

staff recommends that the lead agency provide additional data and detailed calculations that disclose how the proposed project will achieve the GHG emission reduction target. The lead agency is encouraged to consult with AQMD staff to discuss our experience implementing Rule 2202

F6

Regional Plan Consistency

3. The lead agency determined that the proposed project will result in housing and population growth that exceeds the assumptions of the 2008 RTP forecast (based on Table 5.2-11 of the Draft EIR). Further, the lead agency states that plan accounts for this population growth by establishing goals and policies that reduce all potential growth-related air quality impacts. However, the lead agency does not provide any quantitative analyses or measures to demonstrate that the project's goals and policies will sufficiently mitigate the project's growth inducing impacts consistent with the 2008 RTP and subsequently consistency with the 2007 AQMP. The final CEQA document should therefore provide a quantified analysis demonstrating consistency with the 2007 AQMP. As the 2012 RTP was recently adopted by SCAG, the final CEQA document should also describe if or how this project has been incorporated into this update, and if not, if it would still be consistent.

F7

Construction Equipment Mitigation Measures

4. The lead agency determined that the proposed project will exceed the CEQA regional construction significance thresholds; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements,
- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles) have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices

F8

certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

F8

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html



F. RESPONSES TO COMMENTS FROM IAN MACMILLAN, PROGRAM SUPERVISOR, SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, DATED APRIL 5, 2012

- F1. The comment requests that development within the General Plan is focused as far as possible from significant emissions sources (e.g., State Route [SR] 91, SR-57, Interstate 5, and industrial facilities). The Fullerton Plan includes twelve Focus Areas that present opportunities where land use and design change can help fully implement the Fullerton Vision. The Focus Areas were selected based on various criteria in order to achieve enhancement or reinvestment and take advantage of special community resources. It should be noted that not all of the Focus Areas are located near significant emissions sources. Additionally, several Focus Areas cover large areas and while a portion may be located near a significant emissions source, the majority of a Focus Area includes areas that are outside of the buffer zones recommended by the California Air Resources Board (CARB). The Draft EIR also provides Mitigation Measures AQ-13 and AQ-14, which includes the criteria identified in the CARB *Air Quality and Land Use Handbook* for determining safe locations for sensitive receptors. These mitigation measures are consistent with the CARB guidelines and future development projects would be required to be consistent with the recommended guidance. If future development projects are found to be inconsistent, mitigation would be required to reduce impacts to a less than significant level.
- F2. Draft EIR Section 5.5, *Air Quality*, analyzes the project's consistency with regional plans including the *2007 Air Quality Management Plan for the South Coast Air Basin (AQMP)* and various Southern California Association of Governments (SCAG) air quality policies. Although the program-level analysis of emissions associated with the future development in the City associated with implementation of The Fullerton Plan is anticipated to exceed SCAQMD thresholds, it should be noted that the SCAQMD thresholds are intended to evaluate the air quality impacts from individual development projects, and do not apply to plan-level projects such as The Fullerton Plan. The Fullerton Plan includes goals and policies within the Natural Environment and Built Environment Elements that would reduce air quality impacts associated with future developments within the City. Development projects occurring under The Fullerton Plan would be required to comply with The Fullerton Plan goals and policies and SCAQMD regulations, and would incorporate mitigation measures, as feasible, to reduce air quality impacts.

The Fullerton Plan does not propose any land use changes, with the exception of minor changes to existing parcels, which are necessary to resolve inconsistencies between the current General Plan land use designation and current zoning district. Although the City's projected population, housing, and employment growth would be greater than what was projected by SCAG, project implementation would not conflict with SCAG's forecasts. The Fullerton Plan accounts for the population growth and establishes Goals and Policies to reduce potential growth-related impacts. As a result, the proposed project would not change the land uses that the 2007 AQMP was based upon, and The Fullerton Plan would be consistent with the 2007 AQMP assumptions.



Growth inducing impacts were also analyzed in Draft EIR Section 6.3, and the analysis compared The Fullerton Plan Growth projections with SCAG's regional and City projections. As described in the analysis, The Fullerton Plan would increase the City's existing housing inventory and employment and would improve the City's jobs/housing ratio to provide adequate employment opportunities for its residents. The analysis within the Draft EIR determined impacts in this regard to be less than significant.

The Fullerton Plan includes relevant goals and policies that reflect and respond to SCAG's regional goals. As indicated in Draft EIR Table 5.1-5 of Section 5.1, Land Use and Planning, The Fullerton Plan would be consistent with SCAG's regional planning efforts of the RTP. The Fullerton Plan includes several goals and policies pertaining to regional mobility, reduced vehicle trips, energy efficiency, smart growth and land use patterns, which are consistent with SCAG's RTP goals and Compass Growth Visioning Regional Growth Principles. The comment also notes the recent adoption of the 2012 RTP; however, the analysis focuses on the 2008 RTP, which was the latest adopted document at the time the Notice of Preparation was issued and during the preparation of the Draft EIR.⁴ The 2012 RTP was adopted at the end of the public comment and review period of the Draft EIR. Additionally, the Housing Element identifies goals, policies, and programs to provide housing consistent with the Regional Housing Needs Assessment (RHNA), which includes a variety of housing types to meet the housing needs of all income levels.

- F3. The comment requests that written responses are provided to all comments prior to the adoption of the Final EIR. The City of Fullerton is fully complying with the requirements of the California Environmental Quality Act (CEQA) Section 21092.5, and will be preparing written responses to environmental comments provided to the City during the 45-day public review period. In compliance with CEQA, all public agencies will be provided written responses to their comments 10-days prior to certification of the Final EIR. In addition, the City Council will have the "Comments and Responses" section of the Final EIR for their review and consideration prior to taking any action on the Final EIR.
- F4. This comment reiterates the comments regarding health risk above. Refer to Response F1.
- F5. In the CARB Scoping Plan, "today's levels" are based on the statewide GHG inventory for 2005. However, cities and counties are encouraged to set a 15 percent GHG reduction target for both municipal operations and the community as a whole based on the most current GHG inventory conducted. Year 2009 emissions inventories were developed based on data collected during The Fullerton Plan and the Draft EIR development process. Year 2009 was utilized as the baseline for the GHG emissions analysis in order to be consistent with the baseline data for the rest of the Draft EIR, including traffic/vehicle miles traveled data and the baseline land use inventory.

⁴ Per SCAG's comment letter on The Fullerton Plan Draft EIR, dated April 5, 2012, the Draft EIR "should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts."



- F6. Transportation data utilized for the GHG emissions inventories, including vehicle miles traveled (VMT), are based on traffic data provided by Kimley Horn and Associates, Inc. As stated in Draft EIR Section 5.21, *Greenhouse Gas Emissions*, Kimley Horn and Associates, Inc. worked with the Orange County Transportation Authority (OCTA) to determine the vehicle activity data (i.e., VMT) occurring on local roadways and freeway ramps within the City limits. In order to determine VMT within the City, OCTA performed a select link analysis for all trips that originated and ended in the City of Fullerton for all time periods. Daily traffic volumes were then calculated by summing traffic volumes for each time period. The VMT data was calculated by multiplying the traffic volumes for each link by the length of each link. Additionally, City staff provided vehicle and VMT data for the Municipal (i.e., City) vehicle fleet.

VMT data collected for the GHG emissions inventory was based on business as usual (BAU) assumptions and land use data. As noted in the comment, a majority of the City's GHG emissions are related to vehicle emissions under a BAU scenario. Therefore, the City can achieve the greatest GHG emissions reductions through transportation and land use measures and policies. For example, the Transportation and Mobility Strategy is intended to promote a balanced transportation system that facilitates the use of public transportation and bicycles, reduces congestion, and helps encourage residents to engage in healthy and active lifestyles. This strategy includes measures to reduce trips and increase alternative modes of transportation. Development within the Focus Areas is intended to facilitate this process. Calculations of the GHG emissions reductions for the various reduction measures are based on guidance and research documents such as the Center for Clean Air Policy, *Transportation Emissions Guidebook*, 2007; California Air Pollution Officers Control Association, *Quantifying Greenhouse Gas Mitigation Measures*, August 2010; and the Victoria Transport Policy Institute, *Online TDM Encyclopedia, Land Use Impact on Transport* (<http://www.vtpi.org/tdm/tdm20.htm>). The analysis also took into account the various regional assumptions, data, and anticipated programs outlined in the *Orange County Sustainability Communities Strategy* (prepared for OCTA and the Orange County Council of Governments), June 14, 2011. Draft EIR Section 5.5, *Air Quality*, also includes Mitigation Measure AQ-10, which requires future developments to comply with SCAQMD Rule 2202 (employee commute reduction programs), to further reduce vehicle emissions.

- F7. This comment reiterates the comments regarding regional plan consistency above. Refer to Response F2.
- F8. The comment requests additional construction mitigation to be added into the Final EIR. The air quality analysis is included in Draft EIR Section 5.5, *Air Quality*, which is a programmatic document that analyzes proposed land use changes and anticipated growth within the City. As such, the construction analysis does not review a specific development project. Future development projects would require individual CEQA review where specific impacts would be determined and necessary mitigation would be identified.

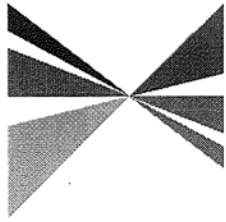
The construction mitigation measures that are provided in this comment include compliance with SCAQMD rules and regulations (e.g., Rule 1113, Rule 403, and Rule 2202) and other relevant guidance. The Draft EIR includes The Fullerton Plan Policy P21.6, which requires the reduction of impacts related to air quality from private and



public construction projects. This policy supports compliance with current SCAQMD rules, regulations, and thresholds, and implementation of all SCAQMD best management practices.

The Draft EIR includes eight construction mitigation measures that require Best Available Control Measures for projects that exceed SCAQMD thresholds. Mitigation Measures AQ-1 through AQ-3 require compliance with SCAQMD Rules and the State Vehicle Code to reduce fugitive dust and VOC emissions. Mitigation Measures AQ-4 through AQ-6 include various requirements to reduce off-road mobile and stationary source emissions including the proper maintenance of equipment, use of electricity from power poles instead of generators, construction traffic control plans, and idling restrictions. Mitigation Measure AQ-8 requires construction-related air quality analyses for proposed development projects that are subject to CEQA. Implementation of Mitigation Measure AQ-8 would ensure that specific impacts would be identified and mitigated to the extent feasible for future development projects. It should be noted that the policies and mitigation measures within The Fullerton Plan were drawn from the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (May 6, 2005), prepared by the SCAQMD. Future development projects would be required to comply with all applicable SCAQMD rules and regulations.

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April 5, 2012

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

RE: SCAG Comments on the Draft Environmental Impact Report for The Fullerton Plan Project [I20120051]

Dear Ms. Allen:

Thank you for submitting the **Draft Environmental Impact Report for The Fullerton Plan Project [I20120051]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines. SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Sections 65080 and 65082.¹ As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed the DEIR for The Fullerton, and determined that this proposed project is regionally significant per CEQA Guidelines, Sections 15125 and 15206. The Fullerton Plan is a comprehensive update of the 1996 General Plan and a comprehensive and internally consistent plan to guide the City's decision-making and development processes through to the General Plan Horizon Year (2030).

We have evaluated the proposed project based on the policies of SCAG's 2008 RTP and Compass Growth Vision Principles that may be applicable to this project. The RTP and Compass Growth Visioning Principles can be found on the SCAG web site at: <http://scag.ca.gov/igr>. The attached detailed comments are intended to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the 2008 RTP to aid with demonstrating consistency with regional plans and policies. Please send a copy of the Final Environmental Impact Report (FEIR) to the attention of Pamela Lee at SCAG, 818 W. 7th St., 12th floor, Los Angeles, California, 90017. If you have any questions regarding the attached comments, please contact Ms. Lee at (213) 236-1895. Thank you.

Sincerely,

JACOB LIEB, Manager
 Environmental and Assessment Services

¹ SCAG is further responsible under state law (Senate Bill 375; Steinberg, 2008) for preparation of a Sustainable Communities Strategy (SCS) as part of the RTP. SCAG is required to update the RTP every four years. The 2012-2035 RTP/SCS is scheduled for adoption by the SCAG Regional Council on April 4, 2012.

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE THE FULLERTON PLAN (GENERAL PLAN UPDATE) [I20120051]**

PROJECT LOCATION

The City of Fullerton is located within the northern portion of Orange County, California, approximately 26 miles southeast of Downtown Los Angeles and approximately 12 miles north of Santa Ana. Regional access to the City is provided via the Orange Freeway (State Route 57), which is located near the City's eastern boundary, and the Riverside Freeway (SR-91), which forms the City's southern boundary. The Santa Ana Freeway (Interstate 5) is situated at the southwest corner of the City.

PROJECT DESCRIPTION

The Fullerton Plan (General Plan Update) is a comprehensive update of the 1996 General Plan. The purpose of The Fullerton Plan is to provide the City Council, Planning Commission, and Staff, and 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 Fullerton Plan begins with a Vision- a statement of what Fullerton hopes to become through the implementation of the Plan. The Fullerton Vision is then followed by four Master Elements, each containing related chapters: The Fullerton Built Environment; The Fullerton Economy; The Fullerton Community; and The Fullerton Natural Environment. Each chapter or element within The Fullerton Plan contains one or more goals and associated policies and actions to achieve those goals, which in turn support The Fullerton Vision. The Goals, Policies, and Actions work together to guide the City's future decisions and growth. The Fullerton Implementation Strategy chapter addresses the methods by which the policies and actions can achieve The Fullerton Plan goals, provides a short-term action plan to implement the specific Actions within three to five years, and demonstrates how the City will monitor its progress in achieving those goals.

Major components of The Fullerton Plan include:

- Update of existing conditions, with year 2010 serving as the baseline year.
- Communicate the "vision for Fullerton" through a Vision Statement to establish a community-based foundation that captures the city's qualities, values, and characteristics, now and in the future
- Update of the Land Use Element (i.e., Community Development and Design Chapter), including the establishment of allowable residential densities and non-residential intensities.
- Rename the 1996 General Plan "land use designations" to "community development types." These will continue to function as land use designations pursuant to General Plan law.
- Create two new community development types (i.e. Neighborhood Center Mixed-Use and Urban Center Mixed-Use); given the 1996 General Plan land use designations do not encompass the higher end of the density/intensity range now desired for specific areas of the City.

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The Draft Environmental Impact Report (DEIR) should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

G2

G3

Adopted SCAG Regionwide Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted Orange County Council of Governments Subregion Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	3,314,948	3,451,757	3,533,935	3,586,285	3,629,540	3,653,988
Households	1,039,201	1,071,810	1,088,375	1,102,370	1,110,659	1,118,490
Employment	1,755,167	1,837,771	1,897,352	1,933,058	1,960,633	1,981,901

Adopted City of Fullerton Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	142,939	146,194	148,862	150,411	152,495	153,397
Households	46,882	47,575	47,771	47,995	48,449	48,738
Employment	73,016	73,821	75,385	75,774	76,499	76,628

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

SCAG Staff Comments:

Pages 5.2-5, 5.2-7 and 5.2-8 indicate that the DEIR population, household and employment analyses were based on 2008 RTP Regional Growth Forecasts.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. The 2008 RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The 2008 RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the 2008 RTP are the following:

Regional Transportation Plan Goals:

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

SCAG Staff Comments:

Where applicable, SCAG staff finds that the proposed project meets consistency with Regional Transportation Plan Goals. The proposed project is not applicable to RTP G7 in that it is not a transportation project.

Per RTP G1, SCAG staff finds the proposed project to meet consistency. The proposed project focuses on providing adequate transit, bicycle and pedestrian facilities to serve the needs of the

G3

G4

community and to support development within key areas of the City and aims to support a multi-modal transportation network and implementation of complete streets to provide sufficient mobility. Regional access is also provided via the Orange Freeway (SR-57), Riverside Freeway (SR-91) and Santa Ana Freeway (I-5) to the City of Fullerton.

In regards to RTP G2, the proposed project is consistent. Several proposed General Plan Update policies and actions include safety measures such as supporting projects, programs, policies and regulations to make bicycling and intersection crossings safer (Page 5.4-64).

SCAG staff finds the proposed project to be consistent with RTP G3. The proposed project includes a Capital Improvement Program which will evaluate and prioritize infrastructure maintenance, replacement and improvement which will maintain the overall performance and ensure the sustainability of the regional transportation system (Page 5.1-46).

SCAG staff finds the proposed project meets consistency with RTP G4. The proposed project will provide additional intersection capacity and will also support using an integrated approach by considering automobile drivers, transit passengers, bicyclists and pedestrians rather than auto-centric thresholds to mitigate traffic impacts that would decrease the productivity of the regional transportation system (Page 5.4-70).

G4

SCAG staff finds the proposed project to meet consistency with RTP G5. The proposed project includes in its P1.3 Protection and Restoration of Natural Resources Policy, "to protect, and where applicable, restore the natural landscape, topography, drainage ways, habitat and other natural resources when planning improvements to existing and new neighborhoods and districts"(Page 5.11-27).

Per RTP G6, SCAG staff finds the proposed project to meet consistency. The proposed project includes The Growth Management Element that is intended to ensure that infrastructure planning meets the needs of current and future residents by setting forth policy related to growth management and providing implementation and monitoring provisions. Also, the proposed projects Policy P7.1, supports regional growth and development within areas that can be adequately served by existing and planner infrastructure systems (Page 5.1-34).

COMPASS GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain the region's mobility, livability and prosperity for future generations. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

G5

Principle 1: Improve mobility for all residents.

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices*

SCAG Staff Comments:

SCAG staff finds that the proposed project meets consistency with Principle 1, where applicable.

Per GV P1.1, SCAG staff finds the proposed project meets consistency. The proposed project includes The Growth Management Element that is intended to ensure that infrastructure planning meets the needs of current and future residents by setting forth policy related to growth management and providing implementation and monitoring provisions. Also, the proposed projects Policy P7.1, supports regional growth and development within areas that can be adequately served by existing and planner infrastructure systems (Page 5.1-34).

In regards to GV P1.2, SCAG staff finds the proposed project to be consistent. On page 5.2-15, it specifically states, "With the forecast employment growth resulting from [proposed] project implementation, much of the resident labor force would likely remain in Fullerton due to the availability of local jobs. This would be in furtherance of stabilizing the City's jobs-housing balance".

G5

SCAG staff finds the proposed project to be consistent with GV P1.3. The proposed project aims to promote a development pattern that encourages and supports non-automobile transportation by development neighborhood characteristics that encourage walking and bicycling and creating greater linkages between land use and transit, as well as other modes of transportation through its Policy P1.7 (Page 5.1-35).

In regards to GV P1.4, the proposed project meets consistency. Stated on Page 5.4-63, the proposed project, "focuses on providing adequate transit, bicycle and pedestrian facilities to serve the needs of the community and support a multi-modal transportation network and implementation of complete streets".

Principle 2: Foster livability in all communities.

- GV P2.1** *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2** *Promote developments, which provide a mix of uses.*
- GV P2.3** *Promote "people scaled," walkable communities.*
- GV P2.4** *Support the preservation of stable, single-family neighborhoods.*

SCAG Staff Comments:

SCAG staff finds that the proposed project meets consistency with Principle 1, where applicable.

Per GV P2.1, SCAG staff finds the proposed project to be consistent. Policy 3.4 states that the proposed project, "will facilitate infill development and infill residential development through proactive and coordinated efforts with the Redevelopment Agency, Planning Division, private development and non-profit entities and any other housing related groups to encourage the construction of residential development affordable to extremely-low, very-low, low and moderate income households" (Page 5.1-41).

G6

In regards to GV P2.2, SCAG staff finds the proposed project to be consistent. The proposed project includes a Downtown Mixed Use land use type that is a category designed to support and provide a mix of retail, professional office, commercial support, institutional and higher density residential uses located on the same parcel combined in the same building, or within the same project area (Page 5.1-13).

SCAG staff finds the proposed project to be consistent with GV P2.3. Implementation of the proposed project will include sidewalk and pedestrian facilities on major streets within residential neighborhoods throughout the city. The DEIR specifically states, "The Fullerton Plan encourages increased pedestrian activity through enhanced pedestrian facilities to support walkability and connectivity" (Page 5.4-63).

SCAG staff finds the proposed project to be consistent with GV P2.4. Policy 3.17 of the proposed

project aims to encourage the conservation, preservation and enhancement of the City's historic residential neighborhoods (Page 5.1-36). Zone Classification R-1P (Single-Family Residential Preservation) included in the proposed project is also a zone classification where mature single-family neighborhoods and existing housing is considered a valuable asset to the city and preserved. (Page 5.1-15).

G6

Principle 3: Enable prosperity for all people.

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 *Encourage civic engagement.*

SCAG Staff Comments:

SCAG staff finds that the proposed project partially meets consistency with Principle 3, where applicable.

SCAG staff finds the proposed project to be consistent with GV P3.1. As stated on page 5.2-10, the proposed project includes a variety of land uses types intended to provide a range of housing types to meet the varying needs of the City's residents.

SCAG staff cannot determine consistency with GV P3.2, GV P3.3 and GV P3.4 based on the information provided in the DEIR.

Per GV P3.5, SCAG staff finds the proposed project to be consistent. Policy P18.3 included in the proposed project encourages opportunities for community involvement by, "supporting policies, projects, programs and regulations that maximize opportunities for public participation in planning and decision-making processes pertaining to community development and design, including outreach to members of underrepresented communities" (Page 5.1-48).

G7

Principle 4: Promote sustainability for future generations.

- GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2 *Focus development in urban centers and existing cities.*
- GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 *Utilize "green" development techniques*

SCAG Staff Comments:

Where applicable, SCAG staff finds that the project is consistent with Principle 4, where applicable.

SCAG staff finds the proposed project to be consistent. Policies P24.1, P24.2 and P24.3 included in the proposed project aim to support projects, programs, policies and regulations to increase access, preserve, manage and maintain open spaces within the project area (Page 5.1-52).

SCAG staff finds the proposed project to meet consistency with GV P4.2. The proposed project is located within the City of Fullerton located in an urbanized portion of north Orange County (Page 5.1-21).

G8

Per GV P4.3 and GV P4.4, SCAG staff finds the proposed project to meet consistency. The proposed project will encourage and promote practices and technologies to reduce the amount of waste disposed in landfills per Policy 23.3. Through Policy 3.24, the proposed project encourages clean technology and sustainable industries, such as renewable energy companies, "green" product manufacturing and other emerging industries and green technologies and services. Sustainable development practices will also be encouraged through Policy 19.7 within the proposed project area.

G8

CONCLUSION

Where applicable, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and also meets consistency with Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here:
http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

G9

When a project is of statewide, regional, or area wide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with Public Resource Code Section 21081.7, and CEQA Guidelines Section 15097 (g).



G. RESPONSES TO COMMENTS FROM JACOB LIEB, MANAGER ENVIRONMENTAL AND ASSESSMENT SERVICES, SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS, DATED APRIL 5, 2012

- G1. The comment notes that SCAG staff has reviewed The Fullerton Plan and determined the proposed project to be regionally significant per the California Environmental Quality Act (CEQA). SCAG has evaluated the project based on the policies of SCAG's 2008 Regional Transportation Plan (RTP) and Compass Growth Visioning Principles, as referenced in the following responses to comments. SCAG also encourages the use of SCAG's List of Mitigation Measures extracted from the RTP. As indicated in Draft EIR Section 5.1, Land Use and Planning, with implementation of mitigation measures, the proposed project would be consistent with SCAG's relevant goals and principles.
- G2. This comment is a restatement of the proposed project description and does not raise new environmental information or directly challenge information provided in the Draft EIR. No further response is necessary.
- G3. The comment states the Draft EIR should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household, and Employment Forecasts. The comment further notes that pages 5.2-5, 5.2-7, and 5.2-8 of the Draft EIR indicate that the population, household, and employment analyses were based on the 2008 RTP Regional Growth Forecasts. No further response is necessary.
- G4. The comment identifies the relevant goals and policies of the 2008 RTP to the proposed project and provides an analysis of the proposed project's consistency with these goals and policies. SCAG's analysis determined that the proposed project meets consistency with the RTP goals, and that RTP Goal G7 is not applicable. The comment does not raise new environmental information or directly challenge information provided in the Draft EIR. No further response is necessary.
- G5. The comment identifies Regional Growth Principle 1 and associated strategies as relevant to the proposed project. The comment notes that SCAG staff finds that the proposed project meets consistency with Principle 1. The comment does not raise new environmental information or directly challenge information provided in the Draft EIR. No further response is necessary.
- G6. The comment identifies Regional Growth Principle 2 and associated strategies as relevant to the proposed project. The comment notes that SCAG staff finds that the proposed project meets consistency with Principle 2. The comment does not raise new environmental information or directly challenge information provided in the Draft EIR. No further response is necessary.
- G7. The comment identifies Regional Growth Principle 3 and associated strategies as relevant to the proposed project. The comment notes that SCAG staff finds that the proposed project partially meets consistency with Principle 3. SCAG staff cannot determine consistency with GV P3.2, GP P3.3 and GP P3.4 based on information provided in the Draft EIR. It is noted that the Draft EIR provided a consistency analysis



and determine the proposed project would be consistent with these strategies. No further response is necessary.

- G8. The comment identifies Regional Growth Principle 4 and associated strategies as relevant to the proposed project. The comment notes that SCAG staff finds that the proposed project meets consistency with Principle 4. The comment does not raise new environmental information or directly challenge information provided in the Draft EIR. No further response is necessary.
- G9. The comment states that where applicable, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and also meets consistency with Compass Growth Visioning Principles. Further, the comment states that all feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA and recommends review of the SCAG List of Mitigation Measures for additional guidance. As indicated in Draft EIR Section 5.1, *Land Use and Planning*, with implementation of mitigation measures, the proposed project would be consistent with SCAG's relevant goals and principles. No further mitigation measures are required. In accordance with *CEQA Guidelines* Section 15091 (Findings), when making findings, the City would be required to also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. This would occur as part of the project approval process.

The comment also states that when a project is of statewide, regional, or area wide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available. The comment does not raise new environmental information or directly challenge information provided in the Draft EIR. No further response is necessary.



AIRPORT LAND USE COMMISSION

FOR ORANGE COUNTY

3160 Airway Avenue • Costa Mesa, California 92626 • 949.252.5170 fax: 949.252.6012

April 5, 2012

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

Subject: DEIR for the City of Fullerton General Plan Update

Dear Ms. Allen:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the City of Fullerton General Plan Update in the context of the Airport Land Use Commission (ALUC) for Orange County's *Airport Environs Land Use Plan (AELUP) for Fullerton Municipal Airport (FMA)* and the *AELUP for Heliports*. Included below are our comments on the DEIR.

The environmental document contains analysis of the noise, height restriction and safety policies contained in the *AELUP for FMA*. However, please note that although residential uses within the 65 dB CNEL are described as conditionally consistent in the *AELUP*, the Airport Land Use Commission has consistently recommended that no new residential units be permitted within this noise contour. Therefore, it is requested that Mitigation Measure N-5 reflect that no new residential uses will be permitted within the 65 dB CNEL contour for FMA.

H1

Regarding height restrictions around FMA, we appreciate that the DEIR includes language referring to the Federal Aviation Administration (FAA) Federal Aviation Regulations (FAR) Part 77 imaginary surfaces, the ALUC for Orange County requirements, and to Public Utilities Code Section 21676. One height restriction issue that has historically been identified by the ALUC is that certain projects do not require processing of a general plan amendment or zone change/specific plan amendment and would, therefore, not trigger ALUC review even if the project were impeding airport operations. Please add a mitigation measure to ensure that projects requiring other City approvals would not create a hazard to air navigation. We recommend that the mitigation include wording specifying that structures will not penetrate the FAA FAR Part 77 Obstruction Imaginary Surface for FMA.

H2

With respect to building heights throughout Orange County, development proposals including the construction or alteration of structures more than 200 feet above ground level, require filing with the Federal Aviation Administration (FAA) and review by the ALUC. Projects meeting this threshold must comply with procedures provided by Federal and State law, with the referral requirements of ALUC, and with all conditions of approval imposed or recommended by FAA and ALUC including filing a Notice of Proposed Construction or Alterations (FAA Form 7460-1). It is suggested that the City add a mitigation specifying that development projects meeting this 200' height threshold are required to file FAA Form 7460-1.

H3

We also suggest adding a mitigation measure requiring a Disclosure Notice of “airport in the vicinity,” to be provided in future sales literature and sales/rental/lease agreements for residential developments within the *FMA AELUP* Airport Planning Area, stating that the property is located in the vicinity of FMA.

H4

A mitigation measure is also suggested for signage on all parks and recreational development within the *FMA AELUP* Airport Planning Area requiring every local park, recreational area, and private recreational facility to place appropriate signage indicating the presence of operating aircraft.

H5

Additionally, the DEIR should identify if the City allows for the development of heliports as defined in the *AELUP for Heliports*. Should the development of heliports occur within your jurisdiction, proposals to develop new heliports must be submitted through the City to the ALUC for review and action pursuant to Public Utilities Code Section 21661.5. Proposed heliport projects must comply fully with the state permit procedure provided by law and with all conditions of approval imposed or recommended by FAA, by the ALUC for Orange County and by Caltrans/Division of Aeronautics. The DEIR should address whether the development of heliports will be allowed within any of the proposed focus areas.

H6

A referral by the City to the ALUC is recommended for this project due to the location of the proposal within an AELUP Planning Area and that the proposed project is a general plan amendment under PUC Section 21676(b). In this regard, please note that the Commission wants such referrals to be submitted and agendized for ALUC consideration between the Local Agency’s expected Planning Commission and City Council hearings. Since the ALUC meets on the third Thursday afternoon of each month, submittals must be received in the ALUC office by the first of the month to ensure sufficient time for review, analysis, and agendizing.

H7

Thank you for the opportunity to comment on this DEIR. Please contact me at (949) 252-5170 or via email at krigoni@ocair.com if you need any additional details or information regarding the future referral of your project.

Sincerely,



Kari A. Rigoni
Executive Officer



H. RESPONSES TO COMMENTS FROM KARI A. RIGONI, EXECUTIVE OFFICER, AIRPORT LAND USE COMMISSION FOR ORANGE COUNTY, DATED APRIL 5, 2012

- H1. Comment noted. The City will evaluate site-specific developments on a project-by-project basis to ensure appropriate measures are implemented in order for the residential uses to conform to the applicable land use compatibility noise standards.
- H2. The Fullerton Plan does not propose site-specific development. Individual development projects would be reviewed on a project-by-project basis to determine applicability and consistency with the AELUP, as required by Fullerton Municipal Code Section 15.56.050. Fullerton Municipal Code Section 15.56.050 requires that proposed development and activities that would take place within the *Airport Environs Land Use Plan* (AELUP) planning area be reviewed by the ALUC, as specified in Chapters 2, 3 and 4 of the AELUP. Furthermore, development projects which would exceed 200 feet above ground level at their sites must undergo FAA review and may require referral to the ALUC. Additionally, any amendment to a City's General or Specific Plan, Airport Master Plan, or Zoning Ordinance must be submitted to the ALUC for a determination prior to its adoption by the City.
- H3. Refer to Response to Comment H2.
- H4. The Fullerton Plan does not propose site-specific development. Individual development projects would be reviewed on a project-by-project basis to determine applicability and consistency with the AELUP, as required by Fullerton Municipal Code Section 15.56.050. Disclosure notices would be considered on a project-by-project basis.
- H5. Refer to Response to Comment H4. Additionally, there are no existing parks in the Land Use Runway Protection Zone (RPZ), Airport Protection Zone II or 60 to 70 CNEL noise contours.
- H6. The comment is acknowledged. The Fullerton Plan does not propose site-specific development, nor does it specifically allow for or identify the location of potential heliports within the City. Individual development projects would be reviewed on a project-by-project basis to determine applicability and consistency with the AELUP, as required by Fullerton Municipal Code Section 15.56.050.
- H7. The Fullerton Plan is scheduled to be considered by the Airport Land Use Commission on April 19, 2012.



City of Anaheim
PLANNING DEPARTMENT

April 5, 2012

City of Fullerton
 303 West Commonwealth Avenue
 Fullerton, California 92832
 Att: Heather Allen, AICP, Planning Manager

**RE: Notice of Availability/Notice of Completion of Draft Environmental Impact Report
 (SCH No. 2011051019)**

Dear Ms. Allen:

Thank you for the opportunity to review and comment on "The Fullerton Plan" DEIR. City of Anaheim staff offers the following comments:

1. The Public Works Department offers the following comments:

- **Traffic Engineering:** For any development forecasted to generate more than 100 peak hour trips in the Harbor Gateway, Southeast Industrial, or Orangethorpe Corridor Nodes Focus Areas, the City of Fullerton shall submit multi modal analyses for review by the City of Anaheim. The deficient intersections identified in the Fullerton Plan 2030 that are located in the City of Anaheim, including Caltrans controlled intersections, shall be analyzed to determine if any coordination is needed with the City of Anaheim to implement improvements to ensure sufficient capacity will exist at the deficient intersections. The City of Anaheim requests that the following statement be added to the end of Mitigation Measure TR-1:

"The multi modal analyses will 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 areas."

The City of Anaheim also requests that the following mitigation measure be added to the DEIR:

"TR-2: In conjunction with the preparation of any multi modal analyses as required in Mitigation Measure TR-1, the City of Fullerton shall coordinate with the City of Anaheim to assess potential project impacts for any development forecasted to generate more than 100 peak hour trips in the Harbor Gateway, Southeast Industrial, or Orangethorpe Corridor Nodes Focus Areas. Improvements to mitigate significant impacts and the associated fair share costs shall be developed in coordination with the City of Anaheim."

- Design Services: The Public Works, Design Services Division, requests that the following two mitigation measures of the DEIR be modified (proposed changes are in *italic underline*)

WW-1: Prior to issuance of a building permit for any future development project, the Project Applicant shall prepare an engineering study to support the adequacy of the sewer systems and submit the engineering study to the City for review and approval. Any improvements recommended in the engineering study shall be installed prior to the certificate of occupancy for the development project. *For any new sewer projects/studies that have the potential to impact the City of Anaheim's sewer systems, the developer shall submit said studies to the City of Anaheim Public Works Department for review and approval.*

12

HYD-3: Prior to site plan approval, the project owner/developer(s) shall be required to coordinate with the City of Fullerton Engineering Department to determine requirements necessary to mitigate impacts to drainage improvements in order to accommodate storage volumes and flood protection for existing and future runoff. Proposed projects shall implement mitigation measures, if required, to the satisfaction of the City of Fullerton Public Works Director. *For any new storm drainage projects/studies that have the potential to impact the City of Anaheim's storm drainage systems, the developer shall submit said studies to the City of Anaheim Public Works Department for review and approval.*


Should you have any questions regarding these Public Works related comments, please contact Raul Garcia, Principal Civil Engineer, at (714)765-5255.

2. The Community Services Department, Parks Division, looks forward to working with the City of Fullerton on important bike and pedestrian connections between the two cities in conjunction with the current planning project called the Anaheim Outdoors Connectivity Plan. Should you have any questions regarding these park-related comments, please contact Pamela Galera, Principal Project Planner, at (714) 765-4463.

13

Please forward any subsequent public notices and/or environmental documents regarding this project to my attention at the address listed on the first page. If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5016.

Sincerely,



for Jonathan Borrego

Jonathan E. Borrego, AICP
Principal Planner

cc: Raul Garcia -- Public Works Department
Pamela Galera -- Community Services Department



I. RESPONSES TO COMMENTS FROM JONATHAN E. BORREGO, AICP, PRINCIPAL PLANNER, CITY OF ANAHEIM, DATED APRIL 5, 2012

11. Draft EIR Mitigation Measure TR-1 will 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.

12. Draft EIR Mitigation Measure WW-1 will be revised in the Final EIR, as follows:

WW-1 Prior to issuance of a building permit for any future development project, the Project Applicant shall prepare an engineering study to support the adequacy of the sewer systems and submit the engineering study to the City of Fullerton for review and approval. Any improvements recommended in the engineering study shall be installed prior to the certificate of occupancy for the development project. For any sewer projects/studies that have the potential to impact adjacent jurisdictions' sewer systems, the developer shall submit said studies to the applicable jurisdiction for review and approval.



Draft EIR Mitigation Measure HYD-3 will be revised in the Final EIR, as follows:

HYD-3 Prior to site plan approval, the project owner/developer(s) shall be required to coordinate with the City of Fullerton Engineering Department to determine requirements necessary to mitigate impacts to drainage improvements in order to accommodate storage volumes and flood protection for existing and future runoff. Proposed projects shall implement mitigation measures, if required, to the satisfaction of the City of Fullerton Public Works Director. For any new storm drainage projects/studies that have the potential to impact adjacent jurisdictions' storm drainage systems, the developer shall submit said studies to the applicable jurisdiction for review and approval.

13. The comment is acknowledged. No further response is necessary.



City of Brea

April 5, 2012

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

VIA EMAIL

Dear Ms. Allen:

The City of Brea appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the City of Fullerton's General Plan Update "The Fullerton Plan." We have reviewed the document and commend Fullerton for their efforts to address the challenges facing all our communities as we move forward in this time of reduced resources and increasing constraints. The commitment to working with the other North Orange County cities is appreciated and reflective of our current activities together.

In reviewing the document, we did identify one traffic related impact that requires further clarification. The information provided for the intersection of Brea Boulevard and Imperial Highway (#62) on page 5.4-44, Table 5.4-9, page 5.4-52 indicate this intersection will have significant unavoidable impacts (LOS E) from the Fullerton Plan after mitigation. The mitigation measure TR-1 calls for future studies using multi-model analysis to determine mitigation measures. It seems this could be considered deferral of mitigation and we seek a further understanding of your proposed approach to this issue.

J1

The City of Brea respectfully requests clarification regarding the plan for coordinating determination of feasible mitigation measures for this intersection located in our community prior to the certification of this EIR and adoption of the Fullerton Plan.

The City also requests clarification regarding the cumulative impact summary found on pages 5.4-70, 71. In this section the Brea Boulevard/Imperial Highway intersection is not identified as having significant unavoidable impacts. It would be helpful to understand what assumptions regarding future traffic conditions and infrastructure capacity result in the change in status for this intersection.

J2

In closing, we appreciate the close relationship our communities have shared and welcome the opportunity to work together to clarify the future configuration and capacity of the intersection of Brea Boulevard and Imperial Highway. Please feel free to reach me at (714) 990-7674 if you should have any questions.

City Council **Don Schweitzer**
 Mayor

Brett Murdock
 Mayor Pro Tem

Ron Garcia
 Council Member

Roy Moore
 Council Member

Marty Simonoff
 Council Member

Sincerely,



David M. Crabtree, AICP
Community Development Deputy Director

CC Eric Nicoll, Community Development Director
Charles View, Public Works Director
Chino Consunji, Public Works Deputy Director
Warren Siecke, City Traffic Engineer

DMCs/david/envio/4.4.12fullertoncommentltr



J. RESPONSES TO COMMENTS FROM DAVID M. CRABTREE, AICP, COMMUNITY DEVELOPMENT DEPUTY DIRECTOR, CITY OF BREA, DATED APRIL 5, 2012

- J1. The Fullerton Plan maintains the currently adopted underlying land use designations pursuant to the 1996 General Plan (and subsequent amendments). Although descriptions and images of intended form and character have been added to guide development, for parcels that are within a Focus Area Overlay Designation, the underlying community development type applies until a specific plan, master plan, or other implementing document is prepared through a community-based planning process, at which point a General Plan Amendment would be adopted to re-designate the land, if necessary. The Fullerton Plan identifies the growth anticipated to occur within the Focus Areas; however, this growth would not be realized until implementation of the focused development strategy, which would occur through future community-based planning efforts, with individualized approaches for each area.

The traffic buildout analysis assumes the growth anticipated within the Focus Areas, following the community-based planning efforts. Because the traffic buildout analysis is based on a traditional traffic volume “build-up method,” in which a straight-line traffic growth in automobile traffic and the auto-related trips associated with future development are added to existing traffic, the potential traffic benefits of the emerging sustainability mentality and a society trending toward multi-modal solutions, such as enhanced pedestrian, bicycle, and transit; improved connectivity between rail or transit centers and target destinations; shorter commute trips; an aging population with reduced driving habits; and other emerging trends are not reflected. The traffic forecasts, therefore, provide a conservative, worst-case estimate of future traffic volumes, based on traditional automobile-focused assumptions.

The traditional approach to mitigating deficient LOS conditions is to provide additional intersection capacity (i.e., intersection widening, additional lanes), which could, in turn, have right-of-way impacts at some locations. Fullerton and the surrounding communities are relatively built out with mature land uses and an established transportation system. New roadways or major widening projects are not feasible or generally preferred. Further, it is not possible to accurately predict the exact improvements required at each intersection in the long-term, as the type of development, timing of development, and conditions at the time in which the development would occur are not currently known. Therefore, The Fullerton Plan supports analyzing and evaluating urban streets using an integrated approach that considers the points of view of automobile drivers, transit passengers, bicyclists and pedestrians rather than auto-centric thresholds which conflict with other policies of The Fullerton Plan – including better environments for walking and bicycling, safer streets, increased transit use, cost-effective infrastructure investments, reduced greenhouse gas emissions, and the preservation of open space (Policy P5.12). Thus, as future planning efforts occur within the Focus Areas, detailed multi-modal analysis would be required in order to determine specific impacts associated with proposed development and where mitigation is found to be needed, alternative mitigation in lieu of capacity improvements would be encouraged (Mitigation Measure TR-1). Such mitigation could include providing or contributing to a circulator shuttle or transit system between activity centers and rail or transit centers; improved walking and biking facilities; and encouraging mixed-use and higher-density developments in order to



facilitate on-site trip purpose capture. Such measures would have the dual benefit of avoiding or reducing right-of-way impacts, and at the same time reducing the dependence on the automobile, which would reduce traffic impacts and further the vision of The Fullerton Plan. However, it is noted that impacts to the 35 identified intersections would remain significant and unavoidable.

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.

- J2. Draft EIR Page 5.4-71 identifies the Imperial Highway and Brea Boulevard intersection as having a significant impact under cumulative Buildout 2030 and cumulative conditions. This is consistent with the impact identified for Buildout 2030 conditions in Table 5.4-9.

Diane Bonanno

4611 Santa Fe Street, Yorba Linda, CA 92886
714-572-9911 dianebon@earthlink.net



April 5, 2012

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

Re: Draft Environmental Impact Report, SCH No. 2011051019
The Fullerton General Plan Update

Dear Ms. Allen,

I am submitting comments to the above DEIR for the Fullerton General Plan Update. Specifically I refer to Focus Area 12, West Coyote Hills. Many in the community spoke up for the area to become a focus area and the GPAC did make it one. However, after this action was taken, there was little to no discussion of the best use of West Coyote Hills for the citizens of Fullerton. Isn't the purpose of designating a focus area to seriously look at its best use for city residents? Instead Focus Area 12 was simply re-designated "Greenbelt Development" as it had been since 1977. This designation is 35 years old, dating from the misty past when Fullerton was a vastly different city than it is today.

My point is that the West Coyote Hills Focus Area 12 deserves discussion, analysis and the public input that it was not given when the greenbelt development designation was simply carried forward from a three decades ago. In 2010 the City Council voted to deny a development proposal for this land. Then the landowner filed what many consider a frivolous lawsuit against the city and in 2011 a new City Council voted to approve the same development. Subsequently more than 10,000 voters qualified a referendum to overturn the council's latest decision.

The use of the West Coyote Hills land must be given serious consideration, especially given the 2030 build out projections of

- 22 percent population increase,
- 22 percent growth in housing,
- 23 percent square feet of buildings in non-residential land uses.

K1

Fullerton will need **more**, not less quality open space at build-out. Indeed the population of Fullerton has already significantly increased in the last 35 years. With increased population density comes an increased need for parks and open space for the public's health and welfare.

K1

The 35-year-old West Coyote Hills Focus Area 12 Overlay Designation must not be rubber stamped and allowed to go forward. Given the growth that has already occurred in the last 35 years and the projected growth at 2030, this important focus area must be given the concentrated community-based planning effort that the people of Fullerton expect.

I respectfully ask that these comments become part of the Administrative Record for the above named Draft EIR.

Sincerely,

A handwritten signature in blue ink that reads "Diane Bonanno". The signature is written in a cursive, flowing style.

Diane Bonanno

From: "Heather Allen" <HeatherA@ci.fullerton.ca.us>
To: "Joan Wolf" <JoanW@ci.fullerton.ca.us>, <MLIEBERMAN@rbf.com>
Date: 4/5/2012 5:59 PM
Subject: FW: DEIR, General Plan SCH No. 2011051019

From: Diane Bonanno [mailto:dianebon@earthlink.net]
Sent: Thursday, April 05, 2012 4:40 PM
To: Heather Allen
Subject: DEIR, General Plan SCH No. 2011051019

Hi Heather,

I have one additional comment to the General Plan Draft EIR, SCH No. 2011051019

In looking over the biological section, I noticed that the classifications of types of coastal sage scrub included several that classified various types as disturbed. This is not a classification that is recognized by any authority. The only place that I have seen it is in the West Coyote Hills various DEIRs. I think it was contrived to mislead the public about the condition of the various categories of Coastal Sage Scrub. This should be changed to conform to DFG and USFWS accepted classifications.

K2

Please add this comment to the Administrative Record. Thank you,

Diane Bonanno

dianebon@earthlink.net



K. RESPONSES TO COMMENTS FROM DIANE BONANNO, DATED APRIL 5, 2012

- K1. This comments pertains the West Coyote Hills Focus Area and its designation in The Fullerton Plan. 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.
- K2. The use of the word “disturbed” with a recognized classification is common practice with biologists and indicates quality. Draft EIR Section 5.11, *Biological Resources*, further describes the habitat within the area and its likelihood to support endangered/sensitive species.

April 6, 2012



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Ms. Heather Allen, AICP
City of Fullerton
303 W. Commonwealth Avenue
Fullerton, CA 92832
HeatherA@ci.fullerton.ca.us

Re: Comments on the Fullerton General Plan and EIR

Dear Ms. Allen:

Thank you for the opportunity to comment on the Fullerton General Plan and Draft Environmental Impact Report (DEIR). Friends of Harbors, Beaches, and Parks (FHBP) is based in Newport Beach, CA and we work to protect the natural lands, waterways, and beaches of Orange County. Our organization includes support from 5,000 residents and more than 80 conservation organizations. We are writing to provide feedback during the public comment period for the DEIR.

We applaud your efforts to reduce the greenhouse gas emissions for the City of Fullerton. As you are likely aware, there are very few cities in the County that have created a Climate Action Plan (CAP) (or similar document). We believe this is a necessary first step to meeting the mandate of AB 32 – The Global Warming Solutions Act of 2006. It will also be helpful that the CAP is structured in such a way to allow for on-going updates.

L1

In light of the requirements of AB 32 and SB 375 – The Sustainable Communities Act of 2008, we were pleased to see Goal 3 of the Housing section and its related policies. Promoting infill development with the necessary active transportation and transit opportunities will both reduce vehicle miles traveled, as mandated by SB 375, and help reduce greenhouse gases, as mandated by AB 32. The strong implementation language in the policies, especially 3.4 (Facilitate Infill Development), will go a long way to ensuring Fullerton’s urban and downtown spaces are efficiently and effectively utilized and make it easier to get from Point A to Point B without creating a dependence on automobile transport.

L2

We were also pleased to see three goals of The Fullerton Plan supporting parks and open space. Goals 15,¹ 24² and 25³ are commendable goals shown in Table 3, page 24. These are also well supported by the Open Spaces and Natural Environment: Goal 24 and implementation policies: 24.2 and 24.7 (pg. 110); 24.8, 24.11 (pg. 111); and Goal 25 and its implementation policies: 25.1, 25.4, and 25.5 (pg. 112). As stated in the Biological Resources Section (5.11), page 5.11-23, “The remaining areas of the City are largely developed and surrounded by development,” meaning the last remaining undeveloped natural lands in the City of Fullerton are lands within the West Coyote Hills Focus Area. We support these goals, implementation policies and the conclusion about West Coyote Hills, but believe there may be an alternative scenario that could be considered for this site.

L3

Though it is understood that the West Coyote Hills development proposal by Pacific Homes has been approved by the City Council, and is now being legally contested by residents, it would seem appropriate (should the residents win) to actually protect this sensitive natural resource. Per the DEIR Biological Resources section and its long list of sensitive habitat types and threatened,

L4

¹ The Fullerton Community Section: Parks, recreational facilities, trails, and programs that promote a healthy community and a desirable quality of life, pg. 24.

² The Fullerton Natural Environment: Responsible management of open spaces balanced with the healthy functioning of environmental systems, pg. 24.

³ The Fullerton Natural Environment: Responsible management of natural resources, pg. 24.

endangered, or sensitive species,⁴ it would seem the development of the West Coyote Hills site would actually eliminate Fullerton's last remaining opportunity to protect a natural environment and thereby make Fullerton unable to meet its aforementioned goals (15, 24, and 25). Depending on the outcome of this legal challenge, there may be an opportunity to utilize some of the infill development sites in downtown Fullerton and offer a transfer of development rights to Pacific Coast Homes. This scenario would actually result in meeting more of The Fullerton Plan goals and policies than the current scenario which develops West Coyote Hills and removes the open space lands from the inventory. In this alternative scenario additional open space would be preserved and infill developments would be created in the urban areas of the city.

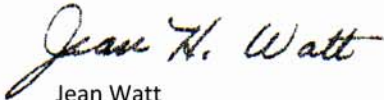
L4

With all due respect, we wholly disagree with 5.11.7 Significant Unavoidable Impacts and the conclusion that the build out of The Fullerton Plan would have no significant impacts on these biological resources. With the loss of threatened, endangered and sensitive species on the last remaining natural lands in the city, how could there not be significant impacts?

L5

Thank you for the opportunity to review the City's Plan and DEIR. We offer our assistance to help in developing creative solutions that both increase the open space and natural lands inventory of Fullerton, while at the same time creating a more efficient and vibrant downtown with a focus on infill development.

Sincerely,



Jean Watt
President

⁴ See Section 5.11.3 (Biological Resources) pp 5.11-6 through 5.11-21.



L. RESPONSES TO COMMENTS FROM JEAN WATT, PRESIDENT, FRIENDS OF HARBORS, BEACHES, AND PARKS, DATED APRIL 6, 2012

- L1. The comment is acknowledged. No further response is necessary.
- L2. The comment is acknowledged. No further response is necessary.
- L3. The comment is acknowledged. No further response is necessary.
- L4. The comment references the West Coyote Hills development proposal by Pacific Homes being legally contested by residents and the potential for transfer of development rights to Pacific Coast Homes to preserve the open space of the West Coyote Hill. The comment does not specifically pertain to information presented in the Draft EIR for The Fullerton Plan. The comment is acknowledged. No further response is necessary.
- L5. The comment disagrees with the conclusions that The Fullerton Plan would have no significant impacts of biological resources. As stated in Draft EIR Section 5.11, *Biological Resources*, the largest concentration of vacant land occurs within West Coyote Hills. West Coyote Hills is primarily undeveloped and consists of natural vegetation and habitat, including coastal sage scrub and riparian scrub habitats. Remaining vacant parcels within the City are primarily infill and occur in developed and urbanized areas containing no natural vegetation or habitat.

As indicated in the Draft EIR, future development within the West Coyote Hills Focus Area could involve significant impacts to special status species without the implementation of mitigation. Although The Fullerton Plan anticipates future development within the area, it does not propose site-specific development at this time. The Final Environmental Impact Report on Pacific Coast Home's West Coyote Hills project, certified by Resolution 2011-30, included a Biological Resources Assessment. Furthermore, Mitigation Measure BIO-1 requires a Biological Resource Assessment prepared by a qualified biologist to assess existing resources, the potential impacts associated with site-specific development, and identify mitigation measures to reduce potential impacts to a less than significant level (Mitigation Measure BIO-1). Additionally, The Fullerton Plan includes several policies for the protection of natural resources including Policy P1.3, which supports projects, programs, policies and regulations to protect, and where appropriate restore, the natural landscape, topography, drainage ways, habitat, and other natural resources when planning improvements to existing and new neighborhoods and districts and Policy P25.1, which supports regional and subregional efforts to conserve habitat for sensitive species and plant communities. Thus, implementation of The Fullerton Plan would result in less than significant impacts following compliance with Mitigation Measure BIO-1 and the goals, policies, and actions of The Fullerton Plan.

East Coyote Hills includes the Coyote Hills Golf Course, oil extraction facilities, residential homes, and approximately 120 acres of natural open space, including natural and revegetated coastal sage scrub. East Coyote Hills is not located within a Focus Area and has not been identified for future development by The Fullerton Plan. Thus, potential impacts to East Coyote Hills were determined to be less than significant.



Several sensitive plant and animal species are known or anticipated to occur within East Coyote Hills. Implementation of the Coyote Hills East Habitat Conservation Plan (HCP) would continue to protect special status species within this area.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

April 6, 2012

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

Subject: The Fullerton Plan 2030 (Fullerton General Plan Update)
SCH#: 2011051019

Dear Ms. Heather Allen:

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 April 5, 2012, 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."

M1

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,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

COMMUNITY
DEVELOPMENT

APR 09 2012

DEPARTMENT

**Document Details Report
State Clearinghouse Data Base**

SCH# 2011051019
Project Title The Fullerton Plan 2030 (Fullerton General Plan Update)
Lead Agency Fullerton, City of

Type EIR Draft EIR

Description Comprehensive General Plan Update. Anticipated growth over existing conditions: +10,183 dwelling units and +10,666,459 s.f. of non-residential uses (commercial, industrial, public/religious, open space/parks/recreation) within 12 Focus Areas: Airport Industrial; Commonwealth Corridor; Orangethorpe Corridor Nodes; Harbor Gateway; Downtown; Transportation Center; North Harbor Corridor; North Industrial; Chapman Corridor; Education; Southeast Industrial; West Coyote Hills.

Lead Agency Contact

Name Ms. Heather Allen
Agency City of Fullerton
Phone (714) 738-6884 **Fax** (714) 738-3110
email Heather@ci.fullerton.ca.us
Address 303 W. Commonwealth Avenue
City Fullerton **State** CA **Zip** 92832

Project Location

County Orange
City Fullerton
Region
Lat / Long
Cross Streets citywide
Parcel No. citywide
Township

Range

Section

Base

Proximity to:

Highways SR-91/SR-57/I-5
Airports Yes
Railways Yes
Waterways Yes
Schools Yes
Land Use Multiple General Plan and Zoning Designations

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

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 12; Department of Housing and Community Development; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 02/21/2012 **Start of Review** 02/21/2012 **End of Review** 04/05/2012



M. RESPONSES TO COMMENTS FROM SCOTT MORGAN, DIRECTOR, STATE CLEARINGHOUSE, STATE OF CALIFORNIA GOVERNOR'S OFFICE OF PLANNING AND RESEARCH, DATED APRIL 6, 2012

- M1. The comment acknowledges the closing of the public review period on April 5, 2012 and forwards comments received by the State Clearinghouse during that time. The comment notes that the City has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. This comment is acknowledged, and no revisions to the Draft EIR are necessary.

One State agency provided comments to the State Clearinghouse on the Draft EIR: Department of Toxic Substances Control. Refer to Comment Letter A and associated responses.



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April 10, 2012

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

Subject: Notice of Availability/Notice of Completion of a Draft Environmental Impact Report (DEIR) for the Fullerton Plan

Dear Ms. Allen,

The Orange County Transportation Authority (OCTA) has completed its review of the above referenced document. The following comments are provided for your consideration:

- Please note that a goal of the Orange County Master Plan of Arterial Highways (MPAH) is to maintain Level of Service D at MPAH intersections. N1
- Information regarding OCTA bus transit services and the bus routes map (Exhibit 5.4-3) are outdated. For the transit services identified on pages 5.4-26 through 5.4-29, please see pages one and two of the attachment for the up-to-date information. Page three of the attachment provides updated information for the bus routes map. N2

If you have any questions or comments, please contact me at (714) 560-5683 or clarwood@octa.net.

Sincerely,

Charlie Larwood
 Manager, Transportation Planning

CL:js
 Attachment

c: Ed Alegre, OCTA
 Phyllis Trudell, OCTA

CHIEF EXECUTIVE OFFICE

Will Kempton
 Chief Executive Officer

Information regarding OCTA bus transit services is outdated. Please update the OCTA section on pages 5.4-26 to 5.4-29 using OCTA's website at <http://www.octa.net/bus-service.aspx>. The following up-to-date information is provided.

Route #	Updated Information
Route 20	In service Monday through Friday with a headway of 100 minutes in each direction.
Route 24	Operates along Commonwealth Avenue and is in service Monday through Friday from 5:00 AM to 9:30 PM with a headway of approximately one hour. There is no weekend service provided on Route 24.
Route 25	Has a headway of approximately 45 minutes.
Route 26	Has a headway of one hour on weekends and holidays.
Route 30	Arrival frequency is normally 45 minutes.
Route 35	In service Monday through Friday from 4:30 PM to 10:00 PM at 30-40 minute headways and Sundays and holidays from 5:00 AM to 7:30 PM with approximately one hour headways.
Route 37	In service from 5:00 AM to 8:00 PM Monday through Friday with a headway of 30-40 minutes and from 8:00pm to 11:30pm with a headway of one hour. On Saturdays, service is provided at about 35-minute intervals from 5:30am to 9:00PM. On Sundays and holidays, service is provided with a headway of one hour from approximately 7:00AM to 8:00PM.
Route 43	No longer serves the City of La Habra and is replaced by Route 143 on the northern portions of the former Route 43, serving the Cities of Costa Mesa and Fullerton. Service hours include Monday through Friday from 4:00 AM to 8:00 PM with 15 minutes headways and from 8:00 PM to 1:30 AM with 20-30 minute headways. Weekends and Holiday services are from 4:00 AM to 9:00 PM with 20-30 minute headways in each direction. Then service runs on one-hour headways until 1:30 AM.
Route 47	No longer serves the City of Brea and is replaced by Route 143 on the northern portions of the old Route 47. This route does not travel along Berkeley Avenue, but instead along Commonwealth Avenue. Service is provided Monday through Friday from 4:00 AM to 11:30 PM.

Route 53	No longer serves the City of Brea, but instead Orange, and the northern portions of the old Route 53 have been replaced by Route 153. Service is provided Monday through Friday from approximately 4:00 AM to 12:00 AM.
Route 57	Service is provided approximately 4:30 AM to 1:30 AM throughout the week. Generally, service runs approximately 10 to 20-minute intervals in cities of Anaheim and Santa Ana and 30-minute intervals in cities of Fullerton, Brea, Costa Mesa and Newport Beach. Less frequent service is provided in the evening and early morning.
Route 143	Operates between La Habra and Brea, traveling mostly along Brea Boulevard and Harbor Boulevard in the city of Fullerton. Route 143 destinations include the Brea Mall, North Court, St. Jude Hospital, Fullerton College and Fullerton Transportation Center and La Habra Square. Service is provided Monday through Friday with headways of approximately 75 minutes from 3:30 AM to midnight. On weekends and holidays, service is provided with a frequency of one bus every 65 minutes from approximately 5:30 AM to 11:00 PM.
Route 147	Services have been eliminated since March 2010.
Route 153	Operates between Brea and Orange, travelling along Orangethorpe Avenue, Placentia Avenue, Yorba Linda Boulevard and Associated Road in the City of Fullerton. Service is provided Monday through Friday from approximately 4:00 AM to midnight at one-hour intervals. On weekends and holidays, service is provided with a headway of one hour from approximately 6:00 AM to 10:00 PM.
Route 721	Is an inter-county express route and a not a limited-stop route. Services are provided Monday through Friday which includes four northbound and two southbound trips in the morning between 5:00 AM and 9:30 AM and two northbound and four southbound trips in the afternoon between 3:00 PM and 7:30 PM. Route 721 is not in service on the weekends.
Route 757 & 758	No longer serve the City of Fullerton. They are express routes with no stops within the city limits.

The OCTA Bus Routes Map in Exhibit 5.4-3 is outdated. Please update the map with the following changes:

Route #	Updated Information
Route 147	Please remove bus route. It has been eliminated since March 2010.
Route 157 & 758	Please remove bus routes. They do not serve the City of Fullerton.
Route 143	Please replace the northern portions of Route 43 and 47 with Route 143
Route 153	Please replace Route 53's services in the City of Fullerton with Route 153



N. RESPONSES TO COMMENTS FROM CHARLIE LARWOOD, MANAGER, TRANSPORTATION PLANNING, ORANGE COUNTY TRANSPORTATION AGENCY, DATED APRIL 10, 2012

- N1. The comment is acknowledged.
- N2. The changes in local transit service that have occurred since the traffic analysis was prepared are acknowledged. It is also acknowledged that transit routes and schedules will continue to change periodically, based on prevailing conditions and factors.

Draft EIR pages 5.4-26 to 5.4-29 will be revised in the Final EIR, as follows:

Orange County Transportation Authority (OCTA)

OCTA operates several routes in and through the City of Fullerton. Exhibit 5.4-3, OCTA Bus Routes, illustrates the bus routes that traverse the City of Fullerton. A brief description of each of the transit lines in the City of Fullerton is provided below.

Route 20 operates between the Cities of Yorba Linda and La Habra, serving the City of Fullerton via Imperial Highway. Major destinations along Route 20 include the Richard Nixon Library, Brea Mall, and the La Habra Marketplace. Service is provided Monday through Friday with a headway (frequency of bus arrival) of ~~60~~ 100 minutes in each direction from approximately 6:00 AM to 7:30 PM. No weekend service is provided on Route 20.

Route 24 operates between the Cities of Buena Park and Orange, traveling along ~~Magnolia Avenue, Gilbert Street, Malvern Avenue, Chapman Avenue, and Nutwood Avenue~~ Commonwealth Avenue in the City of Fullerton. Service is provided Monday through Friday from approximately 5:00 AM to ~~11:00~~ 9:30 PM with a headway of approximately one hour. ~~During the morning and evening commute hours Route 24 runs on approximately 30-minute headways in each direction. During non-commute hours, the headway is approximately one hour. On weekends and holidays, service is provided at one-hour headways from approximately 7:00 AM to 9:00 PM.~~

Route 25 operates between the Buena Park Metrolink Station, the Fullerton Park 'N Ride area, and Huntington Beach, briefly serving the City of Fullerton via Magnolia Avenue and Orangethorpe Avenue. Service is provided Monday through Friday from approximately 5:00 AM to 11:00 PM. This route has a headway of approximately ~~30~~ 45 minutes ~~until approximately 6:00 PM, when it runs at one-hour frequencies.~~ On weekends and holidays service is provided with a frequency of one bus per hour in each direction from approximately 8:00 AM to 8:00 PM.

Route 26 operates between the Fullerton Park 'N Ride area and the North Orange County Community College District in Yorba Linda, serving Fullerton via Magnolia Avenue and Commonwealth Avenue. Major destinations along Route 26 include the Fullerton Transportation Center, Cal State Fullerton, and the Richard Nixon Library.



Service is provided Monday through Friday from approximately 5:00 AM to 11:00 PM. Headways on Route 26 are approximately 30 minutes from 5:00 AM to 6:00 PM, and approximately one hour from 6:00 PM to 11:00 PM. Service is limited between the Cal State Fullerton area and Yorba Linda on some trips. On weekends and holidays, service is provided approximately every half-hour from 8:00 AM to 7:00 PM.

Route 30 operates between the Los Cerritos Center and the Anaheim Hills area, serving the City of Fullerton via Orangethorpe Avenue. Service is provided Monday through Friday from approximately 4:00 AM to 11:30 PM. Bus arrival frequency is normally ~~30~~ 45 minutes, ~~until 6:00 PM, when it runs at one-hour intervals.~~ On weekends and holidays, service is provided with a headway of one hour from approximately 6:30 AM to 9:00 PM.

Route 35 operates between the Fullerton Park 'N Ride area and Pacific Coast Highway in Huntington Beach. Route 35 travels on Brookhurst Street for almost the entire route. Service is provided Monday through Friday from approximately 4:30 ~~AM~~ PM to 10:00 PM at ~~20-30-~~40 minute headways, ~~except during late evening hours, when it runs at one-hour intervals.~~ On weekends and holidays, service is provided ~~with a frequency of 30 to 40 minutes~~ from approximately 5:00 AM to ~~7:30~~ 8:00 PM with a headway of one hour.

Route 37 operates between the Cities of La Habra and Fountain Valley, traveling mostly on Euclid Street. Destinations along this route include the North Orange County Community College District, Anaheim Plaza, Garden Grove Civic Center, and Mile Square Park. Service is provided Monday through Friday with a headway of approximately ~~30-~~40 minutes from approximately 5:00 AM to ~~4:00~~ 4:30 PM and from 8:00 PM to 11:30 PM with a headway of one hour. On Saturdays, service is provided at about 35-minute intervals from 5:30 AM to 9:00 PM. On Sundays weekends and holidays, service is provided with a headway of one hour from approximately 7:00 AM to 8:00 PM. ~~at about half-hour intervals from approximately 6:00 AM to 9:00 PM.~~

Route 143 operates between the Cities of Costa Mesa and Fullerton. ~~La Habra, traveling mostly along Harbor Boulevard in the City of Fullerton.~~ Major destinations along ~~Route 43~~ include the Triangle Square shopping area, Disneyland Resort area, the Fullerton Transportation Center, Fullerton College, St. Jude Hospital and La Habra Square. Service is provided Monday through Friday with a headway of 15 minutes in each direction from approximately 4:00 AM to 8:00 PM ~~midnight~~ and from 8:00 PM to 1:30 AM with 20-30 minute headways. Night Owl service runs hourly from midnight until approximately 4:30 AM. ~~On weekends and holidays service is provided from 4:00 AM to 9:00 PM with 20-30 minute headways in each direction. Then service runs on one-hour headways until 1:30 AM.~~ approximately every 20 minutes in each direction from approximately 5:00 AM to midnight. Night Owl service runs on one hour headways between midnight and 4:30 AM.

Route 47 operates between the Cities of Brea Fullerton and Newport Beach, traveling along Lemon Street, ~~Berkeley Avenue~~ Commonwealth Avenue, and Harbor Boulevard in the City of Fullerton. Major destinations within the City of Fullerton include North Court, Fullerton Transportation Center, and Fullerton College. Service is provided Monday through Friday with headways of approximately 15-20 minutes in each direction from approximately 4:00 AM to 11:00 PM. ~~On weekends and holidays, service is provided with a frequency of one bus every 20 to 30 minutes from approximately 5:00 AM to~~



11:00 PM.

Route 53 operates between the Cities of Brea Orange and Irvine, traveling along Orangethorpe Avenue and Placentia Avenue, Yorba Linda Boulevard, and Associated Road in the City of Fullerton. Service is provided Monday through Friday from approximately 4:00 AM to 12:30 AM. Route 53 has a headway of 10-15 minutes for most of the day, except late evening hours when it runs at 30-minute intervals. On weekends and holidays, service is provided with a frequency of one bus every 15 to 20 minutes from approximately 6:00 AM to 10:00 PM.

Route 57 operates between the Cities of Brea and Newport Beach, serving the City of Fullerton along State College Boulevard. Route 57 provides service to Brea Mall, Cal State Fullerton, Angel Stadium, The Block at Orange, UCI Medical Center, Santa Ana College, the Orange County Performing Arts Center, Newport Transportation Center, and others along the route. Service is provided throughout the week Monday through Friday from approximately 4:30 AM to midnight 1:30 AM at approximately 10 to 20-minute intervals in the cities of Anaheim and Santa Ana and 30-minute intervals in the cities of Fullerton, Brea, Costa Mesa, and Newport Beach. Less frequent service is provided in the evening and early morning. Night Owl service is provided from midnight to 4:30 AM at one-hour intervals. On weekends and holidays, service is provided with a frequency of one bus every 10 to 20 minutes from approximately 5:00 AM to midnight. From midnight to 5:00 AM, Night Owl service runs every hour.

Route 147 operates between the Cities of Brea and Santa Ana, traveling mostly along Brea Boulevard, Bastanchury Road, Harbor Boulevard, Chapman Avenue, and Raymond Avenue in the City of Fullerton. Route 147 destinations include the Brea Mall, St. Jude Hospital, the Fullerton Transportation Center, the Anaheim Civic Center, Crystal Cathedral, UCI Medical Center, and Main Place Mall. The route is operated using mid-size or small buses. Service on Route 147 is limited to two northbound buses and one southbound bus in the early morning commute hours, and one northbound bus and three southbound buses in the afternoon commute hours. There is no weekend service.

Route 153 is operated between Brea and Orange, traveling along Orangethorpe Avenue, Placentia Avenue, Yorba Linda Boulevard, and Associated Road in the City of Fullerton. Service is provided Monday through Friday from approximately 4:00 AM to midnight at one-hour intervals. On weekends and holidays, service is provided with a headway of one hour from approximately 6:00 AM to 10:00 PM.

Route 213 is operated between the Brea Park 'N Ride and the University Research Center in Irvine, traveling along State College Boulevard, Brea Boulevard, Harbor Boulevard, and Chapman Avenue in the City of Fullerton. Service is provided Monday through Friday with four southbound trips in the morning commute hours and four northbound trips in the afternoon commute hours at half-hour intervals.

Route 721 is an inter-county express route ~~a limited-stop route~~ and operates between the Fullerton Park 'N Ride area and downtown Los Angeles via the 91 Freeway and 110 Freeway. Service is provided to the Los Angeles Convention Center, Staples Center, and other downtown destinations. Service is provided Monday through Friday, which includes four northbound and two southbound trips in the morning between 5:00 AM and



~~9:30 AM and two northbound and four southbound trips in the afternoon between 3:00 PM and 7:30 PM. Northbound buses depart the Fullerton Park 'N Ride every half hour from 5:00 AM to 8:30 AM Monday through Friday. Weekday afternoon northbound buses depart every hour from 2:15 PM to 5:15 PM. Weekday southbound buses run from 6:00 AM to 9:15 AM and from 3:00 PM to 6:30 PM every half hour. There is no weekend service on this route.~~

Draft EIR Exhibit 5.4-3, *OCTA Bus Routes*, will be revised in the Final EIR to reflect the current bus system serving Fullerton.

It is the City's goal to increase the availability and desirability of transit options, and to shift travel demand from the automobile to alternative travel modes, including transit. The City will continue to work with OCTA toward this end.

EDMUND G. BROWN JR.
GOVERNORMATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Santa Ana Regional Water Quality Control Board

April 11, 2012

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

**DRAFT ENVIRONMENTAL IMPACT REPORT, THE FULLERTON PLAN:
 CITY OF FULLERTON GENERAL PLAN UPDATE, NORTHWESTERN ORANGE COUNTY,
 SCH# 2011051019**

Dear Ms. Allen:

Staff of the California Regional Water Quality Control Board, Santa Ana Region (Regional Board) has reviewed the Draft Environmental Impact Report (DEIR) for "The Fullerton Plan," or the City of Fullerton (City) General Plan Update (Project). The Project discusses policies and reorganization of all 1996 General Plan elements under four main elements, toward implementing a community "Vision for Fullerton" during a 2030 planning horizon. Fullerton is surrounded by:

- On the north and west, the Cities of Brea, La Habra, La Mirada, Buena Park, and a small portion of unincorporated Orange County around the Fullerton Airport;
- On the south and east, the Cities of Anaheim, Placentia, Yorba Linda, and State Routes 91 and 57.

The City has varied topography and features within its 22.3 square miles, notably the Coyote Hills crossing its northern portion from east to west. Southwest-trending drainages either cross this hilly terrain or originate from it. In the southern, more flat portions of the City are located the Fullerton Airport (southwest), a central historic downtown district, various industries and commercial sites (south and southeast), and major educational centers (California State University, Fullerton (CSUF) and Fullerton Community College). Fullerton is a major rail and bus transportation hub for Orange County.

Where mixed use development is appropriate, the Project will consider allowable dwelling and commercial densities within two such development types (Neighborhood and Urban Center Mixed Use). The Project identifies 12 Focus Areas throughout Fullerton for mixed use redevelopment, improved circulation, or potential buildout (Executive Summary p.2-4). Our comments are mostly relevant to the Fullerton Plan's Natural Environment element, particularly Chapters 16 ("water") and 19 ("open space and natural resources"), and to the North Harbor Corridor and West Coyote Hills Focus Areas.