



Section 12.0:

Comments and Responses



SECTION 12.0

COMMENTS AND RESPONSES

12.1 CEQA REQUIREMENTS

Before approving a project, the California Environmental Quality Act (CEQA) requires the Lead Agency to prepare and certify a Final Environmental Impact Report (EIR).

In accordance with Sections 15120 through 15132 and Section 15161 of the *CEQA Guidelines*, the City of Fullerton has prepared an EIR for The Fullerton Plan (SCH #2011051019). The Response to Comments section, combined with the Draft EIR and Mitigation Monitoring Program, comprise the Final EIR.

The following is an excerpt from the *CEQA Guidelines*, Section 15132, Contents of Final Environmental Impact Report:

The Final EIR shall consist of:

- (a) The Draft EIR or a version of the draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.

This Comments and Responses section includes all of the above-required components and shall be attached to the Final EIR.

12.2 PUBLIC REVIEW PROCESS – DRAFT EIR

The Draft EIR was circulated for review and comment to the public, agencies, and organizations. The Draft EIR was also circulated to State agencies for review through the State Clearinghouse, Office of Planning and Research. The 45-day public review period ran from February 21, 2012 to April 5, 2012. Comments received during the 45-day public review period from the public and local and State agencies on the Draft EIR have been incorporated into this section.

12.3 FINAL EIR

The Final EIR allows the public and Lead Agency an opportunity to review revisions to the Draft EIR, the responses to comments, and other components of the EIR, such as the Mitigation



Monitoring Program, prior to approval of the project. The Final EIR serves as the environmental document to support a decision on the proposed project.

After completing the Final EIR, and before approving the project, the Lead Agency must make the following three certifications as required by Section 15090 of the *CEQA Guidelines*:

- That the Final EIR has been completed in compliance with CEQA;
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and
- That the Final EIR reflects the Lead Agency's independent judgment and analysis.

Additionally, pursuant to Section 15093(b) of the *CEQA Guidelines*, when a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final EIR, the agency must submit in writing its reasons for supporting the approved action. This Statement of Overriding Considerations is supported by substantial information in the record, which includes the Final EIR. Since the proposed project would result in significant, unavoidable impacts, the Lead Agency would be required to adopt a Statement of Overriding Considerations if it approves the proposed project.

These certifications, the Findings of Fact, and the Statement of Overriding Considerations are included in a separate Findings document. Both the Final EIR and the Findings will be submitted to the Lead Agency for consideration of the proposed project.

12.4 WRITTEN COMMENT LETTERS AND RESPONSES

All correspondence from those agencies or individuals commenting on the Draft EIR is reproduced on the following pages. The individual comments on each letter have been consecutively numbered for ease of reference. Following each comment letter are responses to each numbered comment. A response is provided for each comment raising significant environmental issues. Added or modified text is underlined (example), while deleted text will have a strike out (~~example~~) through the text, and is included in a box, as the example below shows.

"Text from EIR" "Text from EIR"

Comment Letters

A total of 18 written comment letters were received during the 45-day public review period.

- A. Department of Toxic Substances Control
- B. Department of Transportation
- C. City of La Habra
- D. Orange County Public Works



- E. Fullerton Joint Union High School District
- F. South Coast Air Quality Management District
- G. Southern California Association of Governments
- H. Airport Land Use Commission Orange County
- I. City of Anaheim
- J. City of Brea
- K. Diane Bonanno
- L. Friends of Harbors, Beaches, and Parks
- M. State of California Governor's Office of Planning and Research
- N. Orange County Transportation Authority
- O. Santa Ana Regional Water Quality Control Board
- P. Orange County Sanitation District
- Q. State of California Governor's Office of Planning and Research
- R. Jane Reifer



Department of Toxic Substances Control

COMMENT LETTER A



Matthew Rodriguez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

March 21, 2012

**COMMUNITY
DEVELOPMENT**

MAR 22 2012

DEPARTMENT

Ms. Heather Allen, AICP, Planning Manager
City of Fullerton
303 West Commonwealth Avenue
Fullerton, California 92832
HeatherA@ci.fullerton.ca.us

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE FULLERTON PLAN PROJECT (SCH #2011051019), ORANGE COUNTY

Dear Ms. Allen:

The Department of Toxic Substances Control (DTSC) has received your submitted draft Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document: "The Fullerton Plan (General Plan Update) is a comprehensive update of the 1996 General Plan. The City of Fullerton (City) encompasses approximately 14,376 acres (approximately 22.3 square miles) within an urbanized portion of north Orange County. The Fullerton Plan has identified 12 Focus Areas within which to concentrate potential change through community-led planning processes. The City of Fullerton is located within the northern portion of Orange County, California. The City is bordered by the cities La Mirada, La Habra, and Brea to the north, unincorporated County of Orange and City of Anaheim to the south, Cities of Yorba Linda and Placentia to the east, and unincorporated County of Orange and cities of La Mirada and Buena Park to the west. The majority of the nonresidential land uses are Light Industrial. Approximately 709 acres of vacant land, which is interspersed throughout the City remains".

Based on the review of the submitted document DTSC has the following comments:

- 1) DTSC provided comments on the project original Notice of Preparation (NOP) on June 7, 2011; some of those comments have been addressed in the submitted draft EIR. Please ensure that all those comments will be addressed in the final Environmental Impact Report for the project.
- 2) DTSC's EnviroStor search results indicate that there are 16 cleanup active sites and 8 Hazardous Waste permitted facilities within the City of Fullerton.
- 3) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a

A1

A2

A3

Ms. Heather Allen
March 21, 2012
Page 2

Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

A3

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov, or by phone at (714) 484-5491.

Sincerely,



Greg Holmes
Unit Chief
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov.

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
Attn: Nancy Ritter
nritter@dtsc.ca.gov

CEQA # 3471



A. RESPONSES TO COMMENTS FROM GREG HOLMES, UNIT CHIEF, DEPARTMENT OF TOXIC SUBSTANCES CONTROL, DATED MARCH 21, 2012.

- A1. The comment states that some of the comments provided on the Notice of Preparation have been addressed and requests that all comments will be addressed in the Final EIR. The comment letter does not identify specifically which NOP comments were found not to be addressed in the Draft EIR. Because this project entails an update to the General Plan and proposes no specific development project, the Draft EIR appropriately took a citywide approach as opposed to site-specific project level approach to environmental analysis. Until the individual footprints of development projects are proposed, it is difficult to determine the precise nature, location, and severity of contamination that may exist within any specific “project area”. Where applicable, Draft EIR Section 5.9, Hazards and Hazardous Materials, addresses the comments provided in response to the NOP. Draft EIR pages 5.9-12 through 5.9-19 evaluate whether conditions within the project area may pose a threat to human health or the environment. The Draft EIR identifies existing conditions within the project area, including listed regulatory sites and their current status (Pages 5.9-15 through 5.9-18 summarize the results of the regulatory databases searched). Draft EIR pages 5.9-1 through 5.9-12 identify the Federal, State, and local regulatory policies and law that apply to hazards and hazardous materials. Further, the analysis identifies the potential of human exposure to hazardous substance in the event of an accidental release. The Fullerton Plan does not propose site-specific development at this time. Identification of site-specific hazards, including environmental investigations, would be conducted on a project-by-project basis. In accordance with Mitigation Measures HAZ-1, the City will require individual development projects to confirm the presence or absence of hazardous materials pertaining to the release of hazardous materials into the soil, surface water, and/or groundwater. If necessary, the development shall undergo site characterization and remediation on a project-by-project basis, per applicable Federal, State, and/or local standards and guidelines set by the applicable regulatory agency.
- A2. The comment is acknowledged. No further response is necessary.
- A3. The comment is acknowledged. No further response is necessary.

DEPARTMENT OF TRANSPORTATION

District 12
 3337 Michelson Drive, Suite 380
 Irvine, CA 92612-8894
 Tel: (949) 724-2000
 Fax: (949) 724-2592



*Flex your power!
 Be energy efficient!*

FAX & MAIL

March 29, 2012

Heather Allen, AICP
 Planning Manager
 City of Fullerton
 303 West Commonwealth Avenue
 Fullerton, CA 92832

File: IGR/CEQA
 SCH# 2011051019
 Log #: 2952
 SR-91,57 and I-5

Subject: The Fullerton Plan Environmental Impact Report

Dear Ms. Allen,

Thank you for the opportunity to review and comment on the proposed project which would result in the Fullerton Plan (General Plan Update) a comprehensive update of the 1996 General Plan. The purpose of the plan is to provide the entire community with a comprehensive and internally consistent plan to guide the City's decision making and development processes through to the General Plan Horizon Year (2030). The work program includes a comprehensive update of the General Plan baseline data, goals and policies, a Bicycle Master Plan, and Climate Action Plan (CAP).

The nearest State Routes to the project are SR-91, 57 and I-5.

The California Department of Transportation (Department), District 12 is a commenting agency on this project and has the following comments:

1. The Department's Traffic Operations Branch requests all applicants to use the method outlined in the latest version of the Highway Capacity Manual (HCM) when analyzing traffic impacts on State Transportation Facilities. The use of HCM is preferred by the Department because it is an operational analysis as opposed to the Intersection Capacity Utilization (ICU) method, which is a planning analysis. In the case of projects that have direct impacts on State Facilities, the Department recommends that the traffic impact analysis be based on HCM method. Should the project require an encroachment permit, Traffic Operations may find the Traffic Impact Study based on ICU methodology inadequate resulting in possible delay or denial of a permit by the Department. All input sheets, assumptions and volumes on State Facilities including ramps and intersection analysis should be submitted to the Department for review and approval.

B1

The traffic impact on the state transportation system should be evaluated based on the Department's Guide for the Preparation of Traffic Impact Studies which is available at: <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>. Please ensure the EIR includes appropriate mitigation measures to offset any potential impacts.

B1

2. Provide necessary analysis for the following facilities: Mainline freeway segments, weaving areas, ramps and ramp junctions per Caltrans' Guide for the Preparation of Traffic Impact Studies. The analysis should be included to properly determine impacts on the State Highway system as a result the build-out to the General Plan. If there are impacts on the State facilities mitigation should be considered.

B2

3. The intersection analysis uses base saturation flow rates rather than adjusted rates. The use of base saturation flow rates may result in intersection delays/LOS that are not reflective of actual conditions. The Highway Capacity Manual (HCM) provides Equation 16-4 to determine saturation flow rate. Saturation flow rates can also be determined by field measurements as presented in Appendix H of the HCM. Include in the report effects of pedestrian traffic at the signalized intersections and provide counts for each analysis.

B3

4. Pedestrian and bicycle counts have not been included in the submittal nor are they included in the intersection analysis. Since the goal is to include other modes of transportation, these two modes should be included in the analysis. The presence of pedestrians and bicycles can impact the operation of intersections with regards to right and left turn motor vehicle movements.

B4

5. The City of Fullerton has initiated the process of removing Nutwood Avenue from the MPAH. Please include this discussion in the document.

B5

6. Provide figures/diagrams depicting the volume generated at intersections as a result of this build-out.

B6

7. On Page 28 of the Traffic Impact Analysis indicates "The number of trips that could be expected to be generated by the potential development identified in the Focus Areas was calculated and is summarized in detail in the Appendices to this report". The appendices do not provide such information. Please provide this information, also include internal capture and pass-by trip reduction calculations. Additionally include the type and amount of intensities for each of the Focus Areas such as Single Family Units and number of units that was used in the trip generation.

B7

8. Indicate which edition of the ITE Trip Generation has been used in the analysis? Also, provide the corresponding ITE land use codes used.

B8

Please continue to keep us informed of this project and any future developments, which could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Farhad Edward Khosravi at ed_khosravi@dot.ca.gov or (949) 724-2338.

Sincerely,



Christopher Herre, Branch Chief
Local Development/Intergovernmental Review



B. RESPONSES TO COMMENTS FROM CHRISTOPHER HERRE, BRANCH CHIEF, CALIFORNIA DEPARTMENT OF TRANSPORTATION, DATED MARCH 29, 2012

B1. As indicated in Draft EIR Section 5.4, *Traffic and Circulation*, the study intersections, including State transportation facilities, were analyzed using the Highway Capacity Manual (HCM) methodology for signalized intersections, consistent with the Departments recommended methodology.

B2. The Fullerton Plan Draft EIR assesses the overall environmental effects of The Fullerton Plan at a program level of detail. The program EIR generally analyzes the broad environmental effects of The Fullerton Plan, and provides a baseline against which future projects implemented are evaluated. For future projects, impact analysis will focus on site-specific issues that cannot otherwise be addressed at a program or policy level of analysis.

At the time that any future focused planning efforts for The Fullerton Plan Focus Areas are undertaken, any project that would contribute measurable traffic to the freeway system would be required to provide the appropriate analysis for freeway mainline segments, weaving, and freeway ramps, per the Caltrans Guide for the Preparation of Traffic Impact Studies (December, 2002). Mitigation Measure TR-3 will be added to the Final EIR, as follows:

TR-3 In conjunction with preparation of any multi-modal analysis as required in Mitigation Measure TR-1, any project that would contribute measurable traffic to the freeway system shall prepare an analysis to determine potential impacts to freeway mainline segments, weaving, and freeway ramps, per the Caltrans Guide for the Preparation of Traffic Impact Studies. Mitigation measures shall be identified to reduce impacts to less than significant levels.

B3. The saturation flow rates used in the analyses are based on field measurements taken by the City over the years on the major corridors within the City of Fullerton. The measurements and calculations were conducted as part of multiple signal coordination timing projects.

B4. Because this project entails an update to the General Plan and proposes no specific development project, the Draft EIR appropriately took a citywide approach as opposed to site-specific project level approach to the analysis. A multi-modal analysis provides a detailed evaluation of the mobility environment for the automobile driver, transit rider, bicyclist, and pedestrian at an individual street segment level. This type of analysis would not be done at a citywide level, but rather, would be focused on a specific development proposal and the street system surrounding the project site. Prior to approval of any General Plan Amendment and/or Zone Change associated with the focused planning efforts for The Fullerton Plan Focus Areas, a detailed multi-modal analysis will be required in order to determine specific impacts associated with the proposed project, and where applicable, identify mitigation measures to reduce impacts to less than significant levels based on City adopted multi-modal thresholds. And where



mitigation is found to be needed, alternative mitigation in lieu of capacity improvements would be encouraged (Mitigation Measure TR-1).

- B5. A portion of Nutwood Avenue is proposed to be converted to a pedestrian mall within Cal State Fullerton as part of the CollegeTown proposal. This proposal is currently being studied, but is not yet approved or adopted by the City of Fullerton or by the Orange County Transportation Agency (OCTA). Therefore, Nutwood Avenue and all other arterials in the City were evaluated in the Draft EIR as they are currently approved and adopted on the City's Circulation Element and the County's Master Plan of Arterial Highways (MPAH).
- B6. Peak hour turning movement volumes for all study intersections and for each analysis scenario are provided on the intersection analysis worksheets in the technical appendix of the Draft EIR.
- B7. Draft EIR Table 5.4-8, *Focus Area Peak Hour Trip Generation*, provides a summary of the trips that could be expected to be generated by the potential development identified in the Focus Areas. A copy of the trip generation calculation tables for each traffic analysis zone for the focus areas is attached.
- B8. Trip generation rates are based on the Institute of Transportation Engineers (ITE) Trip Generation (8th Edition). The ITE land use codes are included with the trip generation tables.

FULLERTON GENERAL PLAN UPDATE - TRIP GENERATION BY TRAFFIX ZONES

WEST COYOTE HILLS		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ 2	Sub-Areas A			In	Out	Total	In	Out	Total
		Residential	7273	143	428	570	484	284	768
		Commercial	2918	41	27	68	124	129	253
		Office	0	0	0	0	0	0	0
		Industrial	0	0	0	0	0	0	0
		Church	-93	-4	-2	-6	-3	-3	-6
		Education	0	0	0	0	0	0	0
		Govt Facilities	132	16	2	19	3	15	18
		Internal Cap.	-512	-10	-23	-33	-30	-21	-52
		Pass-by					-42	-44	-86
		Total	9718	186	432	618	536	360	895

TRANSPORTATION CTR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ 72	Sub-Areas A			In	Out	Total	In	Out	Total
		Residential	10374	159	636	796	629	339	967
		Commercial	9447	134	86	220	402	419	821
		Office	1101	136	19	155	25	124	149
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Internal Cap.	-2511	-51	-89	-141	-127	-106	-232
		Pass-by					-137	-142	-279
		Total	18411	378	652	1030	792	634	1426

AIRPORT INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ 10	Sub-Areas A*,B,F			In	Out	Total	In	Out	Total
		Residential	328	5	21	25	19	10	29
		Commercial	959	14	9	22	41	42	83
		Office	527	65	9	74	12	59	71
		Industrial	212	25	4	28	4	26	29
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Internal Cap.	-219	-10	-5	-15	-9	-14	-22
		Pass-by					-14	-14	-28
		Total	1807	99	38	134	53	109	162

AIRPORT INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ 11	Sub-Areas C			In	Out	Total	In	Out	Total
		Residential	0	0	0	0	0	0	0
		Commercial	-310	-4	-3	-7	-13	-14	-27
		Office	435	54	7	61	10	49	59
		Industrial	-406	-47	-6	-54	-7	-50	-56
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Internal Cap.							
		Pass-by					4	5	9
		Total	-281	3	-2	0	-6	-10	-15

AIRPORT INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ 12	Sub-Areas D			In	Out	Total	In	Out	Total
		Residential	0	0	0	0	0	0	0
		Commercial	-2348	-33	-21	-55	-100	-104	-204
		Office	1155	143	20	163	27	130	156
		Industrial	537	62	9	71	9	66	75
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Internal Cap.							
		Pass-by					34	35	69
		Total	-656	172	8	179	-30	127	96

AIRPORT INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
13	E	Residential	256	5	15	20	16	9	26
		Commercial	174	2	2	4	7	8	15
		Office	374	46	6	53	9	42	51
		Industrial	82	10	1	11	1	10	11
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Internal Cap.	-44	-3	-1	-4	-2	-3	-5
		Pass-by					-2	-3	-5
		Total	842	60	23	84	29	63	93

CIVIC CENTER		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
21	A	Residential	278	4	17	21	16	9	25
		Commercial	85	1	1	2	4	4	7
		Office	214	26	4	30	5	24	29
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	577	31	22	53	25	37	61
		Internal Cap.	-29	-2	-1	-3	-1	-2	-3
		Pass-by					-1	-1	-2
		Total	548	29	21	50	23	34	56

CIVIC CENTER		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
22	B & C	Residential	366	5	22	28	22	12	34
		Commercial	5590	79	51	130	238	248	485
		Office	493	61	8	69	12	55	67
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	6449	145	81	227	272	315	586
		Internal Cap.	-316	-7	-4	-10	-13	-15	-29
		Pass-by					-81	-84	-165
		Total	6133	138	77	217	178	216	392

CIVIC CENTER		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
23	D,E,F(50%)	Residential	1039	17	65	81	64	35	98
		Commercial	2777	39	25	65	119	123	242
		Office	959	118	16	135	22	108	129
		Industrial	-100	-12	-2	-13	-2	-12	-14
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	4675	162	104	268	203	254	455
		Internal Cap.	-221	-7	-5	-11	-10	-12	-21
		Pass-by					-40	-42	-82
		Total	4454	155	99	257	153	200	352

CIVIC CENTER		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
27	F(50%),[C	Residential	262	4	16	20	16	9	24
		Commercial	2725	39	25	63	116	121	237
		Office	554	69	9	78	13	62	75
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	3541	112	50	161	145	192	336
		Internal Cap.	-178	-6	-3	-8	-8	-10	-17
		Pass-by					-39	-41	-81
		Total	3363	106	47	153	98	141	238

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
26	A(80%), B,	Residential	115	2	7	9	7	5	12
		Commercial	-415	-6	-4	-10	-17	-19	-37
		Office	90	11	2	13	2	10	12
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	22	3	0	3	1	3	3
		Sub-Total	-188	10	5	15	-7	-1	-10
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					6	6	13
		Total	-188	10	5	15	-1	5	3

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
25	E(50%), C	Residential	-71	-1	-5	-5	-4	-3	-7
		Commercial	1423	20	13	33	61	63	124
		Office	193	24	4	27	5	22	26
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	2	0	0	0	0	0	0
		Sub-Total	1547	43	12	55	62	82	143
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					-21	-21	-42
		Total	1547	43	12	55	41	61	101

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
24	E(50%), F	Residential	56	-2	4	4	2	0	1
		Commercial	1344	19	12	31	57	60	117
		Office	622	77	11	87	15	70	84
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2022	94	27	122	74	130	202
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					-19	-20	-40
		Total	2022	94	27	122	55	110	162

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
15	[OCN(K(50	Residential	1326	22	81	101	82	45	127
		Commercial	-188	-3	-2	-5	-8	-9	-16
		Office	1062	132	18	150	24	119	144
		Industrial	-69	-8	-1	-9	-1	-8	-10
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2131	143	96	237	97	147	245
		Internal Cap.	-165	-5	-3	-7	-7	-9	-15
		Pass-by					3	3	5
		Total	1966	138	93	230	93	141	235

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
14	[OCN(K(50	Residential	914	15	57	69	56	30	83
		Commercial	-345	-4	-3	-9	-14	-15	-30
		Office	864	107	15	121	20	97	117
		Industrial	-41	-5	-1	-5	-1	-5	-6
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	21	3	0	3	0	2	3
		Sub-Total	1413	116	68	179	61	109	167
		Internal Cap.	-185	-6	-3	-10	-8	-10	-18
		Pass-by					5	5	10
		Total	1228	110	65	169	58	104	159

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
55	K(50%)	Residential	183	4	12	14	11	7	18
		Commercial	-2	0	0	0	0	0	0
		Office	49	6	1	7	1	6	7
		Industrial	-8	-1	0	-1	0	-1	-1
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	222	9	13	20	12	12	24
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by				0	0	0	0
		Total	222	9	13	20	12	12	24

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
56	K(50%),J(50%)	Residential	223	4	14	17	14	8	21
		Commercial	2	0	0	0	0	0	0
		Office	151	19	3	21	3	17	20
		Industrial	-21	-3	0	-3	0	-3	-3
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	7	1	0	1	0	1	1
		Sub-Total	362	21	17	36	17	23	39
		Internal Cap.	-7	-1	0	-1	0	-1	-1
		Pass-by				0	0	0	0
		Total	355	20	17	35	17	22	38

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
57	J(45%)	Residential	367	6	23	28	23	12	34
		Commercial	32	0	0	1	1	1	3
		Office	914	113	15	129	21	103	124
		Industrial	-123	-14	-2	-16	-2	-15	-17
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	62	8	1	9	1	7	8
		Sub-Total	1252	113	37	151	44	108	152
		Internal Cap.	-63	-6	-2	-8	-2	-5	-8
		Pass-by				0	0	-1	-1
		Total	1189	107	35	143	42	103	143

COMMONWEALTH CORRIDOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
58	J(35%)	Residential	286	5	18	22	18	9	27
		Commercial	25	0	0	1	1	1	2
		Office	711	88	12	100	16	80	96
		Industrial	-96	-11	-1	-13	-2	-12	-13
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	48	6	1	7	1	5	6
		Sub-Total	974	88	30	117	34	83	118
		Internal Cap.	-49	-5	-1	-6	-2	-4	-6
		Pass-by				0	0	-1	-1
		Total	925	83	29	111	32	79	111

DOWNTOWN		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
16	A*,B,C,H,I	Residential	4587	72	280	352	282	155	435
		Commercial	15	0	1	1	1	1	1
		Office	2442	302	41	344	57	274	331
		Industrial	-262	-30	-4	-35	-4	-32	-37
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	39	5	1	6	1	4	5
		Sub-Total	6821	349	319	668	337	402	735
		Internal Cap.	-491	-7	-14	-22	-24	-20	-43
		Pass-by				0	0	0	0
		Total	6330	342	305	646	313	382	692

DOWNTOWN		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
17	F*	Residential	0	0	0	0	0	0	
		Commercial	0	0	0	0	0	0	
		Office	0	0	0	0	0	0	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	0	0	0	0	0	0	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				0	0	0	
		Total	0	0	0	0	0	0	

DOWNTOWN		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
18	D	Residential	0	0	0	0	0	0	
		Commercial	-29	0	-1	-1	-1	-3	
		Office	11	1	2	0	1	2	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	9487	670	837	251	586	837	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	9469	671	838	250	586	836	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				0	0	1	
		Total	9469	671	838	250	586	837	

DOWNTOWN		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
19	G*	Residential	0	0	0	0	0	0	
		Commercial	0	0	0	0	0	0	
		Office	0	0	0	0	0	0	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	0	0	0	0	0	0	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				0	0	0	
		Total	0	0	0	0	0	0	

DOWNTOWN		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
20	E	Residential	1690	25	129	101	54	155	
		Commercial	-217	-3	-5	-9	-10	-19	
		Office	117	14	16	3	13	16	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	1590	36	140	95	57	152	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				3	3	6	
		Total	1590	36	140	98	60	158	

EDUCATION		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
28	A(95%)	Residential	42	1	3	3	1	4	
		Commercial	267	4	7	11	11	23	
		Office	-293	-36	-41	-7	-33	-40	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	16	-31	-31	7	-21	-13	
		Internal Cap.	-2	4	4	-1	3	2	
		Pass-by				-4	-4	-8	
		Total	14	-27	-27	2	-22	-19	

EDUCATION		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
29	B*	Residential	0	0	0	0	0	0	
		Commercial	0	0	0	0	0	0	
		Office	0	0	0	0	0	0	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	0	0	0	0	0	0	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				0	0	0	
		Total	0	0	0	0	0	0	

EDUCATION		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
30	C	Residential	1367	22	83	105	85	46	132
		Commercial	510	7	5	12	22	23	44
		Office	0	0	0	0	0	0	0
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	1877	29	88	117	107	69	176
		Internal Cap.	-94	-1	-4	-6	-5	-3	-9
		Pass-by					-7	-8	-15
		Total	1783	28	84	111	95	58	152

EDUCATION		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
31	D*	Residential	0	0	0	0	0	0	
		Commercial	0	0	0	0	0	0	
		Office	0	0	0	0	0	0	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	0	0	0	0	0	0	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				0	0	0	
		Total	0	0	0	0	0	0	

EDUCATION		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
32	E(25%),F(Residential	1385	21	85	106	84	45	130
		Commercial	1333	19	12	31	57	59	116
		Office	430	53	7	60	10	48	58
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	3148	93	104	197	151	152	304
		Internal Cap.	-409	-14	-11	-24	-18	-21	-40
		Pass-by					-19	-20	-39
		Total	2739	79	93	173	114	111	225

EDUCATION		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
33	E(75%),F(5	Residential	2340	36	143	180	142	76	219
		Commercial	3466	49	31	81	147	154	301
		Office	1069	133	18	150	25	120	145
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	6875	218	192	411	314	350	665
		Internal Cap.	-1100	-37	-26	-63	-48	-59	-107
		Pass-by					-50	-52	-102
		Total	5775	181	166	348	216	239	456

EDUCATION		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
34	F(10%)	Residential	259	4	16	20	16	9	24
		Commercial	76	1	1	2	3	3	7
		Office	31	4	1	4	1	4	4
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	366	9	18	26	20	16	35
		Internal Cap.	-18	-1	-1	-1	-1	-1	-2
		Pass-by					-1	-1	-2
		Total	348	8	17	25	18	14	31

EDUCATION		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
35	A(5%),H,G	Residential	2940	45	180	226	177	96	274
		Commercial	11059	158	100	257	470	490	960
		Office	6375	789	108	897	146	716	863
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	20374	992	388	1380	793	1302	2097
		Internal Cap.	-1279	-53	-31	-84	-54	-75	-128
		Pass-by					-160	-167	-326
		Total	19095	939	357	1296	579	1060	1643

HARBOR GATEWAY		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
49	D,E(50%),F	Residential	3035	46	188	233	182	97	279
		Commercial	864	12	8	20	36	39	75
		Office	475	59	8	67	11	53	64
		Industrial	44	5	1	6	1	6	6
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	4418	122	205	326	230	195	424
		Internal Cap.	-342	-10	-14	-23	-17	-15	-33
		Pass-by					-12	-13	-26
		Total	4076	112	191	303	201	167	365

HARBOR GATEWAY		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
50	E(50%),F(2)	Residential	1420	22	87	109	86	48	133
		Commercial	659	10	6	15	28	30	57
		Office	475	59	8	67	11	53	64
		Industrial	44	5	1	6	1	6	6
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2598	96	102	197	126	137	260
		Internal Cap.	-207	-8	-6	-13	-9	-11	-21
		Pass-by					-10	-10	-19
		Total	2391	88	96	184	107	116	220

HARBOR GATEWAY		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
51	C,F(50%)	Residential	2061	32	126	158	126	68	193
		Commercial	848	12	8	20	36	38	74
		Office	235	29	4	33	6	27	32
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	3144	73	138	211	168	133	299
		Internal Cap.	-326	-10	-8	-18	-15	-17	-31
		Pass-by					-12	-13	-25
		Total	2818	63	130	193	141	103	243

HARBOR GATEWAY		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
52	H	Residential	3337	51	205	256	202	109	311
		Commercial	7727	110	70	180	329	342	671
		Office	2225	276	38	313	51	250	301
		Industrial	-71	-8	-1	-9	-1	-9	-10
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	13218	429	312	740	581	692	1273
		Internal Cap.	-2644	-86	-62	-148	-116	-138	-255
		Pass-by					-112	-116	-228
		Total	10574	343	250	592	353	438	790

HARBOR GATEWAY		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
53	A*,B	Residential	3561	56	217	274	218	119	337
		Commercial	9217	131	84	215	392	408	801
		Office	2323	288	39	327	53	261	314
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	15101	475	340	816	663	788	1452
		Internal Cap.	-3020	-95	-68	-163	-133	-158	-290
		Pass-by					-133	-139	-272
		Total	12081	380	272	653	397	491	890

HARBOR GATEWAY		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
54	I,J*	Residential	3600	55	221	276	218	117	336
		Commercial	10577	150	96	246	450	469	919
		Office	2434	302	41	343	56	273	329
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	16611	507	358	865	724	859	1584
		Internal Cap.	-3322	-101	-72	-173	-145	-172	-317
		Pass-by					-153	-159	-312
		Total	13289	406	286	692	426	528	955

NORTH HARBOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
4	B(30%)	Residential	465	7	29	36	28	15	43
		Commercial	1010	14	9	23	43	45	88
		Office	1904	236	32	268	44	214	258
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	3379	257	70	327	115	274	389
		Internal Cap.	-406	-31	-8	-39	-14	-33	-47
		Pass-by					-15	-15	-30
		Total	2973	226	62	288	86	226	312

NORTH HARBOR		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
5	A,B(15%)	Residential	283	4	17	22	17	10	27
		Commercial	348	5	4	8	14	15	30
		Office	1408	174	24	198	32	158	191
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2039	183	45	228	63	183	248
		Internal Cap.	-203	-15	-4	-20	-7	-17	-23
		Pass-by					-5	-5	-10
		Total	1836	168	41	208	51	161	215

NORTH HARBOR			AM PEAK HOUR			PM PEAK HOUR			
TAZ	Sub-Areas	Land Use	Daily	In	Out	Total	In	Out	Total
6	B(30%)	Residential	465	7	29	36	28	15	43
		Commercial	1010	14	9	23	43	45	88
		Office	1904	236	32	268	44	214	258
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	3379	257	70	327	115	274	389
		Internal Cap.	-406	-31	-8	-39	-14	-33	-47
		Pass-by					-15	-15	-30
		Total	2973	226	62	288	86	226	312

NORTH HARBOR			AM PEAK HOUR			PM PEAK HOUR			
TAZ	Sub-Areas	Land Use	Daily	In	Out	Total	In	Out	Total
7	B(25%)	Residential	387	6	24	30	24	13	36
		Commercial	842	12	8	20	36	37	73
		Office	1587	197	27	223	37	178	215
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2816	215	59	273	97	228	324
		Internal Cap.	-338	-26	-7	-33	-12	-28	-39
		Pass-by					-12	-13	-25
		Total	2478	189	52	240	73	187	260

NORTH HARBOR			AM PEAK HOUR			PM PEAK HOUR			
TAZ	Sub-Areas	Land Use	Daily	In	Out	Total	In	Out	Total
8	C(50%)	Residential	-1	0	0	0	0	0	0
		Commercial	1313	19	12	31	56	58	114
		Office	657	82	11	93	15	74	89
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	1969	101	23	124	71	132	203
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					-19	-20	-39
		Total	1969	101	23	124	52	112	164

NORTH HARBOR			AM PEAK HOUR			PM PEAK HOUR			
TAZ	Sub-Areas	Land Use	Daily	In	Out	Total	In	Out	Total
9	C(50%)	Residential	-1	0	0	0	0	0	0
		Commercial	1313	19	12	31	56	58	114
		Office	657	82	11	93	15	74	89
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	1969	101	23	124	71	132	203
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					-19	-20	-39
		Total	1969	101	23	124	52	112	164

NORTH INDUSTRIAL			AM PEAK HOUR			PM PEAK HOUR			
TAZ	Sub-Areas	Land Use	Daily	In	Out	Total	In	Out	Total
1	A,B,C,D,E	Residential	7592	117	465	583	459	248	707
		Commercial	15579	222	142	363	664	690	1354
		Office	8923	1105	152	1256	206	1003	1208
		Industrial	1264	147	19	167	22	155	175
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	33358	1591	778	2369	1351	2096	3444
		Internal Cap.	-6113	-226	-132	-359	-258	-342	-601
		Pass-by					-226	-235	-460
		Total	27245	1365	646	2010	867	1519	2383

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
59	J(10%)*	Residential	0	0	0	0	0	0	
		Commercial	0	0	0	0	0	0	
		Office	0	0	0	0	0	0	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	0	0	0	0	0	0	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				0	0	0	
		Total	0	0	0	0	0	0	

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
60	J(40%)*	Residential	0	0	0	0	0	0	
		Commercial	0	0	0	0	0	0	
		Office	0	0	0	0	0	0	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	0	0	0	0	0	0	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				0	0	0	
		Total	0	0	0	0	0	0	

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
61	B(50%)	Residential	-2	0	0	0	0	0	
		Commercial	2157	31	20	50	92	188	
		Office	79	10	2	11	2	11	
Same for TAZ 67[sub-area		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	2234	41	22	61	94	199	
		Internal Cap.	0	0	0	0	0	0	
		Pass-by				-31	-33	-64	
		Total	2234	41	22	61	63	135	

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
62	E(55%)	Residential	723	11	45	56	44	68	
		Commercial	3420	48	31	80	146	297	
		Office	580	72	10	81	13	79	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	4723	131	86	217	203	444	
		Internal Cap.	-567	-16	-10	-26	-24	-53	
		Pass-by				-50	-52	-101	
		Total	4156	115	76	191	129	290	

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
63	E(45%)	Residential	592	9	36	45	36	55	
		Commercial	2799	40	25	65	119	243	
		Office	474	59	8	67	11	64	
		Industrial	0	0	0	0	0	0	
		Church	0	0	0	0	0	0	
		Education	0	0	0	0	0	0	
		Govt Facilities	0	0	0	0	0	0	
		Sub-Total	3865	108	69	177	166	362	
		Internal Cap.	-464	-13	-9	-21	-20	-44	
		Pass-by				-40	-42	-83	
		Total	3401	95	60	156	106	235	

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
64	H(50%),I(5	Residential	320	5	20	25	20	10	30
		Commercial	2090	30	19	49	89	93	182
		Office	156	20	3	22	4	18	21
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2566	55	42	96	113	121	233
		Internal Cap.	-173	-5	-3	-8	-8	-9	-16
		Pass-by					-30	-32	-62
		Total	2393	50	39	88	75	80	155

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
65	H(50%),I(5	Residential	320	5	20	25	20	10	30
		Commercial	2090	30	19	49	89	93	182
		Office	156	20	3	22	4	18	21
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2566	55	42	96	113	121	233
		Internal Cap.	-173	-5	-3	-8	-8	-9	-16
		Pass-by					-30	-32	-62
		Total	2393	50	39	88	75	80	155

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
66	L*	Residential	0	0	0	0	0	0	0
		Commercial	0	0	0	0	0	0	0
		Office	0	0	0	0	0	0	0
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	0	0	0	0	0	0	0
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					0	0	0
		Total	0	0	0	0	0	0	0

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
67	A, B(50%)	Residential	-3	0	0	0	0	0	-1
		Commercial	2696	39	25	63	115	120	234
Same for TAZ 61[sub-area		Office	99	12	2	14	3	11	14
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2792	51	27	77	118	131	247
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					-39	-41	-80
		Total	2792	51	27	77	79	90	167

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
68	C(60%),D*	Residential	434	7	26	34	27	14	42
		Commercial	3484	49	32	81	148	154	302
		Office	192	24	3	27	4	22	26
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	4110	80	61	142	179	190	370
		Internal Cap.	-493	-10	-7	-17	-22	-23	-44
		Pass-by					-50	-52	-103
		Total	3617	70	54	125	107	115	223

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
69	C(40%)	Residential	290	5	18	22	18	10	28
		Commercial	2323	33	21	54	99	103	202
		Office	128	16	2	18	3	14	17
		Industrial	0	0	0	0	0	0	0
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2741	54	41	94	120	127	247
		Internal Cap.	-329	-6	-5	-11	-14	-15	-30
		Pass-by				-34	-35	-69	
		Total	2412	48	36	83	72	77	148

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
70	G(50%)	Residential	989	15	61	76	60	33	92
		Commercial	1087	16	10	26	47	48	95
		Office	208	26	4	30	5	24	28
		Industrial	0	0	0	0	0	0	0
Same for TAZ 71	[sub-area]	Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2284	57	75	132	112	105	215
		Internal Cap.	-274	-7	-9	-16	-14	-13	-26
		Pass-by				-16	-16	-32	
		Total	2010	50	66	116	82	76	157

ORANGETHORPE CORRIDOR NODES		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
71	G(50%)	Residential	989	15	61	76	60	33	92
		Commercial	1087	16	10	26	47	48	95
		Office	208	26	4	30	5	24	28
		Industrial	0	0	0	0	0	0	0
Same for TAZ 70	[sub-area]	Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2284	57	75	132	112	105	215
		Internal Cap.	-274	-7	-9	-16	-14	-13	-26
		Pass-by				-16	-16	-32	
		Total	2010	50	66	116	82	76	157

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
36	C(23%)	Residential	23	0	1	2	1	1	2
		Commercial	201	3	2	5	9	9	17
		Office	-3	0	0	0	0	0	0
		Industrial	380	44	6	50	6	46	53
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	601	47	9	57	16	56	72
		Internal Cap.	-72	-6	-1	-7	-2	-7	-9
		Pass-by				-3	-3	-6	
		Total	529	41	8	50	11	46	57

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
37	C(10%) D	Residential	75	1	5	6	5	2	7
		Commercial	-199	-3	-2	-5	-9	-9	-17
		Office	-13	-2	0	-2	0	-2	-2
		Industrial	836	97	13	110	14	102	116
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	699	93	16	109	10	93	104
		Internal Cap.	-31	-2	-1	-3	-1	-3	-4
		Pass-by				3	3	6	
		Total	668	91	15	106	12	93	106

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
38	E(33%)	Residential	68	1	4	5	4	2	6
		Commercial	-39	-1	0	-1	-2	-2	-3
		Office	0	0	0	0	0	0	0
		Industrial	990	115	16	131	17	121	138
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	1019	115	20	135	19	121	141
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					1	1	1
		Total	1019	115	20	135	20	122	142

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
39	F(15%)	Residential	42	1	3	3	3	1	4
		Commercial	262	4	2	6	11	12	23
		Office	0	0	0	0	0	0	0
		Industrial	628	73	10	83	11	77	87
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	932	78	15	92	25	90	114
		Internal Cap.	-112	-9	-2	-11	-3	-11	-14
		Pass-by					-4	-4	-8
		Total	820	69	13	81	18	75	92

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
40	C(67%)	Residential	68	1	4	5	4	2	7
		Commercial	586	8	5	13	25	26	51
		Office	-10	-1	0	-1	0	-1	-1
		Industrial	1106	129	17	146	19	135	154
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	1750	137	26	163	48	162	211
		Internal Cap.	-210	-16	-3	-19	-6	-19	-25
		Pass-by					-9	-9	-17
		Total	1540	121	23	144	33	134	169

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
41	D(67%)	Residential	131	2	8	10	8	4	12
		Commercial	-582	-8	-5	-13	-25	-25	-50
		Office	-23	-3	-1	-3	-1	-3	-3
		Industrial	1362	158	21	180	23	167	190
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	888	149	23	174	5	143	149
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					9	9	17
		Total	888	149	23	174	14	152	166

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
42	E(67%)	Residential	138	2	9	11	8	5	13
		Commercial	-78	-1	-1	-2	-3	-3	-7
		Office	0	0	0	0	0	0	0
		Industrial	2011	234	32	265	34	246	280
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2071	235	40	274	39	248	286
		Internal Cap.	0	0	0	0	0	0	0
		Pass-by					1	1	2
		Total	2071	235	40	274	40	249	288

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
43	F(45%)	Residential	126	2	8	9	8	4	12
		Commercial	785	11	7	18	33	35	68
		Office	0	0	0	0	0	0	0
		Industrial	1883	219	30	248	32	230	262
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2794	232	45	275	73	269	342
		Internal Cap.	-335	-28	-5	-33	-9	-32	-41
		Pass-by					-11	-12	-23
		Total	2459	204	40	242	53	225	278

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
44	B	Residential	141	2	9	11	9	5	13
		Commercial	1252	18	11	29	53	55	109
		Office	-1	0	0	0	0	0	0
		Industrial	1847	215	29	244	31	226	257
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	3239	235	49	284	93	286	379
		Internal Cap.	-389	-28	-6	-34	-11	-34	-45
		Pass-by					-18	-19	-37
		Total	2850	207	43	250	64	233	297

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
45	H	Residential	139	2	9	11	8	5	13
		Commercial	1246	18	11	29	53	55	108
		Office	0	0	0	0	0	0	0
		Industrial	813	94	13	107	14	100	113
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2198	114	33	147	75	160	234
		Internal Cap.	-264	-14	-4	-18	-9	-19	-28
		Pass-by					-18	-19	-37
		Total	1934	100	29	129	48	122	169

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
46	F(40%)	Residential	112	2	7	8	7	4	10
		Commercial	698	10	6	16	30	31	61
		Office	0	0	0	0	0	0	0
		Industrial	1674	194	26	221	28	205	233
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2484	206	39	245	65	240	304
		Internal Cap.	-298	-25	-5	-30	-8	-29	-36
		Pass-by					-10	-11	-21
		Total	2186	181	34	215	47	200	247

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
47	A	Residential	182	3	11	14	11	6	17
		Commercial	186	3	2	4	8	8	16
		Office	-67	-8	-1	-9	-2	-8	-9
		Industrial	2686	312	43	355	45	329	374
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2987	310	55	364	62	335	398
		Internal Cap.	-358	-37	-7	-44	-7	-40	-48
		Pass-by					-3	-3	-5
		Total	2629	273	48	320	52	292	345

SOUTHEAST INDUSTRIAL		Land Use	Daily	AM PEAK HOUR			PM PEAK HOUR		
TAZ	Sub-Areas			In	Out	Total	In	Out	Total
48	G	Residential	92	1	6	7	6	3	9
		Commercial	810	12	7	19	34	36	70
		Office	-3	0	0	0	0	0	0
		Industrial	1531	178	24	202	26	188	213
		Church	0	0	0	0	0	0	0
		Education	0	0	0	0	0	0	0
		Govt Facilities	0	0	0	0	0	0	0
		Sub-Total	2430	191	37	228	66	227	292
		Internal Cap.	-292	-23	-4	-27	-8	-27	-35
		Pass-by					-12	-12	-24
		Total	2138	168	33	201	46	188	233

Fullerton Land Use - Trip Rates

Fullerton GPU Land Use	Land Use Code	Land Use Description	Units	Trip Rates ¹						
				Daily	AM In	AM Out	AM Total	PM In	PM Out	PM Total
Single Family Residential	210	Single-Family Detached Housing	Dwelling Units	9.57	0.1875	0.5625	0.75	0.6363	0.3737	1.01
Multifamily Residential	220	Apartment	Dwelling Units	6.65	0.1020	0.4080	0.51	0.4030	0.2170	0.62
Commercial-Retail	820	Shopping Center	1,000 SF	42.94	0.6100	0.3900	1.00	1.8277	1.9023	3.73
Office	710	General Office Building	1,000 SF	11.01	1.3640	0.1860	1.55	0.2533	1.2367	1.49
Light Industrial	110	General Light Industrial	1,000 SF	6.97	0.8096	0.1104	0.92	0.1164	0.8536	0.97
College/University	550	University/College	students	2.38	0.1680	0.0420	0.21	0.0630	0.1470	0.21

¹ Source: ITE Trip Generation 8th Edition



City of La Habra

"A Caring Community"

COMMENT LETTER C

ADMINISTRATIVE BUILDING

201 E. La Habra Boulevard
Post Office Box 337
La Habra, CA 90633-0785
Office: (562) 905-9701
Fax: (562) 905-9781

April 3, 2012

Ms. Heather Allen, AICP
Planning Manager
City of Fullerton
303 West Commonwealth Avenue
Fullerton, California 92832

Re: Notice of Availability/Notice of Completion
Draft Environmental Impact Report-Fullerton Plan

Dear Ms. Allen,

Thank you for the opportunity to review the Notice of Availability/Notice of Completion for the Draft Environmental Impact Report prepared for the project known as the "Fullerton Plan". As you are aware, CEQA allows potentially affected agencies to comment on proposed projects that may cause environmental impacts to their community. Given the nature of the project, the following are our concerns and comments:

1. The DEIR indicated significant unavoidable traffic impacts under Buildout 2030, cumulative conditions and deficient operations at Lambert Road and Harbor Boulevard and at Imperial Highway and Harbor Boulevard resulting from the project. The DEIR indicated proposed mitigation TR-1 which states in part "the City and/or proponent shall prepare a detailed multi-modal analysis in order to determine specific impacts associated with the proposed General Plan Amendment and/or Zone Change, and where applicable, identify mitigation measures to reduce impacts to less than significant levels based on City adopted multi-modal thresholds". Consequently, we would appreciate the opportunity to review these analyses when they become available. There may be further comments at that time.
2. The City of La Habra requires development to pay "fair share" traffic impact fees towards intersections that require improvements, in order to maintain acceptable Levels of Service ("LOS") for existing and future conditions. The EIR should address the need for projects that impact the City of La Habra's circulation system to contribute "fair share" traffic impact fees for impacts at critical intersections in La Habra.

C1

C2

**COMMUNITY
DEVELOPMENT**

APR 04 2012

DEPARTMENT

Ms. Allen
Page 2
4/3/12

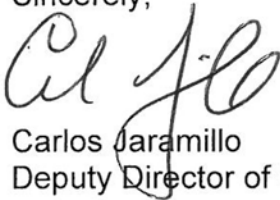
3. Imperial Highway and Harbor Boulevard (south of Imperial Highway) in the City of La Habra are on the Orange County Congestion Management Program (CMP) Highway System. Furthermore, the intersections of Imperial Highway/Beach Boulevard and Imperial Highway/Harbor Boulevard are monitored intersections on the Orange County CMP system. Any CMP impacts need to be addressed by the Project EIR. The DEIR did not indicate significant impacts at Imperial Highway and Beach Boulevard. Was this intersection considered in the analysis?

C3

We are prepared to assist you in addressing the above concerns. We would request that revisions made to the draft environmental impact report be forwarded to the City of La Habra for review and comment. Additional comments may be generated based on that review.

If you should have any questions, please feel free to contact me at (562) 905-9724.

Sincerely,



Carlos Jaramillo
Deputy Director of Community Development

cc: Don Hannah, City Manager
Jennifer Cervantez, Assistant City Manager
Michael Haack, Director of Community Development



C. RESPONSES TO COMMENTS FROM CARLOS JARAMILLO, CITY OF LA HABRA, DATED APRIL 3, 2012

- C1. The comment is acknowledged. The City would continue to provide neighboring jurisdictions the opportunity to review and provide comments on environmental documents and associated technical studies prepared for projects within the City of Fullerton, as applicable.
- C2. The City of Fullerton does not currently have an agreement with the City of La Habra, or any other City, that establishes and identifies implementation of a fair share program for development projects to pay traffic impact fees to adjacent cities. The Fullerton Plan includes Policy P5.1 to support regional and subregional efforts to implement programs that coordinate the multi-modal transportation needs and requirements across jurisdictions, including but not limited to the Master Plan of Arterial Highways, the Commuter Bikeways Strategic Plan, the Signal Synchronization Master Plan, the Orange County Congestion Management Plan, and the Growth Management Plan. Additionally, Draft EIR Mitigation Measure TR-1 would be revised in the Final EIR, as follows:

TR-1 Prior to approval of any General Plan Amendment and/or Zone Change associated with the focused planning efforts for The Fullerton Plan Focus Areas, the City and/or project proponent shall prepare a detailed multi-modal analysis in order to determine specific impacts associated with the proposed General Plan Amendment and/or Zone Change, and where applicable, identify mitigation measures to reduce impacts to less than significant levels based on City adopted multi-modal thresholds. The multi-modal analysis shall specify the timing, funding, construction, and fair share responsibilities for all traffic improvements necessary to maintain satisfactory levels of service within the City of Fullerton and surrounding jurisdictions, in accordance with the significant impact criteria established by the jurisdiction that controls the affected area.

The following Mitigation Measure will be included in the Final EIR, as follows:

TR-2 In conjunction with the preparation of any multi-modal analysis as required in Mitigation Measure TR-1, the City of Fullerton shall coordinate with adjacent jurisdictions, as applicable, to assess potential project impacts for any development forecasted to generate more than 100 peak hour trips in The Fullerton Plan Focus Areas. Improvements to mitigate significant impacts and the associated fair share costs shall be developed in coordination with the jurisdiction that controls the affected areas.



- C3. The Beach Boulevard and Imperial Highway intersection was considered in the Draft EIR traffic analysis (Section 5.4, *Traffic and Circulation*), as requested by the City of La Habra. As indicated in Draft EIR Table 5.4-9, the Beach Boulevard/Imperial Highway intersection is forecast to operate at an acceptable Level of Service (LOS) under buildout of The Fullerton Plan.

NCL 12-005

April 3, 2012

Ms. Heather Allen, AICP, Planning Manager
City of Fullerton
303 West Commonwealth Avenue
Fullerton, California 92832

SUBJECT: Notice of Availability/Notice of Completion of a Draft Environmental Impact Report for the City of Fullerton General Plan Update

Dear Ms. Allen:

The County of Orange has reviewed the Notice of Availability/Notice of Completion of a Draft Environmental Impact Report for the City of Fullerton General Plan and offers the following comment:

Flood Programs:

Thank you for the opportunity to review the Notice of Availability/Notice of Completion of DEIR for the City of Fullerton General Plan Update. We offer the following comment:

1. In Chapter 20 on page 3-72, the Action A26.1 states that the City will "encourage the Orange County Flood Control District to make improvements to regional drainage channels to alleviate the potential for flooding within the City of Fullerton," which may or may not be caused by the regional facilities.

We would like to mention that the improvements to OCFCD regional facilities are based on the 7-year Plan which is developed through impact and participation by cities. Every year cities have an opportunity to identify projects to address pressing local objectives. Given the importance of each of these projects and budgetary constraints that do not allow to execute all of these projects at the same time, the City Engineers Flood Control Advisory Committee (CEFCAC) proposed project ranking system is implemented into the 7-year plan.

If you have any questions regarding this comment, please contact Anna Brzezicki at 647-3989.

Environmental Resources:

In response to your request for input on the subject project, Environmental Resources has reviewed the document and offers the following comments:

D1

D2

**COMMUNITY
DEVELOPMENT**
APR 05 2012
DEPARTMENT

Ms. Heather Allen, AICP
City of Fullerton
April 3, 2012

With regard to the General Plan's Goal 20 for regional and sub-regional efforts to support cleaner and reduced urban runoff, decision-makers on the EIR should be apprised that a Model Watershed Hydromodification and Infiltration Management Plan (WIHMP) for the San Gabriel River/Coyote Creek Watershed was submitted to the Santa Ana Regional Water Quality Control Board on May 23, 2011, to conform with municipal stormwater permit requirements for watershed master plans.

D2

If you require additional information please contact Grant Sharp at (714) 955-0674.

Sincerely,



Michael Balsamo
Manager, OC Community Development
OC Public Works/OC Planning
300 North Flower Street
Santa Ana, California 92702-4048
Michael.Balsamo@ocpw.ocgov.com

cc: Mehdi Sobhani, Flood Programs
Chris Crompton, Environmental Resources



D. RESPONSES TO COMMENTS FROM MICHAEL BALSAMO, MANAGER, OC COMMUNITY DEVELOPMENT, DATED APRIL 3, 2012

D1. The comment does not raise new environmental information or directly challenge information provided in the Draft EIR. The comment is acknowledged. No further response is necessary.

D2. The comment does not raise new environmental information or directly challenge information provided in the Draft EIR. The comment is acknowledged. No further response is necessary.



FULLERTON JOINT UNION HIGH SCHOOL DISTRICT

Business Services

1051 W. Bastanchury Rd., Fullerton CA 92833

Ph (714) 870-2819

FAX (714) 870-2835

April 4, 2012

Ms. Heather Allen, AICP
 Planning Manager
 City of Fullerton
 303 West Commonwealth Avenue
 Fullerton, CA 92832

Via Email: HeatherA@ci.fullerton.ca.us

Subject: Fullerton Plan (General Plan Update) – Draft EIR

Dear Ms. Allen,

Thank you for providing the Fullerton Joint Union High School District the opportunity to comment on the Fullerton Plan (General Plan Update) – Draft Environmental Impact Report. It is the understanding of the District from the information contained in Section 5.14 – School Facilities, that this update to the City’s General Plan identifies the potential for the addition of 9,410 multi-family units and 909 single-family units (total 10,183 residential units) throughout the course of build out of the Fullerton Plan, which is anticipated to occur over the next 20 years.

The District’s comments in response to the Fullerton Plan (General Plan Update) – Draft Environmental Impact Report are provided below.

Development Mitigation

It is the position of the District that development within the District should mitigate 100% of the cost of facilities needed to housing the students that are generated by that development. In the event that School Facility Program funds are available from the State, those monies can be used to offset a portion of the cost of constructing the school facilities. **Statutory developer fees and state School Facility Program grant amounts do not fully mitigate the cost of constructing school facilities.** Additional funding is needed to offset the costs associated with temporary housing and permanent construction of additional facilities to house and support the projected students.

E1

A variety of options beyond statutory developer fees are available for mitigating the impact of development and include, but are not limited to:

1. Developer/District negotiated mitigation agreements
2. Mello-Roos Community Facilities Districts
3. Developer-Built Schools

E1

The District encourages the developers to work proactively with the District to achieve appropriate mitigation solutions for the students generated by their respective developments and the collective and cumulative impacts that are created by multiple developments within the District's boundary.

Summary of Facility Needs

Based on the information contained in Section 5.14 – School Facilities of the Fullerton Plan, the District will require additional facilities to house the anticipated 1,713 additional high school students that development will generate. While not all of these high school students will attend Fullerton Joint Union High School District schools (a portion will attend the Placentia-Yorba Linda Unified School District), the District will still need to provide facilities to house its share of these anticipated students.

Attendance at the District's six comprehensive high schools ranges from approximately 1,960 to 2,300. Assuming 85% of the 1,713 projected students materialize as Fullerton Joint Union High School District students, the District will need to provide facilities commensurate with 63% to 74% of a complete high school. While this may not require that a new high school is constructed on a separate site, additional analysis will need to be conducted in order to determine the exact number of students that will be generated by this project and where within the District they will reside.

E2

Using the District's staffing ratio of 28.5:1 (28.5 students per teacher/classroom), approximately 48 additional regular classrooms will need to be constructed ($1,713 \times 85\% = 1,456 \div 28.5 = 51$) to house the anticipated students. In addition to regular classrooms, facilities to support core academic programs such as science, technology, and engineering as well as electives, sports and co-curricular programs, special education, administration, maintenance, transportation, food services, and other and ancillary facilities will also need to be constructed.

In order to accommodate the anticipated growth, additional land may need to be acquired and attendance boundaries adjusted. Secondary impacts such as traffic, adequate staff and student parking, safe routes to schools, transportation (busing), traffic, and student drop off/pick up areas, etc. will need to be considered, all of which will trigger CEQA analysis and environmental review.

Payment of Statutory Fees Does Not Fully Mitigate the Impacts of Development

E3

As stated above, the District expects development projects to mitigate 100% of the cost to acquire land and construct the facilities necessary to accommodate and house the students generated from the development. Implementation of the Fullerton Plan will have significant impacts to the District requiring mitigation through the funding and construction of a variety of facilities that cannot be accomplished through project-by-project basis fee payment approach. A long-term facilities master plan, identifying needs by development area and outlining options/solutions, will need to be developed by the District in response to the implementation of the Fullerton Plan.

E3

Impacts created by the implementation of the Fullerton Plan are not less than significant, and are not fully mitigated by the payment of statutory fees.

Comments by Specific Sections

Section 5.14.3 Fullerton Joint Union High School District

With a District-wide capacity of 14,307 students, and current enrollment hovering in the same range, implementation of the Fullerton Plan will require the creation of temporary student housing and construction of additional facilities, as well as the possible acquisition of additional land on which to construct the facilities. Sufficient capacity does not currently exist at District schools to house the project increase of approximately 1,456 students that would attend District schools.

E4

Section 5.14.5 School Facilities

Paragraph 2 on page 5.14-6 indicates that because build out is anticipated to occur over 20 years; payment of statutory fees in effect at the time of development are needed to “compensate for the impacts of development on school capacities.” While payment of school fees are necessary, a project-by-project payment approach will not provide for the long-term planning that will be required to adequately house an estimated 1,456 students. There are cumulative impacts to schools from long-term sustained development that cannot easily be addressed on a project-by-project basis. Careful monitoring of growth and coordination between projects will be required in order to meet student housing demands.

E5

The last sentence in the same paragraph acknowledges that additional measures beyond statutory fees would be determined on a project-by-project basis. The District appreciates this acknowledgement in the report and would reiterate the statements made earlier in this communication that statutory developer fees and state School Facility Program grant amounts do not fully mitigate the cost of constructing school facilities. Additional funding is needed to offset the costs associated with constructing additional facilities to house the projected students.

E6

Section 5.14.5 Policies and Actions

E7

The District appreciates the acknowledgement, attention, and importance the City has given to the educational system and schools' role as "community centers" in the City. The positive relationship that exists between city, schools, and community is quintessential to vibrant and healthy neighborhoods. Thank you for fostering this with the policy and action statements as outlined on pages 5.15-6 and 5.14-7.

E7

Section 5.14.6 Cumulative Impacts

The District disagrees with the statement in the last sentence of the first paragraph on page 5.14-8, which states: "Therefore, development of the proposed project and related cumulative projects would not result in significant cumulative impacts in regards to school services and facilities," for the reasons outlined below.

While payment of fees pursuant to SB 50 is considered full mitigation for project impacts, it should be noted that the regulations promulgated as a result of SB 50 have now been in place for almost 14 years. Subsequent and numerous revisions have altered, to a rather significant level, these regulations. Additionally, the cyclical nature of the economy since their inception has destabilized, not only the buying power of the public dollar, but also the construction market. Funding for construction projects financed under these regulations has not kept pace with construction cost increases, nor do the regulations take into account regional differences. Construction costs on the San Francisco peninsula and in the San Joaquin Valley are not comparable to Orange County.

E8

It is important to note that SB 50 and the State School Facilities program that was created as a result, is intended to only fund 50% of the cost of school facilities. Districts are responsible for raising the other 50%. Data collected since SB 50 went into effect has shown that the actual state contribution from this program is more along the lines of 35% to 40%, leaving school districts to fund the balance. Due to State bonding capacities versus the statewide need, the State Facility Program is often underfunded as well. In short, the program as it exists now, does not provide 100% of the funds necessary to adequately construct school facilities to offset the impact of development. Statutory developer fees and State School Facility Program grant amounts are simply not sufficient to fully mitigate the cost to construct adequate and appropriate school facilities.

Conclusion

Thank you for the opportunity to comment on the Fullerton Plan (General Plan Update) – Draft EIR. The District appreciates the opportunity to comment as well as the quality working relationship that exists between the District and the City. The District would welcome additional dialog with the City regarding the Fullerton Plan. This conversation might also involve other school districts impacted by the General Plan update.

If you have any questions, please feel free to call me at (714) 870-2810.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ronald N. Lebs", with a long horizontal flourish extending to the left.

Ronald N. Lebs
Assistant Superintendent
Business Services

CC George Giokaris, Superintendent
Fullerton Joint Union High School District

Susan Cross Hume, Assistant Superintendent, Business Services
Fullerton School District

Doug Domene, Assistant Superintendent, Business Services
Placentia-Yorba Linda Unified School District



E. RESPONSES TO COMMENTS FROM RONALD N. LEBS, ASSISTANT SUPERINTENDENT BUSINESS SERVICES, FULLERTON JOINT UNION HIGH SCHOOL DISTRICT, DATED APRIL 4, 2012

- E1. The comment states that statutory developer fees and state School Facility Program grant amounts do not fully mitigate the cost of construction school facilities and that additional funding is needed to offset the costs associated with additional facilities.¹ As acknowledged in the Draft EIR, in order to accommodate students from new development projects, school districts may alternatively finance new schools through special school construction funding resolutions and/or agreements between developers, the affected school districts, and occasionally, other local governmental agencies.
- E2. Because this project entails an update to the General Plan and proposes no specific development project, the Draft EIR appropriately took a citywide approach as opposed to site-specific project level approach to environmental analysis. The number of residential units, students generated, and where within the District they will reside is unknown until individual development projects are proposed. It is acknowledged that additional CEQA analysis may be required if construction of additional school facilities is determined to be necessary.²
- E3. Refer to Response to Comment E1. The comment notes that a long-term facilities master plan, identifying needs by development area and outlining options/solutions will need to be developed by the District in response to the implementation of The Fullerton Plan and that impacts are not less than significant and are not fully mitigated by the payment of statutory fees.³ As stated in the Draft EIR, buildout of The Fullerton Plan is anticipated to occur over 20 years, based on market demand; thus, any increase in demand for school services would occur gradually as additional development is added to the area. In order to maintain adequate classroom seating and facilities standards, individual development projects would be required to pay statutory fees, in effect at the time, to the school districts serving the project area in order to compensate for the impacts of development on school capacities. Because this project entails an update to the General Plan and proposes no specific development project, the number of residential units, students generated, and where within the District they will reside is unknown until individual development projects are proposed. Additional mitigation measures beyond statutory fees would be determined on a project-by-project basis.

¹ In 1998, the California Legislature passed legislation setting caps on the amount of school fees that cities and counties are permitted to impose on both residential and non-residential development projects. The statutes state that these fees are the exclusive means of considering as well as mitigating school impacts caused by new development. Accordingly, these fees limit the scope of impact review in an Environmental Impact Report, the mitigation that can be imposed, and the findings a lead agency must make in justifying its approval of a project. Government Code Sections 65995-65996. See also, *Chawanakee Unified School District v. County of Madera* (2011) 196 Cal.App.4th 1016. Under *Chawanakee*, the impacts of new school construction (including reasonably foreseeable new school construction necessitated by new residential development) on the non-school environment and such impacts as traffic impacts of increased student busing to and from a school facility do have to be examined, if applicable to a particular project, but the project's impacts in causing school overcrowding or inadequate classroom facilities do not.

² Ibid.

³ Ibid.



Additionally, The Fullerton Plan includes Policies P17.15 and P17.16, which would continue to mitigate the impacts of growth by assessing school impact fees and other appropriate mitigation measures and would support programs to assess and mitigate project impacts pertaining to on- and off-campus development. The City would continue to coordinate with the local school districts to address growth within the community and school needs associated with the growth. Thus, with impacts associated with The Fullerton Plan would be reduced to a less than significant level.

- E4. The comment is acknowledged. No further response is necessary.
- E5. Refer to Response to Comment E3.
- E6. Refer to Responses to Comments E1 and E3.
- E7. The comment is acknowledged. No further response is necessary.
- E8. Refer to Responses to Comments E1 and E3.



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: April 5, 2012
HeatherA@ci.fullerton.ca.us

April 5, 2012

Ms. Heather Allen
City of Fullerton
303 West Commonwealth Avenue
Fullerton, CA 92832

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Fullerton Plan Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the AQMD staff recognizes the potential regional air quality benefits from the proposed project that facilitates mixed land uses and encourages transit oriented development in the identified focus areas. However, given the potential health risk impacts from placing sensitive land uses (e.g., residential, hospital, school and park uses) within close proximity to significant emissions sources, such as the 91 Freeway, 5 Freeway, 57 Freeway, and industrial facilities the AQMD staff encourages the lead agency to focus development of these sensitive land uses as far as possible from these emissions sources. As the majority of the transit oriented development areas for this project lay outside the California Air Resources Board (CARB) recommended buffer zones¹, it appears that the goal of increasing development near transit hubs should still be achievable.

F1

Further, AQMD staff requests that the lead agency further clarify how the policies for the proposed plan effectively reduce the project's growth inducing impacts to be consistent with regional and statewide planning efforts including the 2007 Air Quality Management Plan (AQMP), the Regional Transportation Plan (RTP) and the California Air Resources Board Climate Change Scoping Plan². Also, the lead agency should consider additional mitigation measures to minimize the project's significant regional construction-related air

F2

¹ California Air Resources Board recommended buffer zones can be found in the "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

² The California Air Resources Board AB 32 Climate Change Scoping Plan document. Accessed at: <http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>

quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

F2

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

F3

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

ORC120221-02
Control Number

Siting Criteria and Performance Standards for Sensitive Land Uses

1. The AQMD staff recognizes that the proposed project may provide regional air quality benefits compared to “traditional” development by fostering transit oriented development through a mix of land uses that could reduce the overall vehicle miles traveled (VMT) in the region. However, the AQMD staff is concerned that the proposed project could pose significant health risk impacts to future residents from emissions sources that have not been quantified and disclosed in the Draft EIR. Specifically, the lead agency is proposing mixed land uses that consist of commercial, residential, and educational uses that are either adjacent or in close proximity to industrial land uses, the 91 Freeway, the 5 Freeway, and the 57 Freeway which are prominent sources of toxic air contaminants (TACs). For example, in Exhibit 3-4 of the Draft EIR the lead agency indicates that focus areas could allow new residential units to be placed between Orangethorpe Avenue and the 91 Freeway that carries over 270,000 vehicles per day. As a result, the lead agency determined that the proposed project would impose significant air quality impacts; therefore, the AQMD staff recommends that the lead agency enhance mitigation measure AQ-13 to include performance standards that exhaust all options to minimize TAC exposure to sensitive land uses besides the buffers recommended in the CARB Handbook³. Potential additional measures to consider are included in the Environmental Justice Appendix (see pages 149 and 150 of the appendix) of the recently adopted RTP

F4

Greenhouse Gas Emissions Analysis

2. Based on a review of the Draft EIR the lead agency has determined that the proposed project will achieve its greenhouse gas (GHG) reduction target of 15% below 2009 levels by 2020. However, the AQMD staff requests further clarification about how the project is consistent with statewide AB 32 goals. Specifically, the baseline year used for the proposed project is 2009 GHG emissions levels whereas the baseline year used in the CARB Scoping Plan is 2005. The AB 32 Scoping Plan proposed a 15% reduction below 2005 emissions to achieve 1990 levels by 2020. If the project area 2009 levels are greater than 2005 levels then the project’s proposed 15% reduction may not be sufficient to achieve 1990 levels by 2020. Therefore, the AQMD staff requests that the lead agency clarify that a 15% GHG emissions reduction from 2009 levels is consistent with statewide initiatives.

F5

Further, the project’s GHG emissions impacts are primarily from mobile source emissions (i.e., approximately 66%) related to the substantial increase of vehicle mile traveled (VMT) associated with the proposed project. As a result, the lead agency addresses this large increase in mobile source emissions with aggressive measures such as Measure T-1 of the Climate Action Plan that requires a reduction in single occupant vehicle trips and garners a substantial GHG emission reduction (29% of the total reduction). However, the lead agency does not provide calculations that include baseline VMT assumptions, VMT forecasts, and population penetration data that demonstrates the presumed effectiveness of these measures. Therefore, the AQMD

F6

³ California Air Resources Board. April 2005. “Air Quality and Land Use Handbook: A Community Health Perspective.” Accessed at:<http://www.arb.ca.gov/ch/landuse.htm>