection of the grate inlets, looking for any ponded water on the site

and determining the cause, and looking for surface erosion. The Construction Contractor shall implement corrective actions specified by the California Construction Authority Inspector, as necessary.

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***On Site Stationary Source Noise Impacts***

The arena and amphitheater are two potential onsite noise sources. The arena is sufficiently buffered from sensitive receptors by distance and traffic noise from SR-55. The proposed relocation of the arena would have a negligible noise attenuation effect.

Noise levels associated with non-fair concert events in the amphitheater may be significant. Use of the amphitheater for non-fair concert events warrants implementation of Mitigation Measure 8-2.

***Mitigation Measure 8-2***

~~Should the 32<sup>nd</sup> DAA Board of Directors decide to use the amphitheater for non-fair concert events, Prior to operation of the amphitheater as described in the Master Plan (including removal of the berm), the 32nd DAA shall implement all or any combination of the following mitigation noise control measures may need to be applied to meet the requirements of the 1990 Order:~~

- Partial walls;
- Partial enclosure (walls and a portion of a roof);
- Full enclosure; and
- Noise control and monitoring at the source.

If partial enclosure is considered, the opening of the enclosure will be designed so that it is not open to the direction of any noise sensitive land uses. In addition, sound absorptive material or finish is to be used on the interior surface of the partial enclosure to reduce the potential of noise leaking out of the enclosure.

Implementation of mitigation measure 8-2 will reduce noise impacts from non-fair amphitheater use to below a level of significance.

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Any potential impacts to public services and utilities are reduced to below significance with implementation of the following mitigation measures.

***Mitigation Measure 10-2***

***Automatic Sprinkler System.***

- A. All structures over 6,000 square feet shall be protected by an automatic sprinkler system, in a manner meeting the approval of the Deputy State Fire Marshal.
- B. Prior to construction, the California Construction Authority shall submit and obtain approval of plans for any required automatic fire sprinkler system in any structure to the Office of the State Fire Marshal



for review and approval.

- C. Prior to building occupancy, this system shall be operational in a manner meeting the approval of the Deputy State Fire Marshal.

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Implementation of the proposed Master Plan will require truck trips for hauling excavated earth material and earth material presently contained in the berm near the amphitheater. Mitigation Measure 12-1 will reduce the short-term construction impacts related to traffic to below a level of significance.

***Mitigation Measure 12-1***

Prior to commencement of construction, the California Construction Authority will coordinate with the City of Costa Mesa regarding haul routes and postproject street maintenance specifically pertaining to ~~removing~~ removal of materials from the project during grading and construction periods.

With implementation of Mitigation Measure 12-1, any traffic impacts from trucks hauling earth material from the project site will be less than significant.

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*These changes to the Draft EIR are refinements to the text for consistency with other changes in the EIR Errata, and have no material effect on the analysis or findings of the EIR other than as discussed elsewhere in the EIR Errata.*

## 2.0 INTRODUCTION

### 2.1 NOTICE OF PREPARATION AND PUBLIC SCOPING MEETING

[DEIR PAGE 2-2]

The majority of the oral comments received at the scoping meeting expressed opinions about project design or were questions about the administration of the CEQA process, rather than the potential environmental effects of the project as defined by CEQA. For purposes of the EIR analysis, those comments are not included in this EIR but are included in the transcript of the scoping meeting and have become part of the 32nd DAA administrative record for this project and are hereby incorporated by reference.

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

#### 2.1.2 Site Plan Modifications [DEIR page 2-4]

After comments on the NOP were received by the 32nd DAA, there were some modifications made to the conceptual site plan in order to address issues raised by the public. Therefore, the conceptual plan shown in this EIR (Figure 3.2.1) is slightly different from the plan described in the NOP materials. The modifications are within the physical envelope of development stated in the NOP, and the overall square footage of the proposed project remains the same. Therefore, there was no need to recirculate the NOP.

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

### 2.3 PROJECT APPROVALS AND INTENDED USES OF THIS EIR

[DEIR page 2-7]

This EIR shall be used by the 32nd DAA to determine any potential environmental effects of the proposed project. The information and conclusions contained herein shall be considered as the 32nd DAA reviews the project. Implementation of the proposed project requires the following discretionary approvals by the 32nd DAA:

- Certification of the Environmental Impact Report (32nd DAA Board of Directors);
- Adoption of a Mitigation Monitoring Plan (32nd DAA Board of Directors);
- Approval and adoption of the Master Plan, including land use guidelines, a conceptual site plan, a business plan, and an implementation strategy (32nd DAA Board of Directors); ~~and~~

Development of the project will require approvals and permits from the City of Costa Mesa for improvements to the storm drain on Arlington Drive and for an additional point of entry/exit. For this reason the Lead Agency has determined that the City of Costa Mesa is a Responsible Agency under CEQA. Other Responsible Agencies that have permitting authority for some aspect of the project have been identified in Table 2.A.

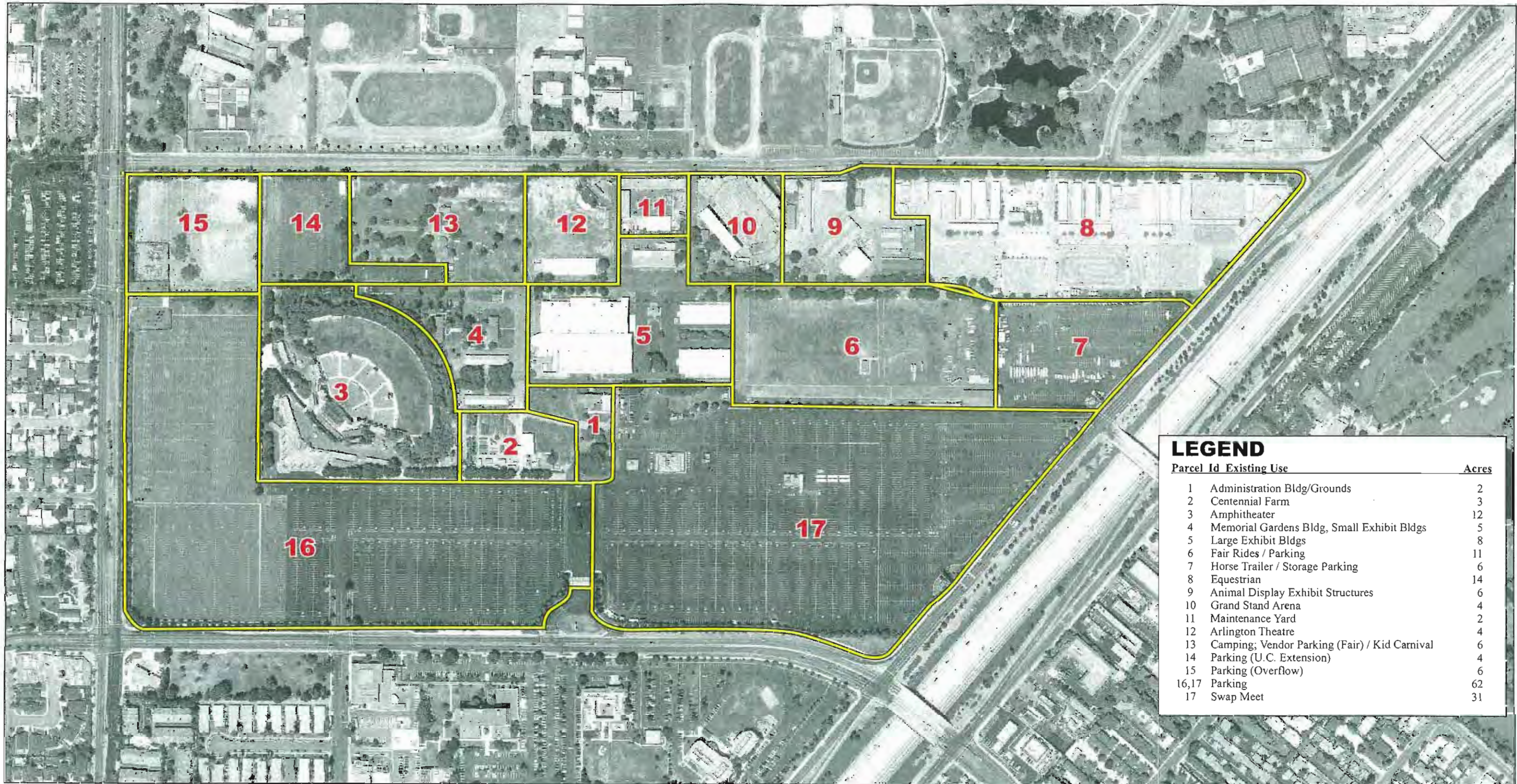
*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

### **3.0 PROJECT DESCRIPTION**

*In response to comments received, several clarifications were made to the Project Description. These changes and clarifications relate to existing and proposed building square footages. These changes are included in the FEIR Errata and are further detailed in the Response to Comments and the Response to Comments Attachment A. These changes do not result in an increase in severity of a significant impact or in an impact not previously identified in the DEIR. Therefore, recirculation of a subsequent EIR is not required per section 15088.5(a) of the CEQA Guidelines.*

#### **FIGURE 3.1.2** **[DEIR page 3-4]**

*Figure 3.1.2, Fairgrounds Complex Use Areas, has been amended so that use area 8 is labeled. This change to the DEIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*



LEGEND		
Parcel Id	Existing Use	Acres
1	Administration Bldg/Grounds	2
2	Centennial Farm	3
3	Amphitheater	12
4	Memorial Gardens Bldg, Small Exhibit Bldgs	5
5	Large Exhibit Bldgs	8
6	Fair Rides / Parking	11
7	Horse Trailer / Storage Parking	6
8	Equestrian	14
9	Animal Display Exhibit Structures	6
10	Grand Stand Arena	4
11	Maintenance Yard	2
12	Arlington Theatre	4
13	Camping, Vendor Parking (Fair) / Kid Carnival	6
14	Parking (U.C. Extension)	4
15	Parking (Overflow)	6
16,17	Parking	62
17	Swap Meet	31

LSA



Scale in Feet  
 0 300 600

SOURCE: HJW June, 1999-

I:\Cez030\G\Fairgrounds Complex.cdr (7/30/03)

FIGURE 3.1.2

Orange County Fair and Exposition Center  
 Fairgrounds Complex Use Areas

**Table 3.1.A: Existing Facilities [DEIR page 3-5]**

	<b>Existing</b>
Amphitheater	351,560 (18,500 seats)
Tickets/Concessions	<u>135,200</u>
Centennial Farms	168,000
Festival Grounds/Camping <sup>1</sup>	306,250
Carnival Lot <sup>2</sup>	318,150
Exhibit & Administration Buildings	<del>167,986</del> <u>174,921</u>
<u>Kitchen</u>	<u>5,633</u>
Silo	2,730
Barn	5,190
Plazas/Courts	71,875
Central Park	0
Storage	11,130
Yard	28,050
Livestock Area	97,200
Arena	110,136
Equestrian Center	500,940
Little Theater	5,960
Judging Ring	0
Memorial Gardens	3,411
Arlington Theater	97,344
<b>TOTAL</b>	<del>1,927,762</del> <u>2,403,990</u>

All numbers are in square feet unless otherwise noted.

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR. The increase in square footage for exhibit and administration buildings is the result of inclusion of Building 33 and the Public Safety Building.*

<sup>1</sup> Festival Grounds (excludes area for parking)

<sup>2</sup> Carnival Lot (includes area for non-Fair parking)

**FIGURE 3.1.3**  
**[DEIR page 3-6]**

*Figure 3.1.3, Surrounding Land Uses, has been amended to show the residential area west of Fairview as single-family residential. This change to the DEIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

**3.2 PROJECT CHARACTERISTICS**  
**[DEIR page 3-7]**

**The Park Area.** The Park, the western portion of the core of facilities, will include a remodeled amphitheater that will have reduced capacity (from 18,500 to 8,500 people). Once in operation, amphitheater events will not be scheduled to begin earlier than 7:30 p.m. on a weekday or within one hour of the commencement or completion of a significant Interim Event (i.e., an event or combination of events with a forecasted attendance of 10,000 persons or more). The first phase in remodeling the amphitheater will be to remove a large earthen berm that is used for seating up to 10,000 people. This berm contains approximately 200,000 cubic yards of earthen material. The amphitheater will be reopened with a maximum capacity of 8,500. East and north of the amphitheater will be a large, passive park area. The Park will be characterized by an open landscape area with drifts of shade trees. The adjacent areas to the south and west of the refurbished amphitheater currently occupied by box office structures and hard surface plaza will be replaced by a grove of citrus trees. The midway (carnival lot) will be relocated north of this park area to an area referred to as the Festival Grounds. Centennial Farms, a working farm exhibit, will be expanded to the west, incorporating an area that is currently occupied by a portion of the earthen berm.

*This change to the Draft EIR text is verification of an assumption made elsewhere in the Draft EIR text and has no material effect on the analysis or findings of the EIR.*



LSA



Scale in Feet  
 0 300 600

SOURCE: Fuscoe Engineering

I:\Cez030\G\Surrounding Land Uses 2.cdr (7/30/03)

FIGURE 3.1.3

Orange County Fair and Exposition Center  
 Surrounding Land Uses



L S A



SOURCE: EAGLE AERIAL.

I:\CCZ030\GView Sims\Vantage Point Locations.cdr (7/31/03)

FIGURE 4.1.1

Orange County Fair and Exposition Center  
Location View Map





Existing View.



View Simulation.

LSA

FIGURE 4.1.4

Orange County Fair and Exposition Center  
View C Simulation

## 4.2 AIR QUALITY

Table 4.2.A: Ambient Air Quality Standards [DEIR page 4.2-2]

Pollutant	Averaging Time	California Standards <sup>1</sup>		Federal Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>2,5</sup>	Secondary <sup>2,6</sup>	Method <sup>7</sup>
Ozone (O <sub>3</sub> )	1-Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	0.12 ppm (235 µg/m <sup>3</sup> ) <sup>8</sup>	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	=		0.08 ppm (157 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> )	24-Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation*	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup> *		50 µg/m <sup>3</sup>		
Fine Particulate Matter (PM <sub>2.5</sub> )	24-Hour	No Separate State Standard		65 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup> *	Gravimetric or Beta Attenuation*	15 µg/m <sup>3</sup>		
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m <sup>3</sup> )	Nondispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m <sup>3</sup> )	None	Nondispersive Infrared Photometry (NDIR)
	1-Hour	20 ppm (23 mg/m <sup>3</sup> )		35 ppm (40 mg/m <sup>3</sup> )		
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		=		
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Arithmetic Mean	=	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	Gas Phase Chemiluminescence
	1-Hour	0.25 ppm (470 µg/m <sup>3</sup> )		=		
Lead	30-day average	1.5 µg/m <sup>3</sup>	Atomic Absorption	=	=	High Volume Sampler and Atomic Absorption
	Calendar Quarter	=		1.5 µg/m <sup>3</sup>	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> )	Annual Arithmetic Mean	=	Ultraviolet Fluorescence	0.030 ppm (80 µg/m <sup>3</sup> )	=	Spectrophotometry (Pararosaniline Method)
	24-Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (365 µg/m <sup>3</sup> )	=	
	3-Hour	=		=	0.5 ppm (1300 µg/m <sup>3</sup> )	
	1-Hour	0.25 ppm (655 µg/m <sup>3</sup> )		=	=	
Visibility Reducing Particles	8-Hour	Extinction coefficient of 0.23 per kilometer - visibility of ten miles or more (0.07-30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates	24-Hour	25 µg/m <sup>3</sup>	Ion Chromatography*	No Federal Standards		
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>9</sup>	24-Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

Source: CARB (March 2003).

Footnotes:

- <sup>1</sup> California standards for ozone; carbon monoxide (except Lake Tahoe); sulfur dioxide (1 and 24 hour); nitrogen dioxide; suspended particulate matter, PM<sub>10</sub>; and visibility reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- <sup>2</sup> National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when 99 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. For PM<sub>2.5</sub>, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.
- <sup>3</sup> Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr: ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- <sup>4</sup> Any equivalent procedure that can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- <sup>5</sup> National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- <sup>6</sup> National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- <sup>7</sup> Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.
- <sup>8</sup> New federal eight-hour ozone and fine particulate matter standards were promulgated by U.S. EPA on July 18, 1997. Contact U.S. EPA for further clarification and current federal policies.
- <sup>9</sup> The ARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Pollutant	Averaging Time	STATE	FEDERAL	
		Concentration	Primary	Secondary
Ozone (O <sub>3</sub> )	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	0.12 ppm (235 µg/m <sup>3</sup> )	Same as Primary Std.
	8 Hour	-	0.08 ppm	
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Average	-	0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Std.
	1 Hour	0.25 ppm (470 µg/m <sup>3</sup> )	-	
Carbon Monoxide (CO)	8 Hour	9 ppm (10 mg/m <sup>3</sup> )	9 ppm (10 mg/m <sup>3</sup> )	-
	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	35 ppm (40 mg/m <sup>3</sup> )	-
Suspended Coarse Particulate Matter (PM <sub>10</sub> )	Annual Geometric Mean	30 µg/m <sup>3</sup>	-	-
	24 Hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	Same as Primary Std.
	Annual Arithmetic Mean	-	50 µg/m <sup>3</sup>	
Suspended Fine Particulate Matter (PM <sub>2.5</sub> )	24 Hour	-	65 µg/m <sup>3</sup>	-
	Annual Arithmetic Mean	-	15 µg/m <sup>3</sup>	-

Sulfur Dioxide (SO <sub>2</sub> )	Annual Average	-	80 µg/m <sup>3</sup> (0.03 ppm)	-
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )	365 µg/m <sup>3</sup> (0.14 ppm)	-
	3 Hour	-	-	1,300 µg/m <sup>3</sup> (0.5 ppm)
	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	-	-
Lead	30-Day Average	1.5 µg/m <sup>3</sup>	-	-
	Calendar Quarter	-	1.5 µg/m <sup>3</sup>	Same as Primary Std.
Sulfates	24 Hour	25 µg/m <sup>3</sup>	-	-
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	-	-
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm (26 µg/m <sup>3</sup> )	-	-
Visibility Reducing Particles	8 Hour (10 a.m.-6 p.m. PST)	±	-	-

Source: California Air Resources Board (ARB) 2001.

Notes: ppm = parts per million

mg/m<sup>3</sup> = milligrams per cubic meter

µg/m<sup>3</sup> = micrograms per cubic meter

\* In sufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particles when the relative humidity is less than 70 percent. Measurement in accordance with ARB Method V.

*This change to the Draft EIR is a refinement of the text so that it reflects recent changes in the standards and their descriptions. This change has no material effect on the analysis or findings of the EIR.*

## Regulatory Settings Regional Air Quality Management Plan

### [DEIR page 4.2-12]

The SCAQMD governing board approved the 1997 AQMP on November 15, 1996. After approval, the AQMP was submitted to the ARB for its review and approval. ARB approved the ozone and PM<sub>10</sub> portions of the 1997 AQMP on January 23, 1997, and submitted the plan to the EPA as proposed revisions to the SIP. The EPA rejected the District's revision of its 1997 AQMP in January 1999. The rejection, however, covers only the provisions of the AQMP designed to attain the federal ozone standard. Separate parts of the 1997 AQMP relating to carbon monoxide and nitrogen dioxide have previously been approved, and the EPA has yet to act on that portion of the 1997 AQMP related to fine particulate (PM<sub>10</sub>). As a result of the rejection, SCAQMD prepared a draft "Proposed 1999 Amendment to the 1997 Ozone SIP Revision for the South Coast Air Basin" on October 7, 1999, for public review and comment. The 1999 Amendment proposed to revise the ozone portion of the 1997 AQMP that was submitted to the EPA as a revision to the Basin portion of the 1994 California Ozone SIP. The SCAQMD governing board adopted the "1999 Amendment to the 1997 Ozone SIP Revision for the South Coast Air Basin" on December 10, 1999. The EPA approved the 1999 Amendment for

ozone in 2001, and currently there is no approved SIP for CO and PM<sub>10</sub>. In addition, the SCAQMD governing board settled with three environmental organizations on its litigation of the 1994 Ozone SIP.

The SCAQMD has completed a draft version of the 2003 AQMP and has been holding public workshops to solicit public comments on the document.

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

**[DEIR page 4.2-17]**

**Fugitive Dust.** Fugitive dust emissions are generally associated with grading, land clearing, exposure, vehicle and equipment travel on unpaved roads, and dirt/debris pushing. Dust generated during construction activities would vary substantially, depending on the level of activity, the specific operations, and weather conditions. Nearby sensitive receptors and workers may be exposed to blowing dust, depending upon prevailing wind conditions.

Building construction uses different types of equipment on the project site than during the grading period. Similarities do exist in terms of equipment exhaust emissions and fugitive dust emissions. However, it is anticipated that emissions during building construction would be below peak grading day emissions. Therefore, implementation of the mitigation measures specified below for the peak grading day emissions would be adequate to reduce emissions during other construction periods.

PM<sub>10</sub> emissions from berm removal and grading operations during a peak construction day are based on various schedules. The SCAQMD estimates that each acre of graded surface creates about 26.4 pounds of PM<sub>10</sub> per workday during the construction phase of the project and 21.8 pounds of PM<sub>10</sub> per hour from dirt/debris pushing per dozer. Based on the material handling, loaders traveling on haul road, vehicle travel on unpaved surfaces, and wind erosion of disturbed areas, the uncontrolled PM<sub>10</sub> emissions would be 334 pounds per day for the 30-day schedule. This level of dust emission would exceed the SCAQMD threshold of 150 pounds per day during construction. Table 4.2.F lists fugitive dust emissions and construction equipment exhausts for various construction schedules.

Prior to issuance of grading or equivalent permits (e.g., Notice to Proceed), the 32nd DAA Board of Directors and/or the California Construction Authority is required to include a dust control plan as part of the construction contract standard specifications, per AQMD rules. The dust control plan will specify measures to be implemented during grading activities, consistent with SCAQMD Rules 402 and 403. Rule 402 requires that there be no dust impacts off site sufficient to cause a nuisance, and Rule 403 restricts visible dust emissions from construction. The SCAQMD Rules 402 and 403 fugitive dust control techniques are further summarized below. Implementation of these dust suppression techniques as required by the SCAQMD can reduce the fugitive dust generation (and thus the PM<sub>10</sub> component) by 50 to 75 percent. Compliance with the following rules (these measures will be noted on the grading plan cover sheet) would reduce impacts on nearby sensitive receptors and reduce PM<sub>10</sub> in the air basin:

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

**[DEIR page 4.2-18]**

With implementation of SCAQMD Rules 402 and 403 requirements, fugitive dust emissions resulting from construction activities are expected to be reduced to 167 pounds or less per day, with 50 percent effectiveness. Combined with the 50 pounds per day generated by equipment exhaust and vehicle travel, the total mitigated dust emission of 217 pounds per day would remain higher than the SCAQMD threshold of 150 pounds per day. Therefore, specific mitigation and monitoring are recommended to control dust (see Mitigation Measures 2-2, 2-3, and 2-4).

Implementation of Mitigation Measures 2-1 ~~and through~~ 2-5 and compliance with SCAQMD Rules 402 and 403 will reduce short-term construction emissions resulting from construction equipment, fugitive dust, and architectural coatings; however, the resulting impacts would remain significant and are considered unavoidable significant impacts.

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

**[DEIR page 4.2-19]**

**Mitigation Measure 2-3**

In order to reduce fugitive dust from on-site and off-site vehicle activity, the following measures shall be implemented by the applicant and the contractor during the period of construction:

The California Construction Authority shall verify that the following provisions are included in the grading contractor's contract prior to issuance of the Notice to Proceed:

1. All trucks hauling, dirt, sand, soil, or other loose materials are to be covered, or shall maintain at least two feet of freeboard in accordance with the requirements of California Vehicle Code section 23114 ("freeboard" means vertical space between the top of the load and top of the trailer); covering shall be tightly secured to truck.
2. Sweep adjacent streets once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water). Sweep streets immediately after period of heaviest vehicular track-out activity.
3. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. Set up truck washing area on paved access road area so subsequent truck travel on unpaved roads can be eliminated.
4. Pave or provide gravel roadbed on all on-site construction access roads at least 100 feet onto the site from main road.

5. Apply water three times daily, or apply non-toxic soil stabilizers, according to manufacturers' specifications, to all inactive construction areas (previously graded areas inactive for 10 days or more).
6. Traffic speeds on all unpaved roads shall be reduced to 15 mph or less; effective traffic control or signage shall be installed and maintained.
- ~~7. Daily and weekly monitoring reports by the monitor, acceptable to the 32nd DAA Board of Directors and the California Construction Authority, shall be submitted to the California Construction Authority Project Manager, by the contractor.~~

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR. Removal of this text eliminates a redundancy between Mitigation Measure 2-3 and Mitigation Measure 2-4.*

#### **4.4 CULTURAL RESOURCES [DEIR page 4.4-6]**

##### **Mitigation Measure 4-1**

Prior to issuance of the Notice to Proceed, the California Construction Authority shall verify that a County of Orange certified paleontologist has been retained to observe grading activities and salvage and catalogue fossils as necessary. The paleontologist shall be present at the pregrading conference, shall establish procedures for paleontological resource surveillance, and shall establish, in cooperation with the OCFEC and the California Construction Authority, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the fossils. If major paleontological resources are discovered, the paleontologist shall determine appropriate actions, in cooperation with the project developer, to ensure proper exploration and/or salvage. Excavated finds shall be prepared to the point of identification and offered to the County of Orange, or ~~it's a~~ designee within the County of Orange, on a first refusal basis. If any paleontological resources are found, the paleontologist shall submit a follow-up report which shall include the period of inspection, a catalogue and analysis of the fossils found, and present repository of the fossils to the ~~Orange County Natural History Museum~~ County of Orange or its designee. The 32nd DAA should be prepared to pay curation fees.

*This change to the Draft EIR is a refinement to a mitigation measure clarifying distribution and treatment of any cultural artifacts found during project implementation. This refinement has no material effect on the analysis or findings of the EIR.*

**Mitigation Measure 4-2**

Prior to issuance of the Notice to Proceed, the California Construction Authority shall verify that a County of Orange certified archaeologist has been retained, shall be present at the pregrading conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the OCFEC and the California Construction Authority, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the artifacts as appropriate. If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the OCFEC and the California Construction Authority, for exploration and/or salvage. The archaeologist shall submit a follow-up report to the Orange County Natural History Museum County of Orange or a designee within the County of Orange which shall include the period of inspection, a catalogue and analysis of any artifacts found, and present repository of the artifacts. Excavated finds shall be offered to the County of Orange, or designee, on a first refusal basis. The 32nd DAA should be prepared to pay curation fees.

*This change to the Draft EIR is a refinement to a mitigation measure that further clarifies distribution and treatment of any cultural artifacts found during project implementation. This refinement has no material effect on the analysis or findings of the EIR.*

**Mitigation Measure 4-3**

The California Construction Authority shall verify that the following provision is included in the grading contractor's contract prior to issuance of the Notice to Proceed. If human remains are encountered during the course of construction, project-related activities in the immediate vicinity of the find will be temporarily diverted. The County Coroner will be contacted within 24 hours. The County Coroner will determine whether the remains are recent. If the remains are determined to be Native American in origin, the Native American Heritage Commission will be contacted immediately to determine the most likely descendant (MLD). The MLD will have the opportunity to become involved with the final disposition of the remains following scientific analysis.

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*



## 4.5 EARTH RESOURCES/TOPOGRAPHY

### 4.5.5 IMPACTS AND MITIGATION MEASURES

#### Landform Modifications [DEIR page 4.5-8]

Project site construction will require grading and earthmoving to prepare the site for redevelopment. Earthwork will require topographical modifications, including the removal of a large earthen berm. It should be noted that this berm was created for a seating area less than ten years ago. Approximately 200,000 cubic yards of material will be removed in conjunction with demolition activities. Minor earthmoving activities will also be needed to implement construction projects called for in the Master Plan. There are no unique geologic features on or adjacent to the project site that would be significantly reduced or eliminated by the proposed development. The grading and earthmoving required for implementation of the proposed project will alter only previous modified land; therefore, the effects of the proposed project on landform and topography are considered to be less than significant (Criterion 5-~~H8~~).

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

#### Landslides, Soil, and Seismic Hazards [DEIR page 4.5-8]

The project site is flat without any slopes or hillsides to otherwise create landslide or mudslide conditions. There are no hillsides in the immediate vicinity of property and no likelihood of exposure of people or property to geological hazards, such as slides or ground failure, that could not be rectified by implementing standard design measures and/or construction and maintenance practices (Criteria 5-A~~4~~ and 5-~~B2~~).

The site is subject to ground shaking from earthquakes, as is the entire Southern California region. Ground shaking may cause property damage and personal injury ranging from slight to severe, depending on the magnitude and motion of movement of the individual earthquake and any associated ~~dition~~ aftershocks. The project site is not located in an Alquist Priolo Earthquake Fault Zone or within a known active fault zone or an area characterized by surface rupture that might be related to a fault. The nearest fault is approximately three miles southwest of the project site. The project site has not been subject to ground rupture in its history nor would it likely be subject to ground rupture from seismic events in the future (Criteria 5-~~E5~~ and 5-~~F6~~).

Liquefaction occurs when ground shaking and high groundwater cause loose, sandy soil to behave like quicksand rather than a solid material. Subsequently, these soils cannot support weight, which can result in the collapse or displacement of building foundations. Due to the absence of a shallow water table (i.e., groundwater depth is more than 20 feet below the surface) and the moderately high density of soil materials beneath the site, the risk of liquefaction is considered negligible (Criterion 5-~~E5~~).

The extremely thick alluvial deposits that underlie the area are subject to differential settlement during intense shaking associated with seismic events. This type of seismic hazard results in damage

to property when an area settles to different degrees over a relatively short distance. The actual potential for settlement is, however, difficult to predict. In the history of the Fairgrounds, no record or indication of differential settlement has been noted (Criterion 5-G7).

Strong ground shaking from seismic events (earthquake) could cause soil settlement by allowing settlement particulate to become more tightly packed, reducing pore space. Poorly compacted (unconsolidated) surficial deposits and artificial fills may experience seismically induced settlement. Expansive soils are present on the site, and structural damage, such as cracking, heaving, and buckling of foundations, could occur if soils are not properly prepared during construction.

Expansive and unconsolidated soils represent a potentially significant impact prior to mitigation. Mitigation Measure 5-1 will reduce this potential impact to a less than significant level. Standard erosion control practices will be required of the project contractor during construction. Implementation of these measures will ensure that Criteria 5-C3, 5-D4, and 5-G7 would not be exceeded.

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

#### **4.7 LAND USE**

##### **FIGURE 4.7.1, SURROUNDING LAND USES [DEIR, Page 4.7-2]**

*This change to the Draft EIR are refinements to the text for consistency with other changes in the EIR errata, and have no material effect on the analysis or findings of the EIR other than as discussed elsewhere in the EIR errata.*

##### **Existing General Plan Designations and Zoning Designations [DEIR page 4.7-1]**

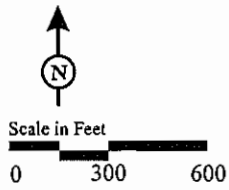
The 32nd DAA and the State of California are responsible for the type and intensity of land uses on the OCFEC. Although the OCFEC is exempt from municipal land use policies by virtue of it being owned by the State of California, the City of Costa Mesa's General Plan addresses the proposed project area.

Land use and zoning classifications establish land use intensity limits to ensure a balance of land uses throughout a given community. The land use designation for the proposed project site is "Fairgrounds" in recognition of the unique land uses associated with this 150-acre site. Although the City of Costa Mesa's General Plan recognizes that the City has limited land use control and permitting authority with regard to the OCFEC, the document establishes the maximum allowable floor area ratio (FAR) for the land use designation "Fairgrounds" to be 0.10. FAR is used to express the relationship between the allowable gross floor area of a building (or buildings) and the lot on which the building (or buildings) stand(s). Table 4.7.A provides the existing FAR for the OCFEC.

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LSA



SOURCE: Fuscoe Engineering

I:\Cez030\G\Surrounding Land Uses 4.7.1.cdr (7/30/03)

FIGURE 4.7.1

Orange County Fair and Exposition Center  
Surrounding Land Uses

**Table 4.7.A: Existing FAR**

<u>Existing Building SF</u>	<u>Gross Acres</u>	<u>FAR</u>
451,685 SF	147 AC (6,403,320 SF)	0.07

Note: Existing building square footage includes roofed structures enclosed on all sides by walls.

*In response to comments received, clarification of the floor area ratio (FAR) for the project site has been provided. This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

#### 4.7.4 IMPACTS AND MITIGATION MEASURES

##### Land Use Compatibility [DEIR page 4.7-7]

The project area has been used as a Fairgrounds for over 50 years. When the Fairgrounds was initially established on the project site, no other developed land uses existed nearby, with the exception of the Santa Ana County Club. Potential and actual land use incompatibility issues arose once the surrounding properties were developed with the aforementioned uses. The primary impacts of the proposed project on surrounding land uses will occur during the construction phase. The proposed project may have potentially adverse impacts involving noise, air quality, and traffic on adjacent residential land uses. These impacts, as well as feasible mitigation measures, are discussed in detail in the applicable sections of Chapter 4: Section 4.8, Noise; Section 4.2, Air Quality; and Section 4.12; Traffic and Circulation. These impacts are summarized below.

**Noise.** Noise generated by the project includes construction related noise, off-site noise associated with increased traffic, on-site noise from stationary sources such as air conditioning units, mobile sources such as truck deliveries and trash pickups, and noise from periodic uses such as Fair rides and amphitheater entertainment. Mitigation measures will be required in accordance with the ~~County of Orange's Noise Ordinance 1990 Order~~ to reduce noise impacts to below a level of significance.

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

##### [DEIR page 4.7-8]

As previously mentioned, the City of Costa Mesa has only limited permitting authority for projects occurring at the OCFEC. Although the 32nd DAA has planning and development authority over the OCFEC, the City of Costa Mesa's General Plan does provide both a land use designation and development standards for the project site. According to the General Plan, the land use designation "Fairgrounds" recognizes the unique land uses associated with the site. Table 4.7.B provides the FAR for the OCFEC after Master Plan implementation. The table provides the FAR for the OCFEC under two Master Plan implementation scenarios. The first assumes the Amphitheater remains uncovered

giving the OCFEC an FAR of 0.08. The second scenario assumes that the Amphitheater is covered, giving the OCFEC an FAR of 0.11—1 percent more than the FAR stipulated in the City of Costa Mesa General Plan.

**Table 4.7.B: Master Plan FAR**

	<u>Building SF</u>	<u>Gross Acres</u>	<u>FAR</u>
<u>Master Plan</u>	<u>480,077 SF</u>	<u>147 AC (6,403,320 SF)</u>	<u>0.08</u>
<u>Master Plan (with enclosed Amphitheater)</u>	<u>734,477 SF</u>	<u>147 AC (6,403,320 SF)</u>	<u>0.11</u>

Note: Building square footage includes roofed structures enclosed on all sides by walls.

*In response to comments received, clarification of the floor area ratio (FAR) for the project site has been provided. This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*

#### 4.8 NOISE

[DEIR page 4.8-27]

##### Mitigation Measure 8-2

~~Should the 32<sup>nd</sup> DAA Board of Directors decide to use the amphitheater for nonfair concert events, Prior to operation of the amphitheater as described in the Master Plan (including removal of the berm), the 32<sup>nd</sup> DAA shall implement all or any combination of the following mitigation noise control measures may need to be applied to meet the requirements of the 1990 Order:~~

- Partial walls;
- Partial enclosure (walls and a portion of a roof);
- Full enclosure; and
- Noise control and monitoring at the source.

If partial enclosure is considered, the opening of the enclosure will be designed so that it is not open to the direction of any noise sensitive land uses. In addition, sound absorptive material or finish is to be used on the interior surface of the partial enclosure to reduce the potential of noise leaking out of the enclosure.

*This change to the Draft EIR is a refinement of or clarification to a Mitigation Measure and has no material effect on the analysis or findings of the EIR.*

## 4.11 RECREATION

### Public Trails [DEIR page 4.11-3]

Public trails are also available within the City limits for recreation. These trails are connected to a countywide network of trails. The County of Orange has a regional network of 348 miles of existing and proposed riding and hiking trails. These trails are designed to meet the needs of equestrians, pedestrians (walkers, hikers, and joggers), and non-motorized bikers. The Orange County General Plan adopted a series of goals, objectives, and policies aimed at directing the development and operation of the countywide public network of trails based on the Master Plan of Regional Riding and Hiking Trails (MPRRHT). On-road and paved off-road bikeways are addressed in the Orange County Transportation Authority's Strategic Plan for Regional Bikeways.

~~Per the MPRRHT and the Orange County Transportation Authority Bikeway Strategic Plan, a Class I bikeway exists along half of the south side and all of the east side of the Fairgrounds. Class II bikeways exist along the north, west, and south sides of the Fairgrounds. Figure 4.11.2 depicts the bike trails surrounding the Fairgrounds. The MPRRHT and other County documents prepared by the Riding and Hiking Trails Advisory Committee related to riding and hiking trails propose more direct trail linkages to the Fairgrounds.~~

At this time, the Fairgrounds is designated on the MPRRHT as the start/end point (staging area) for the Santa Ana Heights Trail. Originally it was envisioned that this trail would extend from the Upper Newport Bay Ecological Preserve to the Fairgrounds and would allow trail users to reach the extensive trail and bikeway network in the Back Bay area. At this time, the existing trail terminates approximately one mile east of the Fairgrounds. Though approved, the trail has not been extended westerly along the Delhi Channel ~~due to lack of funding~~. At this time, there is no known date of construction for this portion of the trail. The County of Orange has recently contacted the Santa Ana Country Club to discuss the possibility of extending the trail from the Delhi Channel through the Santa Ana Country Club golf course; however, no agreement has been reached at the time of this report's preparation.

*These changes to the Draft EIR are refinements to the text and have no material effect on the analysis or findings of the EIR.*

#### 4.12 TRAFFIC AND CIRCULATION

*In the response to comments, several clarifications were made to the Traffic Impact Analysis (LSA 2002), which is contained in Appendix G, Volume 5 of the EIR. Because much of Section 4.12 (Traffic and Circulation) of the DEIR summarizes or directly quotes from the Traffic Impact Analysis, Section 4.12 of the EIR has been revised to reflect the changes. Changes to both the Traffic Impact Analysis and Section 4.12 of the EIR have been included in this Errata.*

*These changes to the Draft EIR do not result in a significant impact and, as a result, have no material effect on the findings of the EIR. Recirculation of a subsequent EIR is not required per Section 15088.5(a) of the CEQA Guidelines.*

**Table 4.12.B: Existing Typical Weekend Daily Roadway Traffic Volumes [DEIR page 4.12-8]**

	Street	Segment	Volume	Capacity	V/C
1	Fair Drive	Harbor to Fairview	10,032	38,000	0.26
2	Fair Drive	Fairview to Vanguard	18,583	38,000	0.49
3	Fair Drive	Vanguard to Newport Blvd	22,007	38,000	0.58
4	Del Mar Avenue	Newport Blvd to Orange	10,060	38,000	0.26
5	Del Mar Avenue	Orange to Santa Ana	6,197	38,000	0.16
6	Fairview Road	I-405 to Baker	39,775	56,000	0.71
7	Fairview Road	Baker to Adams	41,854	56,000	0.75
8	Fairview Road	Adams to Arlington	27,503	56,000	0.49
9	Fairview Road	Arlington to Fair	25,890	56,000	0.46
10	Fairview Road	Fair to Wilson	12,697	56,000	0.23
11	Fairview Road	Wilson to Newport	9,937	56,000	0.18
12	Newport Boulevard (North)	Bristol to Mesa	6,632	N/A*	N/A*
13	Newport Boulevard (North)	Mesa to Fair	5,523	N/A*	N/A*
14	Newport Boulevard (North)	Fair to Vanguard	11,557	N/A*	N/A*
15	Newport Boulevard (North)	Vanguard to Fairview	9,990	N/A*	N/A*
16	Newport Boulevard (South)	Bristol to Mesa	25,927	N/A*	N/A*
17	Newport Boulevard (South)	Mesa to Fair	22,575	N/A*	N/A*
18	Newport Boulevard (South)	Fair to Vanguard	9,385	N/A*	N/A*
19	Newport Boulevard (South)	Vanguard to Fairview	7,538	N/A*	N/A*
20	Harbor Boulevard	Wilson to Fair	43,751	68,000	0.64
21	Harbor Boulevard	Fair to Adams	43,028	68,000	0.63
22	Harbor Boulevard	Adams to Baker	49,230	9068,000	0.5572
23	Arlington Drive	Fairview to Newport Boulevard	5,655	12,500	0.45

\* This segment of roadway is a one-way couplet. Neither the City of Costa Mesa nor the County of Orange has an established standard for the capacity of a one-way couplet.

*These changes to the Draft EIR are refinements to the text and have no material effect on the analysis or findings of the EIR, other than as discussed elsewhere in the EIR Errata or the Final EIR.*



**Table 4.12.D: Existing Interim Event Daily Roadway Traffic Volumes [DEIR page 4.12-11]**

	Street	Segment	Volume	Capacity	V/C
1	Fair Drive	Harbor to Fairview	10,319	38,000	0.27
2	Fair Drive	Fairview to Vanguard	20,419	38,000	0.54
3	Fair Drive	Vanguard to Newport Blvd	22,789	38,000	0.60
4	Del Mar Avenue	Newport Blvd to Orange	9,221	38,000	0.24
5	Del Mar Avenue	Orange to Santa Ana	6,165	38,000	0.16
6	Fairview Road	I-405 to Baker	40,065	56,000	0.72
7	Fairview Road	Baker to Adams	40,696	56,000	0.73
8	Fairview Road	Adams to Arlington	30,125	56,000	0.54
9	Fairview Road	Arlington to Fair	26,770	56,000	0.48
10	Fairview Road	Fair to Wilson	12,473	56,000	0.22
11	Fairview Road	Wilson to Newport	10,009	56,000	0.18
12	Newport Boulevard (North)	Bristol to Mesa	6,834	N/A*	N/A*
13	Newport Boulevard (North)	Mesa to Fair	5,681	N/A*	N/A*
14	Newport Boulevard (North)	Fair to Vanguard	11,487	N/A*	N/A*
15	Newport Boulevard (North)	Vanguard to Fairview	10,173	N/A*	N/A*
16	Newport Boulevard (South)	Bristol to Mesa	27,986	N/A*	N/A*
17	Newport Boulevard (South)	Mesa to Fair	22,808	N/A*	N/A*
18	Newport Boulevard (South)	Fair to Vanguard	10,361	N/A*	N/A*
19	Newport Boulevard (South)	Vanguard to Fairview	7,973	N/A*	N/A*
20	Harbor Boulevard	Wilson to Fair	43,761	68,000	0.64
21	Harbor Boulevard	Fair to Adams	43,450	68,000	0.64
22	Harbor Boulevard	Adams to Baker	51,358	6890,000	0.576
23	Arlington Drive	Fairview to Newport Boulevard	5,655	12,500	0.45

\* This segment of the roadway is a one-way couplet. Neither the City of Costa Mesa nor the County of Orange has an established standard for the capacity of a one-way couplet.

*These changes to the Draft EIR are refinements to the text and have no material effect on the analysis or findings of the EIR, other than as discussed elsewhere in the EIR Errata or the Final EIR.*

**Table 4.12.H: Existing Interim Event Plus Master Plan Peak Hour Levels of Service [DEIR page 4.12-23]**

<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>	<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>
1. Harbor Blvd/Baker St	0.58	A	12. Fairview Rd/I-405 NB Ramp	0.81	D
2. Harbor Blvd/Adams Ave	0.78	C	13. Vanguard Way/Fair Dr	0.62	B
3. Harbor Blvd/Fair Drive	0.50	A	14. Fair Main Entrv/Fair Dr	0.48	A
4. Harbor Blvd/Wilson St	0.67	B	15. Newport Blvd (S)/Fair Dr	0.60	A
5. Harbor Blvd/Victoria St	0.71	C	16. Newport Blvd (N)/Del Mar Ave	0.76	C
6. Fairview Rd/Newport Blvd	0.66	B	17. Orange Ave/Del Mar Ave	0.42	A
7. Fairview Rd/Wilson St	0.56	A	18. Santa Ana Ave/Del Mar Ave	0.46	A
8. Fairview Rd/Fair Dr	0.73	C	19. Newport Blvd (S)/Mesa Dr	0.67	B
9. Fairview Rd/Adams Ave	0.65	B	20. Newport Blvd (N)/Mesa Dr	0.43	A
10. Fairview Rd/Baker St	0.59	A	21. Fairview Rd/Arlington Dr	0.55	A
11. Fairview Rd/I-405 SB Ramp	0.75	C			

<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>	<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>
<del>1. Harbor Blvd/Baker St</del>	<del>0.58</del>	<del>A</del>	<del>10. Fairview Rd/Baker St</del>	<del>0.57</del>	<del>A</del>
<del>2. Harbor Blvd/Adams Ave</del>	<del>0.78</del>	<del>C</del>	<del>11. Fairview Rd/I-405 SB Ramp</del>	<del>0.73</del>	<del>C</del>
<del>3. Harbor Blvd/Fair Drive</del>	<del>0.50</del>	<del>A</del>	<del>12. Fairview Rd/I-405 NB Ramp</del>	<del>0.77</del>	<del>C</del>
<del>4. Harbor Blvd/Wilson St</del>	<del>0.67</del>	<del>B</del>	<del>13. Vanguard Way/Fair Dr</del>	<del>0.58</del>	<del>A</del>
<del>5. Harbor Blvd/Victoria St</del>	<del>0.71</del>	<del>C</del>	<del>14. Fair Main Entry/Fair Dr</del>	<del>0.44</del>	<del>A</del>
<del>6. Fairview Rd/Newport Blvd</del>	<del>0.64</del>	<del>B</del>	<del>15. Newport Blvd (S)/Fair Dr</del>	<del>0.58</del>	<del>A</del>
<del>7. Fairview Rd/Wilson St</del>	<del>0.56</del>	<del>A</del>	<del>16. Newport Blvd (N)/Del Mar Ave</del>	<del>0.75</del>	<del>C</del>
<del>8. Fairview Rd/Fair Dr</del>	<del>0.67</del>	<del>B</del>	<del>17. Orange Ave/Del Mar Ave</del>	<del>10.3 sec.</del>	<del>B</del>
<del>9. Fairview Rd/Adams Ave</del>	<del>0.65</del>	<del>B</del>	<del>18. Santa Ana Ave/Del Mar Ave</del>	<del>11.2 sec.</del>	<del>B</del>

*These changes to the Draft EIR are refinements to the text and have no material effect on the analysis or findings of the EIR, other than as discussed elsewhere in the EIR Errata or the Final EIR.*

**Table 4.12.I: Interim Event Plus Master Plan Daily Traffic Volumes [DEIR page 4.12-24]**

	Street	Segment	Volume	Capacity	V/C
1	Fair Drive	Harbor to Fairview	10,446	38,000	0.27
2	Fair Drive	Fairview to Vanguard	21,211	38,000	0.56
3	Fair Drive	Vanguard to Newport Blvd	23,391	38,000	0.62
4	Del Mar Avenue	Newport Blvd to Orange	9,284	38,000	0.24
5	Del Mar Avenue	Orange to Santa Ana	6,228	38,000	0.16
6	Fairview Road	I-405 to Baker	41,396	56,000	0.74
7	Fairview Road	Baker to Adams	42,027	56,000	0.75
8	Fairview Road	Adams to Arlington	31,456	56,000	0.56
9	Fairview Road	Arlington to Fair	27,626	56,000	0.49
10	Fairview Road	Fair to Wilson	12,885	56,000	0.23
11	Fairview Road	Wilson to Newport	10,421	56,000	0.19
12	Newport Boulevard (North)	Bristol to Mesa	7,595	N/A*	N/A*
13	Newport Boulevard (North)	Mesa to Fair	6,442	N/A*	N/A*
14	Newport Boulevard (North)	Fair to Vanguard	11,487	N/A*	N/A*
15	Newport Boulevard (North)	Vanguard to Fairview	10,173	N/A*	N/A*
16	Newport Boulevard (South)	Bristol to Mesa	28,747	N/A*	N/A*
17	Newport Boulevard (South)	Mesa to Fair	23,885	N/A*	N/A*
18	Newport Boulevard (South)	Fair to Vanguard	10,361	N/A*	N/A*
19	Newport Boulevard (South)	Vanguard to Fairview	7,973	N/A*	N/A*
20	Harbor Boulevard	Wilson to Fair	43,824	68,000	0.64
21	Harbor Boulevard	Fair to Adams	43,577	68,000	0.64
22	Harbor Boulevard	Adams to Baker	51,421	90,000	0.76
23	Arlington Drive	Fairview to Newport Blvd	6,289	12,500	0.50

	Street	Segment	Volume	Capacity	V/C
1	Fair Drive	Harbor to Fairview	10,382	38,000	0.27
2	Fair Drive	Fairview to Vanguard	20,815	38,000	0.55
3	Fair Drive	Vanguard to Newport Blvd	23,090	38,000	0.61
4	Del Mar Avenue	Newport Blvd to Orange	9,253	38,000	0.24
5	Del Mar Avenue	Orange to Santa Ana	6,197	38,000	0.16
6	Fairview Road	I-405 to Baker	40,730	56,000	0.73
7	Fairview Road	Baker to Adams	41,361	56,000	0.74
8	Fairview Road	Adams to Arlington	30,790	56,000	0.55
9	Fairview Road	Arlington to Fair	27,198	56,000	0.49
10	Fairview Road	Fair to Wilson	12,679	56,000	0.23
11	Fairview Road	Wilson to Newport	10,215	56,000	0.18
12	Newport Boulevard (North)	Bristol to Mesa	7,214	N/A*	N/A*
13	Newport Boulevard (North)	Mesa to Fair	6,061	N/A*	N/A*
14	Newport Boulevard (North)	Fair to Vanguard	11,487	N/A*	N/A*

15	Newport Boulevard (North)	Vanguard to Fairview	10,173	N/A*	N/A*
16	Newport Boulevard (South)	Bristol to Mesa	28,366	N/A*	N/A*
17	Newport Boulevard (South)	Mesa to Fair	23,347	N/A*	N/A*
18	Newport Boulevard (South)	Fair to Vanguard	10,361	N/A*	N/A*
19	Newport Boulevard (South)	Vanguard to Fairview	7,973	N/A*	N/A*
20	Harbor Boulevard	Wilson to Fair	43,793	68,000	0.64
21	Harbor Boulevard	Fair to Adams	43,513	68,000	0.64
22	Harbor Boulevard	Adams to Baker	51,390	68,000	0.76

\* This segment of roadway is a one-way couplet. Neither the City of Costa Mesa nor the County of Orange has an established standard for the capacity of a one-way couplet.

*These changes to the Draft EIR are refinements to the text and have no material effect on the analysis or findings of the EIR, other than as discussed elsewhere in the EIR Errata or the Final EIR.*

**Table 4.12.K: Existing Fair Event Plus Master Plan Peak Hour Levels of Service [DEIR page 4.12-29]**

<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>	<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>
1. Harbor Blvd/Baker St	0.59	A	12. Fairview Rd/I-405 NB Ramp	0.76	C
2. Harbor Blvd/Adams Ave	0.74	C	13. Vanguard Way/Fair Dr <i>TS</i>	0.54	A
3. Harbor Blvd/Fair Drive	0.50	A	14. Fair Main Entry/Fair Dr <i>TS</i>	0.45	A
4. Harbor Blvd/Wilson St	0.66	B	15. Newport Blvd (S)/Fair Dr <i>TX</i>	0.38	A
5. Harbor Blvd/Victoria St	0.70	B	16. Newport Blvd (N)/Del Mar Ave	0.56	A
6. Fairview Rd/Newport Blvd	0.67	B	17. Orange Ave/Del Mar Ave	10.6 sec.	B
7. Fairview Rd/Wilson St	0.54	A	18. Santa Ana Ave/Del Mar Ave	11.3 sec.	B
8. Fairview Rd/Fair Dr	0.56	A	19. Newport Blvd (S)/Mesa Dr	0.67	B
9. Fairview Rd/Adams Ave	0.57	A	20. Newport Blvd (N)/Mesa Dr	0.41	A
10. Fairview Rd/Baker St	0.54	A	21. Fairview Rd/Arlington Dr	0.55	A
11. Fairview Rd/I-405 SB Ramp	0.67	B			

<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>	<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>
<del>1. Harbor Blvd/Baker St</del>	<del>0.59</del>	<del>A</del>	<del>10. Fairview Rd/Baker St</del>	<del>0.53</del>	<del>A</del>
<del>2. Harbor Blvd/Adams Ave</del>	<del>0.73</del>	<del>C</del>	<del>11. Fairview Rd/I-405 SB Ramp</del>	<del>0.63</del>	<del>B</del>
<del>3. Harbor Blvd/Fair Drive</del>	<del>0.49</del>	<del>A</del>	<del>12. Fairview Rd/I-405 NB Ramp</del>	<del>0.73</del>	<del>C</del>
<del>4. Harbor Blvd/Wilson St</del>	<del>0.65</del>	<del>B</del>	<del>13. Vanguard Way/Fair Dr</del>	<del>0.53</del>	<del>A</del>
<del>5. Harbor Blvd/Victoria St</del>	<del>0.70</del>	<del>B</del>	<del>14. Fair Main Entry/Fair Dr</del>	<del>0.41</del>	<del>A</del>
<del>6. Fairview Rd/Newport Blvd</del>	<del>0.65</del>	<del>B</del>	<del>15. Newport Blvd (S)/Fair Dr</del>	<del>0.38</del>	<del>A</del>
<del>7. Fairview Rd/Wilson St</del>	<del>0.54</del>	<del>A</del>	<del>16. Newport Blvd (N)/Del Mar Ave</del>	<del>0.55</del>	<del>A</del>
<del>8. Fairview Rd/Fair Dr</del>	<del>0.51</del>	<del>A</del>	<del>17. Orange Ave/Del Mar Ave</del>	<del>10.6 sec.</del>	<del>B</del>
<del>9. Fairview Rd/Adams Ave</del>	<del>0.57</del>	<del>A</del>	<del>18. Santa Ana Ave/Del Mar Ave</del>	<del>11.2 sec.</del>	<del>B</del>

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**Table 4.12.L: Fair Event Plus Master Plan Daily Traffic Volumes [DEIR page 4.12-29]**

	Street	Segment	Volume	Capacity	V/C
1	Fair Drive	Harbor to Fairview	10,453	38,000	0.28
2	Fair Drive	Fairview to Vanguard	27,295	38,000	0.72
3	Fair Drive	Vanguard to Newport Blvd	25,144	38,000	0.66
4	Del Mar Avenue	Newport Blvd to Orange	11,069	38,000	0.29
5	Del Mar Avenue	Orange to Santa Ana	9,502	38,000	0.25
6	Fairview Road	I-405 to Baker	48,573	56,000	0.87
7	Fairview Road	Baker to Adams	46,295	56,000	0.83
8	Fairview Road	Adams to Arlington	34,877	56,000	0.62
9	Fairview Road	Arlington to Fair	31,109	56,000	0.56
10	Fairview Road	Fair to Wilson	14,164	56,000	0.25
11	Fairview Road	Wilson to Newport	11,366	56,000	0.20
12	Newport Boulevard (North)	Bristol to Mesa	9,371	N/A*	N/A*
13	Newport Boulevard (North)	Mesa to Fair	6,777	N/A*	N/A*
14	Newport Boulevard (North)	Fair to Vanguard	12,128	N/A*	N/A*
15	Newport Boulevard (North)	Vanguard to Fairview	10,391	N/A*	N/A*
16	Newport Boulevard (South)	Bristol to Mesa	29,815	N/A*	N/A*
17	Newport Boulevard (South)	Mesa to Fair	22,337	N/A*	N/A*
18	Newport Boulevard (South)	Fair to Vanguard	10,202	N/A*	N/A*
19	Newport Boulevard (South)	Vanguard to Fairview	7,848	N/A*	N/A*
20	Harbor Boulevard	Wilson to Fair	44,060	68,000	0.65
21	Harbor Boulevard	Fair to Adams	49,664	68,000	0.73
22	Harbor Boulevard	Adams to Baker	55,770	90,000	0.82
23	Arlington Drive	Fairview to Newport Blvd	6,582	12,500	0.53

	Street	Segment	Volume	Capacity	V/C
1	Fair Drive	Harbor to Fairview	10,361	38,000	0.27
2	Fair Drive	Fairview to Vanguard	26,716	38,000	0.70
3	Fair Drive	Vanguard to Newport Blvd	24,587	38,000	0.65
4	Del Mar Avenue	Newport Blvd to Orange	11,022	38,000	0.29
5	Del Mar Avenue	Orange to Santa Ana	9,455	38,000	0.25
6	Fairview Road	I-405 to Baker	47,600	56,000	0.85
7	Fairview Road	Baker to Adams	45,322	56,000	0.81
8	Fairview Road	Adams to Arlington	33,904	56,000	0.61
9	Fairview Road	Arlington to Fair	30,483	56,000	0.54
10	Fairview Road	Fair to Wilson	13,862	56,000	0.25
11	Fairview Road	Wilson to Newport	11,064	56,000	0.20
12	Newport Boulevard (North)	Bristol to Mesa	8,814	N/A*	N/A*
13	Newport Boulevard (North)	Mesa to Fair	6,220	N/A*	N/A*
14	Newport Boulevard (North)	Fair to Vanguard	12,128	N/A*	N/A*
15	Newport Boulevard (North)	Vanguard to Fairview	10,391	N/A*	N/A*

16	Newport Boulevard (South)	Bristol to Mesa	29,258	N/A*	N/A*
17	Newport Boulevard (South)	Mesa to Fair	21,549	N/A*	N/A*
18	Newport Boulevard (South)	Fair to Vanguard	10,202	N/A*	N/A*
19	Newport Boulevard (South)	Vanguard to Fairview	7,848	N/A*	N/A*
20	Harbor Boulevard	Wilson to Fair	44,013	68,000	0.65
21	Harbor Boulevard	Fair to Adams	49,572	68,000	0.73
22	Harbor Boulevard	Adams to Baker	55,723	68,000	0.82

\* This segment of roadway is a one-way couplet. Neither the City of Costa Mesa nor the County of Orange has an established standard for the capacity of a one-way couplet.

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### Access and Circulation [DEIR page 4.12-30]

As indicated on the site plan, access to the proposed project will be provided at ten nine points:

- **Fair Drive Entrance (Gate 1)** is located on Fair Drive across from the City of Costa Mesa City Hall. This gate has a traffic signal to direct traffic.
- **Vanguard Way Entrance (Gate 2)** is also on Fair Drive located directly across from Vanguard Way. This gate has a traffic signal to direct traffic.
- **Fairview Road/Princeton Drive Entrance (Gate 3)** is used for egress only during the regular weekend swap-meet activities. This gate is locked during the Fair (and restricted to buses only).
- **Merrimac Way Entrance (Gate 3-4)** is located at the intersection of Fairview Road and Merrimac Way. A signal provides traffic direction at this gate.
- **Arlington Drive Entrance (Gate 4 5)** ~~is reserved for VIP and media credentialed visitors during the Fair-~~ is located on Arlington Drive east of Fairview Road. This gate may be used by Orange Coast College students parking in Lot E or to provide access to Lot F during interim events.
- **Arlington Drive Entrance (Gate 5-6)** is a service entrance. It is primarily a walk-in entrance for staff, concessionaires, and exhibitors who park across the street. Only emergency and maintenance vehicles are permitted to use this gate, as it has no access to parking.
- **Arlington Drive (Gate 7)** is reserved as a service entrance. This gate is used for deliveries and by credentialed personnel during the Fair and interim events. This gate provides access to the OCFEC service zone. It does not provide access to guest parking. This gate does not have a traffic signal.

- **Equestrian Center Entrance (Gate 8 9)** is used only by vehicles related to the equestrian center or the livestock exhibits during selected special events, the Fair, and other year-round events.
- ~~Arlington Drive Lot E Entrance is located on Arlington Drive approximately half the distance between Fairview Drive and Gate 4. This gate is open to the public during peak traffic times and is used to fill Lot E. Lot E parking is also made available to Orange Coast College students for parking on a year-round basis at no charge.~~
- **Newport Boulevard (Gate 10)** provides access to guest parking on the west side of the OCFEC. **This gate provides signalized access to Newport Blvd. and is the only ingress/egress for the OCFEC on Newport Blvd.**

These access points—in addition to ~~a new~~ an expanded access point on Arlington Drive (**Gate 8**) between the Equestrian Center entrance and the Arlington Drive service entrance—will remain after project implementation and will continue to provide full access into and out of the project site. Any entrances that are altered during implementation of the proposed Master Plan will be constructed in a manner that allows safety and emergency vehicle access (see Section 4.10, Public Services and Utilities, and Section 4.7, Land Use). Therefore, the proposed project will not meet or exceed Impact Significance Criteria 12-C or 12-E.

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**[DEIR page 4.12-31]**

~~Per the Orange County Master Plan of Regional Riding and Hiking Trails (MPRRHT) and the Orange County Transportation Authority Bikeway Strategic Plan, a Class I bikeway exists along half of the south side and all of the east side of the Fairgrounds. Class II bikeways exist along the north, west, and south sides of the Fairgrounds. As stated in Section 4.11, Recreation, entrances will be designed in such a way that bicyclists will have easy access, including off-road connections, between the bikeways and bike racks/lockers. Therefore the project will not meet or exceed Impact Significance Criteria 12-G and 12-H.~~

*This change to the Draft EIR is a refinement to the text and has no material effect on the analysis or findings of the EIR.*



## TRAFFIC IMPACT ANALYSIS

**Table T: Cumulative Interim Event Plus Master Plan Peak Hour Levels of Service [PAGE 43]**

Intersection	V/C or Delay	LOS	Intersection	V/C or Delay	LOS
1. Harbor Blvd/Baker St	0.66	B	12. Fairview Rd/I-405 NB Ramp	0.82	D
2. Harbor Blvd/Adams Ave	0.86	D	13. Vanguard Way/Fair Dr	0.65	B
3. Harbor Blvd/Fair Drive	0.60	A	14. Fair Main Entry/Fair Dr	0.51	A
4. Harbor Blvd/Wilson St	0.77	C	15. Newport Blvd (S)/Fair Dr	0.61	B
5. Harbor Blvd/Victoria St	0.76	C	16. Newport Blvd (N)/Del Mar Ave	0.77	C
6. Fairview Rd/Newport Blvd	0.68	B	17. Orange Ave/Del Mar Ave	0.49	A
7. Fairview Rd/Wilson St	0.56	A	18. Santa Ana Ave/Del Mar Ave	0.49	A
8. Fairview Rd/Fair Dr	0.76	C	19. Newport Blvd (S)/Mesa Dr	0.67	B
9. Fairview Rd/Adams Ave	0.68	B	20. Newport Blvd (N)/Mesa Dr	0.44	A
10. Fairview Rd/Baker St	0.62	B	21. Fairview Rd/Arlington Dr	0.57	A
11. Fairview Rd/I-405 SB Ramp	0.77	C			

Intersection	V/C or Delay	LOS	Intersection	V/C or Delay	LOS
1. Harbor Blvd/Baker St	0.66	B	10. Fairview Rd/Baker St	0.60	A
2. Harbor Blvd/Adams Ave	0.86	C	11. Fairview Rd/I-405 SB Ramp	0.74	C
3. Harbor Blvd/Fair Drive	0.60	A	12. Fairview Rd/I-405 NB Ramp	0.77	C
4. Harbor Blvd/Wilson St	0.77	C	13. Vanguard Way/Fair Dr	0.60	B
5. Harbor Blvd/Victoria St	0.76	C	14. Fair Main Entry/Fair Dr	0.47	A
6. Fairview Rd/Newport Blvd	0.66	B	15. Newport Blvd (S)/Fair Dr	0.60	A
7. Fairview Rd/Wilson St	0.56	A	16. Newport Blvd (N)/Del Mar Ave	0.76	C
8. Fairview Rd/Fair Dr	0.71	C	17. Orange Ave/Del Mar Ave	11.3 sec.	B
9. Fairview Rd/Adams Ave	0.68	B	18. Santa Ana Ave/Del Mar Ave	12.2 sec.	B

As indicated in Table T, when Master Plan interim event project traffic is added to the cumulative interim event traffic volumes, the study area intersections are forecast to continue to operate at satisfactory levels of service. Daily roadway traffic volumes during the cumulative interim event with the Master Plan are presented in Table U.

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[Page 49]

**Table W: Cumulative Fair Event Plus Master Plan Peak Hour Levels of Service**

<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>	<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>
1. Harbor Blvd/Baker St	0.66	B	12. Fairview Rd/I-405 NB Ramp	0.77	C
2. Harbor Blvd/Adams Ave	0.81	D	13. Vanguard Way/Fair Dr	0.56	A
3. Harbor Blvd/Fair Drive	0.59	A	14. Fair Main Entry/Fair Dr	0.48	A
4. Harbor Blvd/Wilson St	0.74	C	15. Newport Blvd (S)/Fair Dr	0.39	A
5. Harbor Blvd/Victoria St	0.75	C	16. Newport Blvd (N)/Del Mar Ave	0.57	A
6. Fairview Rd/Newport Blvd	0.69	B	17. Orange Ave/Del Mar Ave	11.7 sec.	B
7. Fairview Rd/Wilson St	0.55	A	18. Santa Ana Ave/Del Mar Ave	12.3 sec.	B
8. Fairview Rd/Fair Dr	0.60	A	19. Newport Blvd (S)/Mesa Dr	0.67	B
9. Fairview Rd/Adams Ave	0.62	B	20. Newport Blvd (N)/Mesa Dr	0.43	A
10. Fairview Rd/Baker St	0.56	A	21. Fairview Rd/Arlington Dr	0.56	A
11. Fairview Rd/I-405 SB Ramp	0.69	B			

<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>	<u>Intersection</u>	<u>V/C or Delay</u>	<u>LOS</u>
1. Harbor Blvd/Baker St	0.66	B	10. Fairview Rd/Baker St	0.55	A
2. Harbor Blvd/Adams Ave	0.81	D	11. Fairview Rd/I-405 SB Ramp	0.65	B
3. Harbor Blvd/Fair Drive	0.59	A	12. Fairview Rd/I-405 NB Ramp	0.74	C
4. Harbor Blvd/Wilson St	0.73	C	13. Vanguard Way/Fair Dr	0.56	A
5. Harbor Blvd/Victoria St	0.75	C	14. Fair Main Entry/Fair Dr	0.43	A
6. Fairview Rd/Newport Blvd	0.67	B	15. Newport Blvd (S)/Fair Dr	0.39	A
7. Fairview Rd/Wilson St	0.55	A	16. Newport Blvd (N)/Del Mar Ave	0.56	A
8. Fairview Rd/Fair Dr	0.55	A	17. Orange Ave/Del Mar Ave	11.6 sec.	B
9. Fairview Rd/Adams Ave	0.62	B	18. Santa Ana Ave/Del Mar Ave	12.2 sec.	B

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## ADDITIONAL INFORMATION

# ORANGE COUNTY FAIR AND EXPOSITION CENTER PARKING OPERATIONS MANUAL

## INTRODUCTION

The Orange County Fair and Exposition Center (OCFEC) is a year-round exhibition, conference, and event center. The function of the OCFEC is to provide education, entertainment, and recreational opportunities for the general public and to preserve the agricultural heritage of Orange County. In recognition of this mission, the OCFEC hosts an annual summer Fair.

There are events and exhibitions occurring at the OCFEC each weekend, including the Orange County Marketplace, a swap meet that occupies a portion of OCFEC's parking lot. The purpose of this manual is to describe on-site parking operations during Fair and Interim events that may occur at the OCFEC throughout the year. The available gates and parking areas described in this manual are consistent with the OCFEC Master Plan.

This manual has been developed to support the OCFEC Master Plan. The procedures set forth in this manual are specifically intended to guide the operation of the parking areas in the Master Plan configuration. It should be noted that the procedures set forth in this manual are based on the successful existing parking operation currently in place at the OCFEC. Instruction for the setup, maintenance, and closure of the parking areas serving the OCFEC is provided in this document. This manual is divided into sections, which provide details regarding the operation of the parking areas during each of the discrete phases of parking operations:

- Parking lot setup
- Initial filling of the parking lots
- Traffic control and maintenance after the lots have been filled
- Parking lot exiting procedures
- Parking facility closure at close of business

This manual also provides for standard nomenclature for the parking lots, entrance gates, and driveways, as well as position descriptions for personnel assignments.

It should be noted that the positions, gates, parking lots, and procedures outlined in this manual are intended to accommodate the annual Fair event and large interim events unless otherwise noted. These procedures can be implemented incrementally to accommodate smaller events that would not require the use of all the parking facilities on the Fairgrounds.

## DEFINITIONS

Because of the importance of communication among team members, it is critical to have one set of definitions to avoid misunderstandings. A site plan of the OCFEC Master Plan showing the primary features that will be discussed within this Operations Manual is illustrated in Figure 1. The following definitions have been devised from parking operation procedures currently used by OCFEC staff during interim events and the annual summer Fair and applied to the OCFEC Master Plan. Unless otherwise noted, definitions are intended to explain uses and operations during the Fair and large interim events.

### Entrance/Exit Gates

**Fair Drive, Gate 1.** Gate 1, or Main Gate, is located on the south side of the Fairgrounds, on Fair Drive, approximately 1,100 feet west of Newport Boulevard. This gate has a traffic signal to direct traffic. During the Fair, Gate 1 provides access to the main passenger loading and unloading zone, but no access to parking lots is allowed. During interim events, this gate may provide vehicular access to patron parking in Lots A and B.

**Vanguard Way, Gate 2.** Gate 2 is also on Fair Drive, directly across from Vanguard Way. This gate has a traffic signal to direct traffic. Gate 2 provides vehicular access to Parking Lots B and C. During the Fair Event, Gate 2 will remain open to inbound traffic from eastbound Fair Drive. During large interim events, this gate provides vehicular access to patron parking.

**Princeton Drive, Gate 3.** Gate 3 is located on Fairview Road across from Princeton Drive. The gate is used as an exit for vehicles parked in Lots C and D during weekend retail activities (e.g., Orange County Marketplace). This gate is locked during the annual summer Fair.

**Merrimac Way, Gate 4.** Gate 4 is located at the intersection of Fairview Road and Merrimac Way. A signal provides traffic control at this gate. This gate provides access to Parking Lots D, E, and F. This gate provides vehicular access to patron parking during large interim events and the summer Fair.

**Arlington Drive, Gate 5.** Gate 5 is located on Arlington Drive just east of Fairview Road. Weekdays when Orange Coast College is in session, this gate provides access to student parking in Lot E. This gate may also be used as a VIP entrance during the Fair and may serve as an access point for Lot F or an exhibitor entrance during interim events.

**Arlington Drive, Gate 6.** Gate 6 is located on Arlington Drive approximately halfway between Fairview Road and Newport Boulevard, across from Davis Intermediate School. Access to the Fairgrounds from this gate is reserved for credentialed personnel during the Fair. During interim events this gate is used as a public entrance, exhibitor entrance, and service entrance. This gate may

also be used by delivery trucks and other service providers because it provides access to the OCFEC service zone. This gate does not provide access to guest parking during the Fair. This gate does not have a traffic signal.

**Arlington Drive, Gate 7.** Gate 7 is reserved as a service entrance. Located on Arlington across from Davis Intermediate School, east of Gate 6, this gate is used for deliveries and by credentialed personnel during the Fair and interim events, and employees and deliveries for other non-Fair periods. This gate provides access to the OCFEC service zone, including storage areas, service vehicle parking, and a maintenance shop. This gate does not provide access to guest parking. This gate does not have a traffic signal.

**Arlington Drive, Gate 8.** Gate 8, formerly the Equestrian Center Gate, is located across from TeWinkle Park. During Fair and Interim events, this gate will be used as an exit for Lot H as needed. Use of this gate as an exit will be coordinated with the Costa Mesa Police Department. Gate 8 is also used as an entrance for the shuttle from the off-site parking area at the Experian parking structure during the annual Fair. This gate does not have a traffic signal.

**Arlington Drive, Gate 9.** Gate 9 is the relocated Equestrian Center Gate. This access point is located just east of the Arlington/Junipero intersection. Access to the OCFEC from this gate is limited to vehicles related to the equestrian center or the livestock exhibits during selected special events, the annual summer Fair, and other year-round events. This gate does not have a traffic signal.

**Newport Boulevard, Gate 10.** Gate 10 is located on the east side of the Fairgrounds, on Newport Boulevard, approximately 1,200 feet north of Fair Drive. Gate 10 provides access to Lots A, H, and G. This gate provides signalized access to Newport Boulevard and is the only ingress/egress for the OCFEC on Newport Boulevard.

## **Driveways**

**Internal Loop Road.** Parking lot circulation is facilitated by an internal loop road that circulates through the parking lots, beginning at Gate 5 (Arlington) in the west and forming a "U" shape that follows the perimeter of the Fairgrounds facilities, ending at Gate 8 (Arlington). This drive aisle will guide vehicular circulation throughout the public parking areas and serve to disperse and collect vehicular traffic from the various parking areas. The Internal Loop Road will be composed of three primary drive aisles explained below.

- **Fairview Loop Aisle.** Fairview Loop Aisle is the primary north-south driveway in Lots E, D, and C and comprises the western portion of the internal loop road that connects the western portion of the OCFEC with the southern and eastern portions of the facility.
- **Fair Loop Aisle.** Fair Loop Aisle is the primary east-west driveway in Lots A, B, and C. Fair Loop Aisle provides an east-west connection between the parking areas adjacent to Newport



Boulevard, in the east, and those in Parking Lot C, in the west. Fair Loop Aisle is the southern portion of the Internal Loop Road, and it connects the Fairview Loop Aisle with the Newport Loop Aisle.

- **Newport Loop Aisle.** Newport Loop Aisle is the primary north-south driveway in Lots A and H and comprises the eastern portion of the internal loop road connecting the eastern portion of the OCFEC to the western and southern portions of the facility.

**Perimeter Loop Road.** The Internal Loop Road will be mirrored by a second loop road that will abut the perimeter of the Fairgrounds, but will not provide direct access to a vehicular entrance/exit. The Perimeter Loop Road will be used primarily for on-site circulation. Like the Internal Loop Road, the Perimeter Loop Road will form a “U” shape that connects the eastern, southern, and western portions of the OCFEC. The pedestrian sidewalks alongside the Perimeter Loop Road have been widened to improve safety and provide additional pedestrian capacity.

**Fair Main Drive.** This is the primary north-south access driveway from Gate 1 (Main Gate) and the passenger loading area near the main entrance to the Fairgrounds proper. During the Fair, this driveway is used only by vehicles destined to the passenger loading area. During interim events, this driveway is used by vehicles entering Parking Lots A and B.

**Vanguard Main Drive.** This is the primary north-south access driveway from Gate 2 (Vanguard) to the Fair Loop Aisle and the Perimeter Loop Road. This driveway is used by vehicles entering and exiting Lots B and C.

**Princeton Main Drive.** This is the easterly extension of the Princeton Gate to the Internal Loop Road and the Perimeter Loop Road. During the summer Fair, Princeton Main Drive is used by vehicles entering Lots D and E via Gate 4. The Princeton driveway serves an exit route for Lots C and D during weekend retail activities.

**Merrimac Main Drive.** This is the primary east-west access driveway from Gate 4 (Merrimac) to the Newport Loop Aisle and the Perimeter Loop Road. This driveway is used by vehicles entering and exiting Lots E and F.

**Newport Main Drive.** This is the primary east-west access driveway, and serves as a connection between Gate 10 (Newport) and Lots A, G, and H.

## **Parking Lots**

**Lot A.** Lot A is located directly east of the Main Entrance on Fair Drive. Access to this lot is provided from Gate 10 via the Newport Main Drive. This lot is used by vendors at weekend retail

activities (e.g., the Orange County Marketplace) and the weekly Farmer's Market, and as a result is not available for parking during most non-Fair weekends. Lot A provides approximately 2,300 parking spaces.

**Lot B.** Lot B is located directly west of the Main Entrance on Fair Drive. This parking area is bounded by Vanguard Main Drive to the west, Fair Main Drive to the east, and the Perimeter Loop Road adjacent to Centennial Farm and the Amphitheater to the north. Access to this parking area is provided by Gate 2 (Vanguard). Lot B provides parking for patrons during the annual summer Fair, interim events, and weekend retail activities. Parking Lot B provides parking spaces for approximately 1,900 vehicles.

**Lot C.** Lot C is located in the extreme southwest corner of the OCFEC, near the intersection of Fair Drive and Fairview Road. Access to this parking area is provided by Gate 2 (Vanguard). Gate 3 (Princeton) serves as an exit for Lot C during weekend retail activities, but remains locked during the annual summer Fair. Lot C provides parking for patrons during the annual summer Fair, interim events, and weekend retail activities. Lot C provides approximately 620 parking spaces.

**Lot D.** Lot D is located on the west side of the Fairgrounds, north of Lot C and south of Lot E. Access to Parking Lot D is provided by Gate 4 (Merrimac). Lot D provides parking for patrons during the annual summer Fair, interim events, and weekend retail activities. Parking Lot D provides parking spaces for approximately 950 vehicles.

**Lot E.** Lot E is located in the extreme northwest corner of the OCFEC, near the intersection of Fairview Road and Arlington Drive. Access to this parking area is provided by Gate 4 (Fairview/Merrimac) and 5 (Arlington). Parking Lot E is used by patrons of the OCFEC during the annual summer Fair, interim events and weekend retail activities. During the rest of the year, parking in Lot E is made available to Orange Coast College (OCC) students. Although the OCFEC does not charge students to park in this lot, students parking in Lot E must have a permit issued by OCC. Access for Orange Coast College students to Lot E is provided via Gate 5. Lot E provides approximately 585 parking spaces.

**Lot F.** Lot F is located within the Fairground proper. Access to Lot F will be provided from Gates 4 and 5. This parking area will not be available for vehicle parking during the annual summer Fair, as it will be used for the Carnival Midway in the Fair Master Plan condition. During interim events, Parking Lot F is used by event patrons and/or event exhibitors. Lot F provides approximately 1,100 parking spaces.

**Lot G.** Lot G is located along the Newport Boulevard edge of the Fairgrounds, directly south of the Equestrian Center. Access is provided by Gate 10 (Newport). Parking Lot G is primarily used by

Equestrian Center users although it is also used by patrons of the annual summer Fair on a limited basis. Lot G provides approximately 500 parking spaces.

**Lot H.** Lot H is located on the east side of the Fairgrounds, with the Equestrian Center to the east and the Livestock Enclosure to the west. Access to Lot H is provided by Gate 10 (Newport). Lot H provides parking for patrons during the annual summer Fair, interim events, and weekend retail activities. Lot H provides approximately 900 parking spaces.

### **Position Descriptions**

To ensure the smooth flow of traffic from the public street to the various on-site parking facilities, staffing by personnel with defined responsibilities is required at key locations. This section will provide a description of the key locations and a brief description of the primary responsibilities for each position. As patrons come to the OCFEC, they will look to these personnel for direction to parking spaces. The persons filling these position must be animated, courteous, and helpful. Above all, they need to **KEEP THE TRAFFIC MOVING AND DIRECT THE PATRONS TO PARKING SPACES** in a clear and concise manner. Figure 2 illustrates the location of each position on the Fairgrounds.

**Department Supervisor.** The Department Supervisor oversees all parking operations and is ultimately responsible for ensuring that OCFEC policies are followed. Responsibilities include coordinating with patrons, staff, and exhibitors to resolve concerns, establishing a safe and positive work environment for staff, and conducting staff orientation and training meetings. The Department Supervisor is the primary contact for coordination of parking/transportation activities with agencies outside the OCFEC including the California Department of Transportation (Caltrans), Orange County Sheriffs Department, Costa Mesa Police Department, Newport Mesa Unified School District, Shuttle Contractor, Automobile Club of Southern California (AAA), Experian, and others. The Department Supervisor also serves as the primary contact for questions from other departments within the OCFEC.

**Office Coordinator.** The Parking Office Coordinator is responsible for staff scheduling, answering phones, distributing equipment/supplies to staff, tracking timecards, preparing staff reports, and managing the office in a professional and organized manner. The Office Coordinator also responds to queries from the OCFEC and AAA radio systems and dispatches AAA when needed. The Office Coordinator communicates with Leads to notify them of staff arrivals and available staff.

**Field Leads.** Field Leads ensure that all gates and parking areas (both on-site and off-site) are properly set up including signage, ropes, barricades, cones, and other necessary equipment. Field Leads are responsible for deploying personnel to the correct areas and ensuring that traffic is flowing smoothly by monitoring the ebb and flow of traffic and parking. In the Department Supervisor's absence, Field Leads may be required to communicate with the Costa Mesa Police Department and

**Shuttle Contractor.** Field Leads handle patron and employee complaints and report possible personnel issues to the Department Supervisor. Field Leads coordinate breaks for attendants and with other Leads. At the end of an event or day, Field Leads direct personnel in the dismantling of parking lot and gate set ups and ensure that all equipment is cleaned and returned to the appropriate storage areas.

**Equestrian Center Leads.** In addition to the duties described above, Equestrian Center Leads ensure that parking area attendants are checking for proper credentials to enter the Equestrian Center and/or Lot G, and redirecting vehicles without proper identification to an open gate.

**Off-Site Leads.** In addition to the duties of an on-site Field Lead, Off-site Leads ensure that all signage on the exterior of the OCFEC and at off-site parking lots is correct. Off-site Leads monitor the available supply of parking at off-site lots and report to Field Leads. Off-site Leads also monitor shuttle programs, ensure shuttle service is running smoothly and that attendants are checking for proper credentials in those off-site lots that require permits.

**Blue Crew Leads (1-5 Positions Dependent upon Need).** Blue Crew Leads ensure that attendants are directing patrons to appropriate parking areas (e.g., handicap lots, motorcycle parking, drop off/pick up areas) and answering questions appropriately. Blue Crew Leads are also responsible for ensuring that attendants are directing traffic in a safe and effective manner.

**Break Leads.** Break Leads transport attendants to and from the parking office to their assigned posts at the beginning of their shift, during breaks, and at the end of their shift. Break Leads communicate with the Office Coordinator and with other Leads to monitor and schedule break times. Break Leads may also distribute necessary equipment to staff, including jackets, flashlights, vests, hats, water, and other items. As Break Leads move about the OCFEC, they monitor parking areas and attendants and report any concerns to appropriate leads or the Department Supervisor.

**Assistant Field Leads.** Assistant Field Leads take direction from Field Leads and assist, as needed, in all tasks assigned to Field Leads.

**Blue Crew Attendants (6-20 Positions Dependent upon Need).** Blue Crew Attendants are stationed along the main drive/aisle of the lot being parked. These attendants are responsible for directing vehicular traffic in the lot being parked, answering questions, directing guests to the nearest Fair entrance, and ensuring that vehicles are parked quickly and efficiently. During weekdays, two "Blue Crews" will be used to help fill the parking lots. The Blue Crews will move from one lot to another as needed. During busy weekends, as many as four or five Blue Crews may be used.

**Main Gate Loading and Unloading Zone Attendants (2 Positions).** These attendants are located near the main entrance to the OCFEC and are responsible for making sure that patrons do not park or leave their vehicles unattended at any time in the passenger loading and unloading zone. These attendants will redirect guests looking to park vehicles to the entrance at Gate 2 (Vanguard Way). These attendants also monitor the bus/taxi drop off and pick up areas and direct traffic exiting Lots A and B.

**Gate 2 (Vanguard Way) Attendants (2 Positions).** These attendants are located at Gate 2 and are responsible for directing traffic entering and exiting the OCFEC at this gate. Gate 2 Attendants are responsible for exiting vehicles, directing guests to the nearest Fair entrance, and reporting suspicious activities to Field Leads or the Department Supervisor. Gate 2 Attendants are also responsible for ensuring that vehicles are utilizing all available stacking lanes on Fair Drive and Vanguard Way and that entering traffic does not mix with exiting traffic. One Gate 2 attendant is a Gate 2 “point” and the other is a Gate 2 “street.”

**Gate 4 (Merrimac Way) Attendants.** These attendants are located at Gate 4 and are responsible for directing traffic entering and exiting the OCFEC at this gate. Gate 4 Attendants are responsible for exiting vehicles, directing guests to the nearest Fair entrance, and reporting suspicious activities to Field Leads or the Department Supervisor.

**Gate 5 (Arlington Drive) Attendants.** These attendants are located at Gate 5 and are responsible for directing traffic entering and exiting the OCFEC at this gate. Gate 5 Attendants are responsible for checking credentials of vehicles parking in Lot F. Gate 5 Attendants are also responsible for exiting vehicles, directing guests to the nearest Fair entrance, and reporting suspicious activities to Field Leads or the Department Supervisor.

**Gate 6 (Arlington Drive) Attendants.** Attendants at Gate 6 are responsible for checking credentials of all personnel entering the OCFEC at this gate. These attendants will redirect patrons to the nearest public entrance if they do not have proper credentials.

**Gate 7 (Arlington Drive) Attendants.** Attendants at Gate 7 are responsible for checking the credentials of all personnel entering the OCFEC at Gate 7 and redirecting patrons without proper credentials to the nearest public entrance. Gate 7 Attendants must also coordinate with the Department Supervisor to obtain a list of deliveries scheduled to arrive at the Gate 7 service entrance.

**Gate 8 (Arlington Drive) Attendants.** These attendants are located at Gate 8 and are responsible for directing traffic entering and exiting the OCFEC at this gate. Gate 8 Attendants are responsible for exiting vehicles, directing guests to the nearest Fair entrance, and reporting suspicious activities to Field Leads or the Department Supervisor. Gate 8 Attendants monitor traffic conditions on Arlington and report delays to Field Leads.

**Gate 9 (Arlington Drive) Attendants.** These attendants are located at Gate 9 and are responsible for verifying that all vehicles entering the Equestrian Center have proper credentials, directing guests to the nearest entrance, and reporting suspicious activities to Field Leads or the Department Supervisor. Gate 9 Attendants monitor traffic conditions on Arlington and report delays to Field Leads.

**Gate 10 (Newport Boulevard) Attendants (2 Positions).** These parking attendants are located at Gate 10 and are responsible for opening and closing that gate. One Gate 10 attendant is a Gate 10 “point” and the other is a Gate 10 “street.” Control of this gate includes the following responsibilities:

- Traffic cone and signage setup
- Directing traffic entering and exiting the OCFEC
- Monitoring the flow of traffic on Newport Boulevard and reporting delays to Field Leads
- Opening and closing the gate to respond to traffic congestion along Newport Main Drive and Newport Boulevard
- Courteously answering questions and directing guests to the nearest entrance
- Observe parking lot activities and report any suspicious activities to Field Leads or Department Supervisor

**Newport Main Drive Attendants (Blue Crew Attendants).** These parking attendants are located along the Newport Main Drive and are responsible for directing traffic entering and exiting Lots A, G, and H, answering guest questions, directing guests to the nearest Fair entrance, and reporting suspicious activity in parking areas to Field Leads or the Department Supervisor. Newport Main Drive Attendants also limit access to Lot G by checking for proper credentials.

**Merrimac Main Drive Attendants (Blue Crew Attendants).** These parking attendants are located along Merrimac Main Drive and are responsible for directing traffic entering and exiting Lots D and E, answering guest questions, directing guests to the nearest Fair entrance, and reporting suspicious activity in parking areas to Field Leads or the Department Supervisor. Merrimac Main Drive Attendants are also responsible for checking the credentials of those vehicles parking in Lot F.

**Parking Lot A Handicap Parking Attendant (One Position).** This parking attendant is located in the portion of Parking Lot A reserved for handicapped persons. This attendant is responsible for directing traffic in these areas, answering questions and directing guests to the nearest Fair entrance, and checking that all vehicles have proper credentials upon entering this area.

**Parking Lot B Handicap Parking Attendant (One Position).** This parking attendant is located in the portion of Parking Lot B reserved for handicapped persons. This attendant is responsible for

directing traffic in these areas, answering questions and directing guests to the nearest Fair entrance, and checking that all vehicles entering this area have proper credentials.

**Parking Lot D Handicap Parking Attendant (One Position).** This parking attendant is located in the portion of Parking Lot D reserved for handicapped persons. This attendant is responsible for directing traffic in these areas, answering questions and directing guests to the nearest Fair entrance, and checking that all vehicles entering this area have proper credentials. A portion of the handicapped parking area in Lot D may be used to park vehicles associated with the production of concerts in the Pacific Amphitheater. Lot D Attendants will also check for proper credentials for production vehicles parking in this area.

**Parking Lot H Handicap Parking Attendant (One Position).** This parking attendant is located in the portion of Parking Lot H reserved for handicapped persons. This attendant is responsible for directing traffic in these areas, answering questions and directing guests to the nearest Fair entrance, and checking that all vehicles entering this area have proper credentials.

**Parking Lot F Attendants (Blue Crew Attendants).** These attendants are responsible for directing traffic in Lot F, answering questions, directing guests to the nearest Fair entrance, and checking that all vehicles entering this area have proper credentials.

**Parking Lot G Attendants (Blue Crew Attendants).** These attendants are located near the pedestrian entrance to the Equestrian Center. Lot G Attendants verify that all vehicles parking in Lot G have proper credentials and direct traffic entering and exiting Lot G.

**Off-Site Parking Attendants (8 Positions).** Off-site parking attendants are located at off-site parking areas including, but not limited to, Davis Intermediate School (four attendants, one lead), Costa Mesa High School (Blue Crew, one attendant), and Orange Coast College (two attendants, one lead). Off-Site Parking Attendants direct vehicles to designated areas, check for proper credentials if required, ensure that shuttle services are running smoothly, and communicate any problems to Leads or the Department Supervisor.

## **PARKING LOT OPERATIONS**

The following sections outline procedures for operating each parking lot during the summer Fair event. During most non-Fair weekends, the Orange County Market Place will occupy Lot A. During Market Place weekends, parking lots are operated by Market Place personnel, consistent with the Orange County Market Place Parking Operations Manual. Most Interim events are smaller in scale than the annual Fair event and may not require use of the entire Fairgrounds parking area. During Interim events, the Department Supervisor will identify specific gates and parking lots that will be

used to accommodate patrons. The parking lot operation procedures outlined below for each gate and parking lot should be applied to the parking lots utilized for the interim events.

## **PARKING LOT SETUP PROCEDURES**

The critical factor to the smooth and safe operation of the parking facilities is the complete and organized setup of the parking lots by means of proper traffic cone placement, proper sign placement, and the preparedness of the parking lot personnel.

### **Sign and Traffic Cone Drop Off**

At the beginning of the day, all signs, traffic cones, and barricades will be picked up from storage by an attendant from each area. Field Leads will provide direction to Gate and Blue Crew Attendants, who will be responsible for placing signs in the appropriate configuration as shown in the Signage Plan (Figure 3).

### **Arterial Street Setup**

The Department Supervisor should cooperate with the Costa Mesa Police Department (CMPD) on a regular basis throughout the year to coordinate on-street traffic operations and Fairgrounds gate operations. The CMPD should be consulted prior to any cones being placed on the arterial streets. It is the responsibility of the Gate Attendant to set up the cones in the morning on the arterial streets, in accordance with direction received by the CMPD. It is important that the cones used to channel traffic at the gates be in place early, and in the correct locations, to direct early patrons to the parking lot entrances, without creating confusion and conflicts on the surrounding roadways.

### **Staff Placement**

Prior to the opening of the Fairgrounds and the arrival of any patrons, all parking operations staff should be in place and ready to direct traffic. The Field Leads are responsible for confirming that all staff positions are filled and staff members are at their positions prior to the opening of the Fairgrounds.

## **INITIAL TRAFFIC FLOW—PARKING LOT FILLING**

Once the signs, cones, and staff members are in place, attention is placed on the systematic filling, or loading, of the parking facilities. It is important to load the parking lots in a systematic manner to avoid traffic congestion and to minimize vehicle/pedestrian conflicts. Loading should occur from front to back to avoid pedestrian conflicts and minimize turns of vehicles. Gate and Blue Crew Attendants should provide helpful but limited directions to patrons in order to keep traffic moving through the gates and into the parking lots. The on-site vehicle stacking area at each gate should be maximized by placing the location where patrons pay to park as far into the site as possible. This is currently being accomplished by collecting parking fees at the Newport Loop Aisle for patrons



entering at Gate 10 at the Princeton Main Drive for patrons entering at Gate 4, and in the on-site stacking lane for patrons entering Gate 2. Parking fees are collected by the OCFEC only during the summer Fair. Multiple inbound lanes at each gate can also create additional on-site stacking.

### **Parking Lot A**

Patrons will enter Parking Lot A through Gate 10. The Gate 10 Attendants will direct patrons toward the Newport Loop Aisle where Newport Main Drive Attendants will direct patrons toward the Fair Loop Aisle. Once at the Fair Loop Aisle, Blue Crew Attendants will direct patrons to an empty parking space. **Lot A should be filled from west to east.** During busy times, Lot A and Lot H should be filled simultaneously. This not only helps clear vehicles queued along Newport Main Drive, but also distributes traffic throughout the Fairgrounds and alleviates concentration of patrons at one OCFEC entrance. When Lots A and H are full, inbound patrons should be directed to Gates 2 and 4 using the reader board signs on Newport Boulevard.

### **Parking Lots B and C**

Patrons will enter Parking Lots B and C through Gate 2. The Gate 2 Attendants will direct patrons toward the Fair Loop Aisle where Blue Crew Attendants will direct patrons to an empty parking space. **Lot B should be the first lot filled and should be filled from east to west.** Once Lot B is filled, the Blue Crew Attendants will move to Lot C. Gate 2 attendants will then direct entering patrons toward the Fair Loop Aisle in Lot C where Blue Crew Attendants will direct patrons to an empty parking space. **Lot C should be filled from east to west.** When Lots B and C are full, Gate 2 will be closed to inbound patrons except those traveling east on Fair Drive. The reader board signs should be changed to indicate that Lots B and C are full and should guide patrons to Gate 4.

### **Parking Lots D and E**

Patrons will enter Parking Lots D and E through Gate 4. Patrons will be directed to turn right immediately after entering Gate 4, and queue along the aisle located adjacent to Fairview Road. Patrons will then be directed by Blue Crew Attendants to travel east on Princeton Main Drive and north on the Fairview Loop Aisle to fill Lot D and then Lot E. **Lots D and E should be the filled from north to south.** The reader board signs should be changed to indicate that Lot D is full and guide patrons to off-site parking opportunities.

### **Parking Lot F**

Parking Lot F is not available for parking during the summer Fair event. The Lot F Attendant will be responsible for enforcing the parking restriction in this lot during the Fair. During Interim events, patrons will enter Lot F through Gate 4. Gate 4 Attendants will direct patrons toward the Perimeter Loop Road, where the Lot F Attendant will guide patrons to an open parking space.

## Parking Lot G

Parking Lot G is primarily reserved for Equestrian Center patrons. Newport Main Drive Attendants are responsible for checking the credentials of Equestrian Center patrons and guiding them to Parking Lot G.

## Parking Lot H

Patrons will enter Parking Lot H through Gate 10. Gate 10 Attendants will guide patrons to the Newport Main Drive Attendants who will direct patrons to the Newport Loop Aisle where Blue Crew Attendants will guide patrons to an available parking space. **Lot H should be filled from north to south.** During busy periods, Lot H will be filled simultaneously with Lot A. When Lots H, and A are full, Gate 10 will be closed to all inbound patrons except those destined to Lot G or the handicapped area in Lot H. The reader board signs should be changed to direct patrons to Gate 2 or Gate 4.

## PARKING LOT MAINTENANCE PROCEDURES

Once the parking lots are filled, it is important to maintain a continuous, systematic flow of traffic through and around the Fairgrounds. The primary circulation patterns through the Fairgrounds are illustrated in Figure 4. Maintenance of this circulation pattern will provide for:

- Continuous systematic flow through the site,
- Access to the parking lots as needed to maintain filled lots,
- Multiple exit routes,
- Handicapped parking space access,
- Access to the loading zone.

During parking lot maintenance, Gate Attendants should monitor exiting vehicles and Blue Crew Attendants should monitor the parking areas to identify empty parking spaces. This information should be relayed to the Department Supervisor and/or field lead who will re-open gates as necessary to keep the parking lots full. Additional vehicles should be admitted to keep the parking lots filled during the maintenance period.

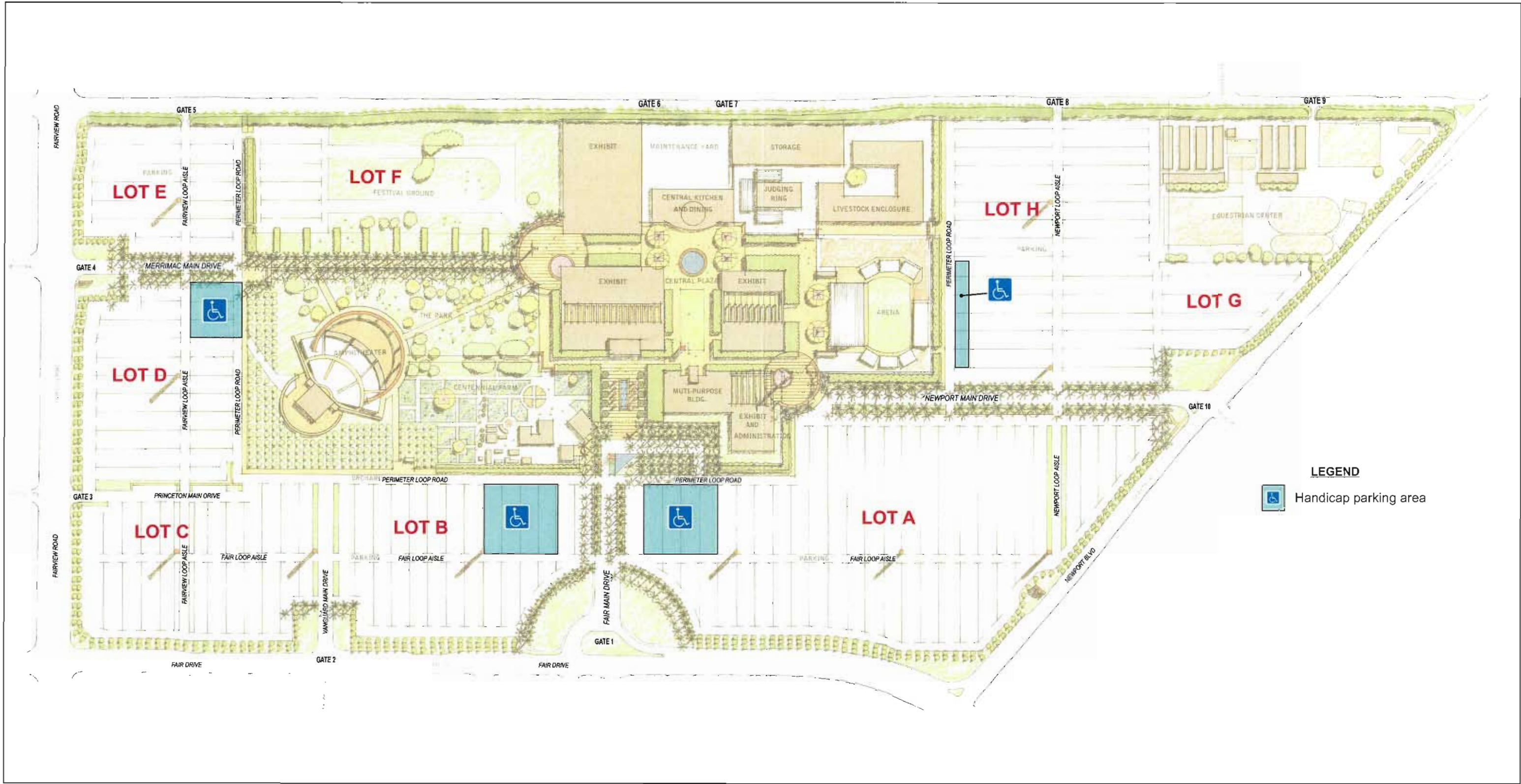
## EXITING/PICKUP PROCEDURES


Patrons will enter and leave the parking lots throughout the day. however, at day's end, the cones should be configured to allow exiting traffic to leave the site in an orderly fashion. As shown on the Signage Plan, exit routes are provided via Gates 1, 2, 4, 5, 8, and 10. The Fairview Loop Aisle, Fair Loop Aisle and Newport Loop Aisle should be configured for one-way traffic to ensure efficient on-site circulation to the nearest gate. Blue Crew Attendants should guide patrons to the nearest exit. Two way traffic should be accommodated along the Perimeter Loop Road, Fair Main Drive, and

Newport Main Drive. Access to the loading zone should be provided via Fair Main Drive and the Perimeter Loop Road.

## **PARKING LOT CLOSE**

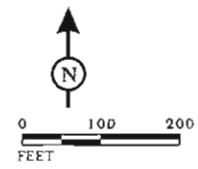
At day's end, each attendant is responsible for picking up and stacking the cones and barricades that are placed at his or her location. Similarly, all signs placed in the morning will be taken down and gathered for pick up. An attendant from each area will be responsible for returning the cones, barricades, and signs to the storage area.



**LEGEND**  
 Handicap parking area

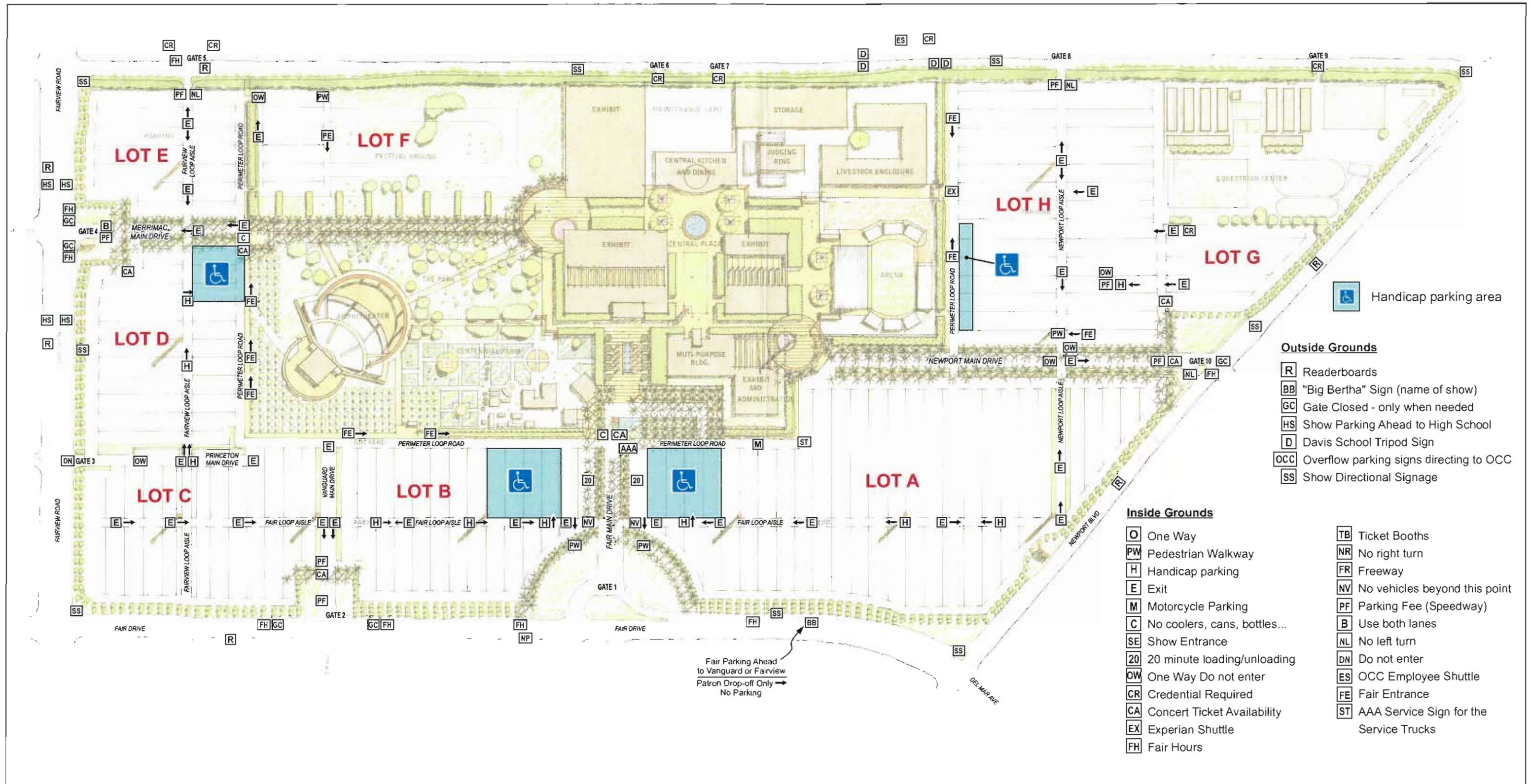
LSA

FIGURE 1



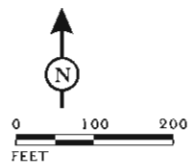
SOURCE: Orange County Fair & Exposition Center  
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Orange County Fair and Exposition Center  
 Site Plan



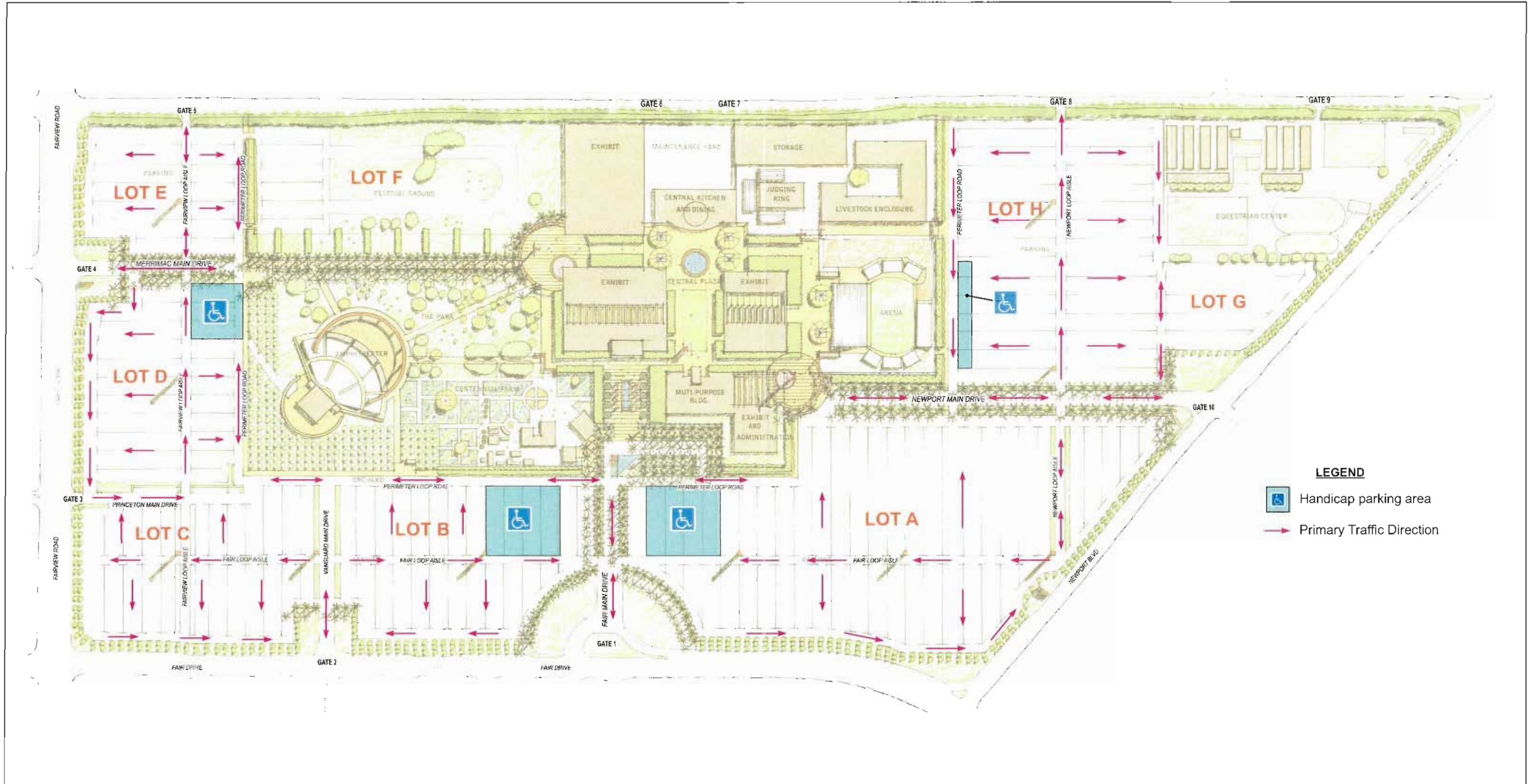
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FIGURE 3



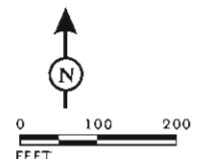
SOURCE: Orange County Fair & Exposition Center

Orange County Fair and Exposition Center  
Year-round Signage



LSA

FIGURE 4



SOURCE: Orange County Fair & Exposition Center

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Orange County Fair and Exposition Center  
Primary Circulation Patterns