



CITY OF COSTA MESA

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92628-1200

DEVELOPMENT SERVICES DEPARTMENT

November 13, 2014

Mr. Bob Hall, City Manager
City of Fountain Valley
10200 Slater Avenue
Fountain Valley, CA 92708

Subject: Draft Environmental Impact Report (SCH No. 2014091024) – Electronic Message Center Sign

Dear Mr. Hall:

Thank you for the opportunity to provide comments on the Draft EIR prepared for the proposed Electronic Message Center (EMC) Sign at 10955 Ellis Avenue.

Given the proximity of Costa Mesa residents to the proposed location and the proposed height of the message board, we strongly request that the City considers an alternative location or design with minimal impacts to the adjacent residential communities. We also encourage the City of Fountain Valley to provide a public notice to the residents who may be impacted within the State Streets.

Installation of a LED message board within such close proximity to residential living, will significantly impact the quality of life for these residents and should be carefully considered. Even though, the V-formed sign may be slightly angled to focus on freeway traffic, the light, glare and aesthetics impacts of the superior alternative are significant and should be further studied.

With respect to the draft EIR, please consider the following comments:

- Lower Height Alternative – the DEIR refers to an existing sign with a height of 60 feet across the freeway. It is not clear why this alternative was not the superior alternative given that the aesthetics impacts will be significantly less than the 79-foot high alternative. This option could also provide for tree installation and other methods of screening not considered in the DEIR. In addition, it appears that the sign is intended for general commercial advertisement and not to direct the motorist to a certain location in close proximity to the sign, and therefore distance visibility is not as critical as noted in the DEIR.
- V Formation Alternative – Section 7.7 of the DEIR refers to the V formation alternative environmentally superior to proposed sign with regards to aesthetics. The DEIR only considers light and glare and does not consider the height and massing of the sign; the sign appears significantly larger because of the angled panels and the gap between the two signs.
- Goals and Objectives – Section 2.3 of the DEIR refers to four goals including a goal to minimize environmental impacts on natural resources. This goal should be extended to include minimizing impacts to adjacent residential communities.
- Page 4-5 - Compliance with the Zoning Code – the DEIR refers that the proposed sign is in compliance with the zoning code. However, the City's zoning code is very restrictive with respect to commercial advertisement on a public site. It appears, that this proposal would be subject to a Zoning Code amendment to allow the increase in height from 60 feet to 79 feet and to allow advertisement on public property. The sign Code 21.25.050 currently specifies the following signs as permitted signs on public property:

(a) Government Signs. Traffic control and traffic directional signs erected by the city or another governmental entity; official notices required or authorized by law; signs placed in furtherance of governmental functions; signs on which the city expresses its message(s) to the public.

(b) Legal Nonconforming Signs. Permanent signs which were erected in the past on public property in conformance with all then-applicable laws, rules and regulations may remain in that same location so long as they have not been and are not expanded or moved, and are properly repaired and maintained.

If the City Council is intending to approve the EMC sign, we strongly recommend that the following conditions of approval be imposed:

- Height - Lowering the sign to a maximum of 31 feet to the illuminated portion.
- Consider a constant measuring factor similar to a maximum illumination of 300 nits luminance during times of operation. The proposed 0.3 foot-candle above ambient light at 250 feet from the face of the sign is very subjective and hard to monitor over time after final installation of the sign.
- Hours of Operation - Restricting the hours of operation from 7:00 AM to 10:00 PM with a gradual dimming starting at 9:00 PM
- Display – No flashing or animated displays or images should be permitted on the LED sign.
- Provide a landscape screen consisting of trees to shield sensitive uses from views of the sign to the extent that is feasible and practical.
- Compliance with Caltrans Requirements – In compliance with Outdoor Advertising Act and Regulations 2014 Edition, the message center displays are required to not illuminate resulting in flashing, intermittent, or moving light or motion that changes in intensity or exposes its message for less than four seconds.

These conditions are consistent with the SOCO EMC sign on the north side of the 405 Freeway including the height limitations. The SOCO sign was approved with a maximum height of 31 feet from the adjacent grade with a LED panel of 15 feet in height, which is considerably lower than the proposed sign.

We would appreciate the opportunity to review the staff reports and response to comments on the Draft Environmental Impact Report (DIER). Please feel free to contact Minoo Ashabi at 714/754-5610 with any questions.

Sincerely,



Gary Armstrong, AICP
Director of Economic & Development /
Deputy CEO

cc: City Council
CEO

Mr. Andrew Perea, Planning Director
City of Fountain Valley
10200 Slater Avenue
Fountain Valley, CA 92708