

Responses to Comments on Draft Initial Study/Negative Declaration

Street Lights Fullerton Project

Prepared for

City of Fullerton
Community & Economic Development Department
303 W. Commonwealth Avenue
Fullerton, California 92832
Contact: Heather Allen, AICP, Planning Manager
Heather.Allen@cityoffullerton.com

Prepared by

Psomas
5 Hutton Centre Drive, Suite 300
Santa Ana, California 92707
Contact: Alia Hokuki
(714) 751-7373

October 2021

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1.0 INTRODUCTION AND SUMMARY

1.1 INTRODUCTION

The purpose of this document is to present public comments and responses to those comments received on the Draft Initial Study/Negative Declaration (Draft IS/ND) for the Street Lights Fullerton Project. The City of Fullerton, as the Lead Agency, has evaluated all substantive comments and has prepared written responses. In accordance with the California Environmental Quality Act (CEQA) Guidelines (Title 14 California Code of Regulations [CCR] Section 15074[b]), the decision-making body of the Lead Agency must consider the IS/ND and comments received before approving the Project. This document, which will be provided to the Planning Commission and City Council, as the decision-making bodies, has been prepared in accordance with CEQA and represents the independent judgment of the Lead Agency.

The approximate 4.47-acre Project site is in the City of Fullerton, in Orange County, California. The site is located at 229 East Orangethorpe Avenue, within an existing shopping center, Fullerton Town Center (FTC—Focus Area D-Harbor Gateway in The Fullerton Plan), northwest of the intersection of South Lemon Street and East Orangethorpe Avenue. Local access to the site is provided by East Orangethorpe Avenue and South Lemon Street. Regional access is provided by State Route 91 (SR-91).

The Project is an infill development and involves construction of 329 multi-family residential units in a 5-story building (380,000 square feet [sf]); a 6-story 567-space parking garage (187,000 sf); up to 6,500 sf of retail on the ground floor; and approximately 80,400 sf of open space including internal amenities, 3 outdoor courtyards, a pool, and outdoor gathering spaces. The residential building will include studios, one-bedroom, and two-bedroom apartments. Five percent of the total units (i.e., 17 units) would be reserved for deed-restricted very-low-income households. The 6,500-sf of retail on the ground floor would include a total of six storefront along the southern façade of the building facing East Orangethorpe Avenue. The 187,000-sf parking garage will include a total of 567 parking spaces in addition to 50 surface parking spaces. The existing commercial/retail uses and associated surface parking lot within the Project site would be demolished to accommodate the proposed Project.

The proposed conceptual landscape plan would consist of a hierarchy of plant materials including trees, shrubs, hedge, grasses, and groundcover throughout the Project site, and in open space areas. A layered landscape concept (various tree sizes) along the northern, eastern, southern, and western perimeters of the residential structures would provide decorative screening and a buffer between the proposed uses and existing surface parking lots and commercial uses. Ground-mounted utilities would be screened with decorative metal screens or shrubs. A total of 115 trees are proposed to be planted. The landscape design and irrigation would take into account water efficiency measures.

Implementation of the proposed Project would include improvements on South Lemon Street at the entry to the Project site. Lemon Street is a five-lane roadway (two through lanes per direction and a two-way left turn lane) in the Project area. A traffic signal would be installed at the intersection of South Lemon Street and Liberty Avenue, providing signalized access for the Project and the Fullerton Town Center (FTC). Along with the signal, exclusive single southbound

right-turn lanes would be added at the South Lemon Street/Liberty Avenue and South Lemon Street/Project Driveway intersections. Northbound and southbound left-turn lanes would still be provided at the South Lemon Street/Liberty Avenue intersection but left-turns at the Project Driveway on South Lemon Street as well as through movements across South Lemon Street would be prohibited.

In accordance with the State CEQA Guidelines, Section 15073, the Draft IS/ND was circulated for a 20-day public review and comment period beginning on September 7, 2021 and ending on September 27, 2021. Additionally, the Draft IS/ND was available on the City of Fullerton website. During the public review period, the City received a total of five comment letters from regional and local agencies, an organization, and an individual on the Draft IS/ND. Written responses have been prepared to all comments received during the comment period and are included in Section 3.0 of this document.

The Final IS/ND consists of three documents: (1) the Draft IS/ND; (2) the Technical Appendices; and (3) the Responses to Comments document. The Responses to Comments document includes four sections: Section 1.0, provides the introduction; Section 2.0 provides a list of commenters on the Draft IS/ND; Section 3.0 provides responses to environmental comments received on the environmental document; and Section 4.0 includes the revisions to the text of the Draft IS/ND.

2.0 LIST OF COMMENTERS

The following is a list of commenters that submitted written comments on the Draft IS/ND. The comments included written and e-mail correspondence. The comments are listed chronologically within each category, as appropriate, and numbered. The responses have been prepared to match the bracketing on the comment letters. Each comment letter is followed by responses to address the comments. The comment letters and responses are included in Section 3.0 of this document.

No.	Commenter	Date of Correspondence	Page Number
<i>Local and Regional Agencies</i>			
1	Orange County Sanitation District (OCSD)	September 21, 2021	3-3
2	Orange County Water District (OCWD)	September 22, 2021	3-6
3	City of Anaheim, Planning and Building Department (AP&B)	September 28, 2021	3-10
<i>Organizations</i>			
4	Supporters Alliance for Environmental Responsibility (SAFER)	September 24, 2021	3-14
<i>Individuals</i>			
5	Jane Reifer (JR)	September 27, 2021	3-17

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3.0 RESPONSES TO COMMENTS

The City's responses to comments received on the Draft IS/ND are provided below. The responses are numbered to match the bracketing on the comment letter. Comment letters received are categorized by local and regional agencies, organizations, and individuals. Within each category, as appropriate, the responses are provided chronologically.

3.1 LOCAL AND REGIONAL AGENCIES

Three comment letters was received from the local and regional agencies. The comment letters are listed chronologically, below:

- Orange County Sanitation District (OCSD)—September 21, 2021
- Orange County Water District (OCWD)—September 22, 2021
- City of Anaheim, Planning and Building Department (AP&B)—September 28, 2021

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10844 Ellis Avenue
Fountain Valley, CA 92708
714.962.2411
www.ocsan.gov

Letter 1

September 21, 2021

Heather Allen, Planning Manager
303 West Commonwealth Avenue
Fullerton, Community Development Department
Email: Heather.Allen@cityoffullerton.com

SUBJECT: The Street Lights Fullerton Project - Notice of Intent to Adopt a Negative Declaration

Thank you for providing the Notice of Intent to Adopt a Negative Declaration proposed project "The Street Lights Fullerton Project (PRJ2020-00004) located at 215-229 East Orangethorpe Avenue and 1101 and 1111 South Lemon Street". Orange County Sanitation District (OC San) has reviewed it and would like to bring to your attention a requirement as it applies to your project.

This project is proposing to build a six-story parking structure. Please be advised that the OC San does not allow parking structure drains to be connected to the sewer. OC San realizes the connection would be made to a City of Fullerton sewer. However, City sewers eventually connect to OC San sewers, that lead to the reclamation plant in Fountain Valley. If you have any questions regarding this letter, please contact Kevin Hadden at 714 593-7462 or khadden@ocsan.gov.

Adam Nazaroff 2021.09.22
13:48:53 -07'00'

Adam Nazaroff,
Engineering Supervisor
Planning Division
714 593-7854

AN:KH:sa
[http://project/sites/Planning/CEQA/Externally Generated/2021 Comment Letters and emails/City of Fullerton NOI Adopt a Neg Dec 20210921.docx](http://project/sites/Planning/CEQA/Externally%20Generated/2021%20Comment%20Letters%20and%20emails/City%20of%20Fullerton%20NOI%20Adopt%20a%20Neg%20Dec%2020210921.docx)

cc: Jason Daniel

- Serving:
- Anaheim
- Brea
- Buena Park
- Cypress
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach

OCSD-1

- La Habra
- La Palma
- Los Alamitos
- Newport Beach

OCSD-2

- Placentia
- Santa Ana
- Seal Beach
- Stanton
- Tustin
- Villa Park
- County of Orange
- Costa Mesa Sanitary District
- Midway City Sanitary District
- Irvine Ranch Water District
- Yorba Linda Water District

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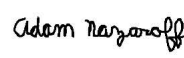
10844 Ellis Avenue
Fountain Valley, CA 92708
714.962.2411
www.ocsan.gov

September 29, 2021

Heather Allen, Planning Manager
303 West Commonwealth Avenue
Fullerton, Community Development Department
Email: Heather.Allen@cityoffullerton.com

SUBJECT: The Street Lights Fullerton Project - Notice of Intent to Adopt a Negative Declaration

In regard to the City of Fullerton Notice of Intent to Adopt a Negative Declaration and the Orange County Sanitation District's (OC San) response letter sent on September 21, 2021. This letter is to serve the purpose for clarification on the parking structure and connection to the sewer. For example, connection of a bathroom to the sewer in a parking structure is allowed by OC San. Its only parking structure floor drains that are not allowed to connect to the sewer. If you have any questions regarding this letter, please contact Kevin Hadden at 714 593-7462 or khadden@ocsan.gov

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Adam Nazaroff,
Engineering Supervisor
Planning Division
714 593-7854

KH;sa
http://project/sites/Planning/CEQA/Externally_Generated/2021_Comment_Letters_and_emails/City_of_Fullerton_NOI_Adopt_Negative_Dec_Clarification_Ltr_20210929.docx

cc: Jason Daniel

- Serving:
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 - Garden Grove
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 - La Palma
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 - Orange
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 - Santa Ana
 - Seal Beach
 - Stanton
 - Tustin
 - Villa Park
 - County of Orange
 - Costa Mesa Sanitary District
 - Midway City Sanitary District
 - Irvine Ranch Water District
 - Yorba Linda Water District

Our Mission: To protect public health and the environment by providing effective wastewater collection, treatment, and recycling.

Letter 1: Orange County Sanitation District

Comment Letter Dated September 21, 2021, clarified September 29, 2021

- OCSD-1 The comment reiterates the location of the Project and indicates that the letter identifies a requirement applicable to the Project. The comment is noted, and no further response is required.
- OCSD-2 The comment indicates that the Orange County Sanitation District has certain requirements regarding parking structure drains to be connected to the sewer. The commenter provides clarification in their subsequent letter. The comment was intended as point of information and not an identified project deficiency.

It should be noted that the proposed parking structure drains will tie to the storm sewer and not sanitary sewer. As such, the Project would not violate the Orange County Sanitation District's requirement and no further response is required.

DIRECTORS
DENIS R. BILODEAU, P.E.
CATHY GREEN
NELIDA MENDOZA
DINA L. NGUYEN, ESQ.
KELLY ROWE, C.E.G., C.H.
STEPHEN R. SHELDON
HARRY SIDHU, PE.
TRI TA
BRUCE WHITAKER
ROGER C. YOH, P.E.



ORANGE COUNTY WATER DISTRICT
COUNTY'S GROUNDWATER AUTHORITY

OFFICERS
President
STEPHEN R. SHELDON

First Vice President
CATHY GREEN

Second Vice President
IRITA

General Manager
MICHAEL R. MARKUS, P.E., D.WRE

September 22, 2021

Letter 2

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

Subject: OCWD Comments on the City of Fullerton's Initial Study of The Street Lights Fullerton Project (PRJ2020-0004)

Dear Ms. Allen,

The Orange County Water District (OCWD or District) appreciates the opportunity to comment on the City of Fullerton's Initial Study of The Street Lights Fullerton Project (PRJ2020-0004).

OCWD-1

The District supports the determination that stormwater infiltration should not occur as part of the development of the Street Lights Fullerton Project. The proposed project overlays the North Basin Groundwater Protection Plume (NBGPP). Per the National Pollutant Discharge Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) permit and associated Technical Guidance Document (TGD), "Infiltration" is prohibited within plume protection boundaries identified by Orange County Water District (OCWD)".

OCWD-2

The District would also like to take the opportunity to notify the City of Fullerton that OCWD has permanent and temporary work area easements for two monitoring wells located within the properties to be developed (Appendix 1). These wells are identified as FM-23 and FM-23A. The Street Lights Fullerton Project must consider and evaluate impacts to OCWD easements.

OCWD-3

If you have any questions, please contact Kevin O'Toole at (714) 378-8248 or kotoole@ocwd.com.

Sincerely,

Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE
General Manager

Enclosure (1): Appendix 1

PO Box 8300
Fountain Valley, CA 92728-8300

18700 Ward Street
Fountain Valley, CA 92708

(714) 378-3200
(714) 378-3373 fax

www.ocwd.com

Letter 2: Orange County Water District

Comment Letter Dated September 22, 2021

OCWD-1 The comment expresses appreciation for the opportunity to review and comment on the IS/ND for the proposed Project. The comment is noted, and no response is required.

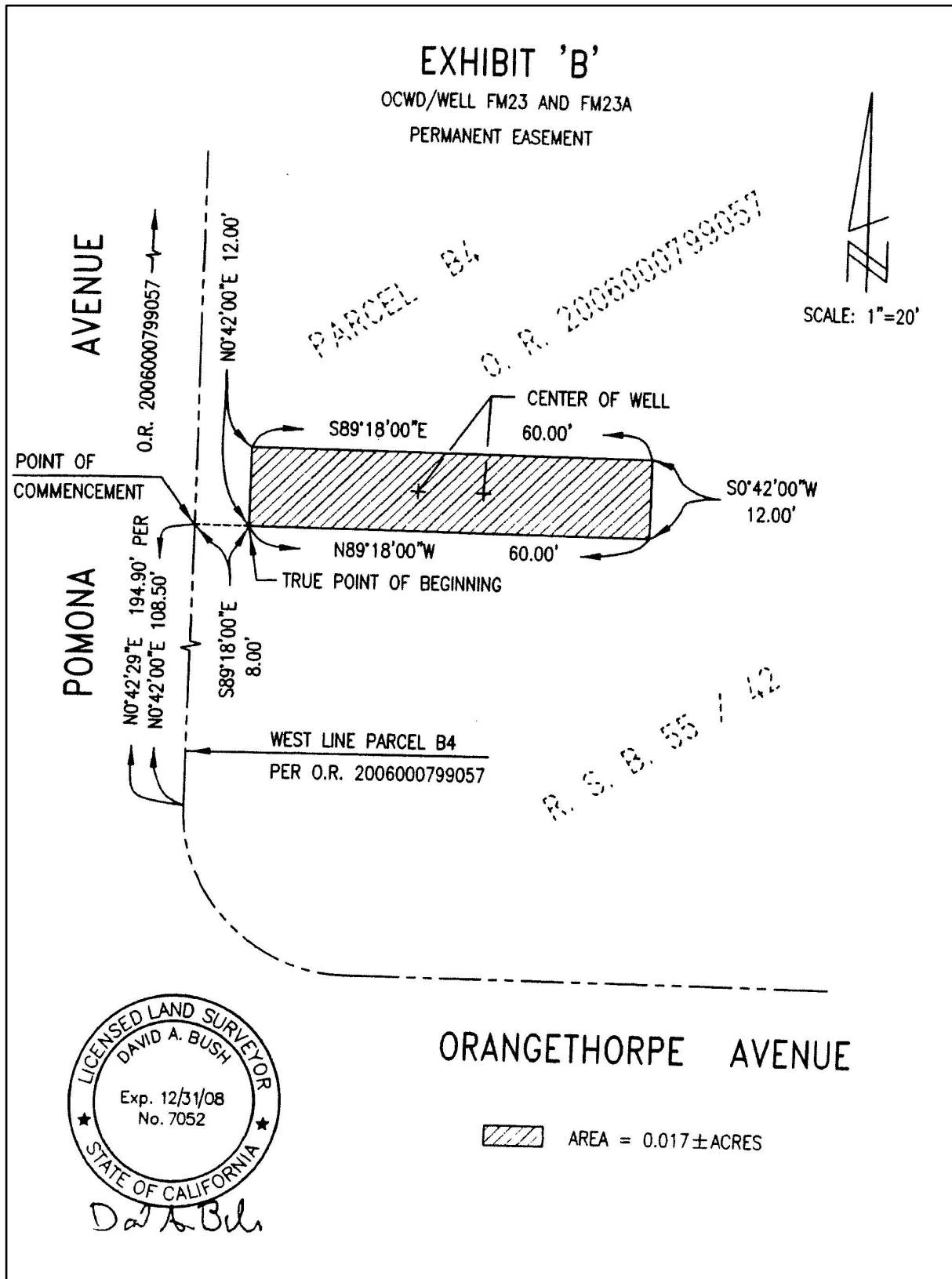
OCWD-2 The comment concurs with the finding that stormwater infiltration should not occur as part of the proposed Project because the Project overlays the North Basin Groundwater Protection Plume (NBGPP), and that according to the National Pollutant Discharge Elimination System (NPDES) Phase I MS4 permit and associated Technical Guidance Document (TGD), infiltration is not allowed within plume protection boundaries, identified by Orange County Water District (OCWD).

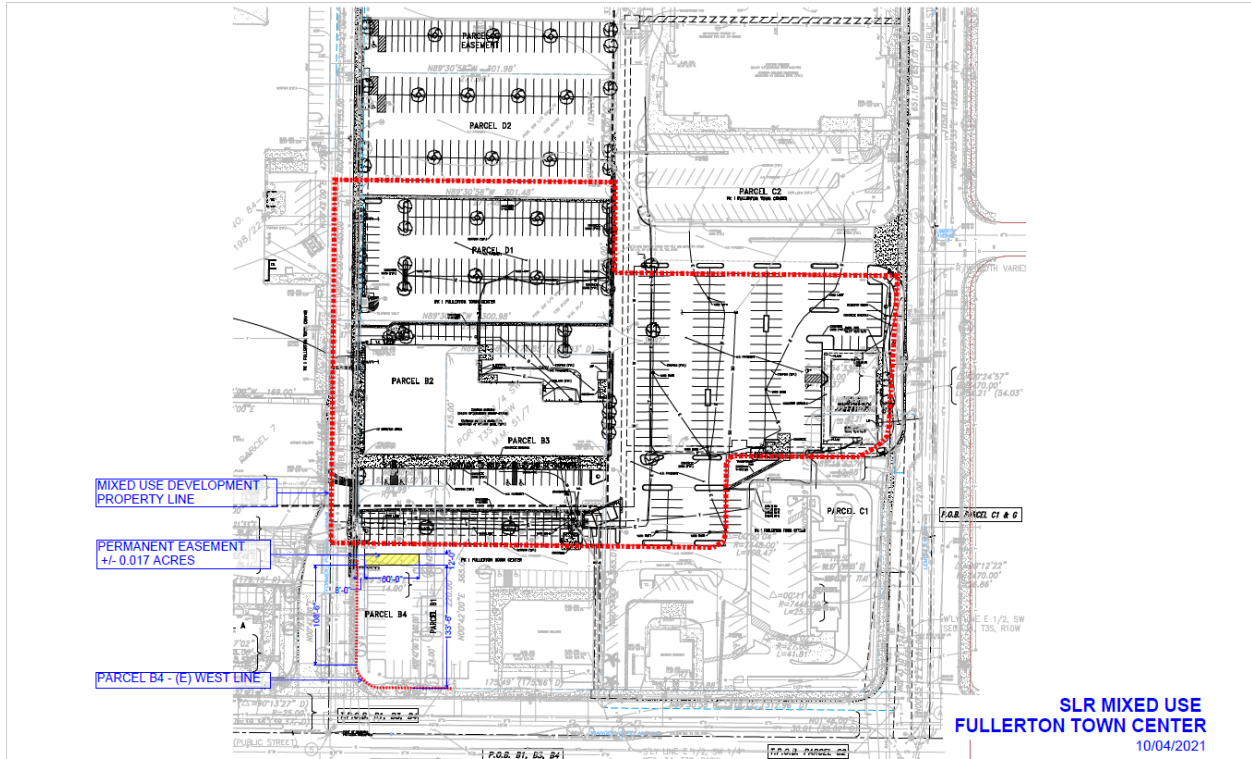
The comment is noted, and no response is required.

OCWD-3 The comment notifies the City that OCWD's permanent and temporary work area easements for two monitoring wells (FM-23 and FM-23A) may be located within the Project site, and that the potential impacts to the easements should be considered and evaluated.

Following review of the easement documents, it was confirmed that the temporary work easement for construction has terminated. With respect to the permanent easement, identified on "Exhibit B" provided below, the 12-foot easement begins 108.50 feet from the point of tangency (PT) of Orangethorpe Avenue and Pomona Avenue and ends 120.5 feet from the PT. As seen on Project Easement Exhibit, the easement completely lies south of the proposed Project.

Therefore, location of the proposed Project would not conflict with OCWD's permanent and temporary work area easements.







City of Anaheim
PLANNING AND BUILDING DEPARTMENT

Letter 3

September 28, 2021

Heather Allen
Planning Manager
Planning Services Division
303 West Commonwealth Avenue
Fullerton, CA 92832

by email to:
Heather.Allen@cityoffullerton.com

Subject: Notice of Intent to adopt a Negative Declaration for The Street Lights Fullerton Project

Dear Ms. Allen:

Thank you for the opportunity to review and comment on the above-referenced document. The City of Anaheim staff offers the following comments:

Public Works Department: Traffic Engineering Division:

AP&B-1

Please contact Vincent Tran at 714-765-5049 or VTran2@anaheim.net with questions pertaining to these comments.

Anaheim Fire & Rescue: Life Safety Section:

Please contact David Rodriguez at 714-765-4043 or DRodriguez4@anaheim.net with questions pertaining to these comments.

Initial Study Checklist Comments

Public Works Department: Traffic Engineering Division:

- Appendix K – Transportation Assessment; page 35 – Site Access Analysis: **AP&B-2**

- Any proposed modification to the existing striping on Lemon Street to implement driveway turn restrictions between Orangethorpe Avenue and Liberty Avenue needs to be coordinated with the City of Anaheim Public Works Department to avoid impacts to existing businesses on the east side of Lemon Street within the City of Anaheim.

AP&B-3

- The project proposed signalization of Liberty Avenue/Lemon Street intersection will require encroachment permits for works within the City of Anaheim right-of-way. The City of Fullerton and/or the project applicant shall be 100% responsible for operation and maintenance of the proposed traffic signal at Liberty Avenue/Lemon Street intersection.

200 S. Anaheim Blvd
Suite #276
Anaheim, CA 92805
Tel: (714) 765-5176

www.anaheim.net

City of Fullerton – The Street Lights Fullerton Project
September 27, 2021
Page 2 of 2

Anaheim Fire & Rescue: Life Safety Section:

AP&B-4

- A new traffic signal is being proposed at the intersection of Lemon Street and Liberty Ave. A signal preemptive device compatible to Anaheim Fire Department emergency vehicles shall be provided for emergency response purposes.

If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5238 or a uk@anaheim.net.

Sincerely,



Andy Uk
Associate Planner

Letter 3: City of Anaheim, Planning and Building Department

Comment Letter Dated September 28, 2021

AP&B-1 The commenter appreciates the opportunity to review the IS/ND and provide comments. The comment provides contacts at the Public Works Department: Traffic Engineering Division and Anaheim Fire & Rescue: Life Safety Section. The comment is noted. No response is required.

Initial Study Checklist Comments

Public Works Department: Traffic Engineering Division

- Appendix K – Transportation Assessment; page 35—Site Access Analysis

AP&B-2 The comment requests coordination with the City of Anaheim Public Works Department regarding the proposed modification to the existing striping on Lemon Street.

AP&B-3 The commenter notes the requirement for an encroachment permit for work within the City of Anaheim right-of-way and request that the City of Fullerton and/or the Applicant being responsible for operation and maintenance of the traffic signal at Liberty Avenue/Lemon Street.

Anaheim Fire & Rescue: Life Safety Section

AP&B-3 The comment notes the requirement for installation of a signal preemptive device compatible with the Anaheim Fire Department emergency vehicles.

The project includes conditions of approval to coordinate with the City of Anaheim with respect to the new signal at Liberty Avenue and work on Lemon Street. Specifically, the following Traffic Engineering items are included in the General Engineering Conditions for the Project.

2. A dedicated signing and striping plan, or plans, are required for Lemon Street between Orangethorpe Avenue and E. Freedom Avenue detailing all proposed traffic related work in the public right-of-way. The plans are to illustrate the widened roadway along the project frontage and how the signage and roadway striping is to be modified to provide for the new traffic signal at Liberty Avenue, the extended southbound right-turn pocket(s), driveway access modifications, and striping transitions from the full-sized lanes at Freedom Avenue to the narrower lane widths at Orangethorpe Avenue. The development of such design plans are to be coordinated with both the City Traffic Engineer and the City of Anaheim Public Works Department to ensure concurrence from both the City of Fullerton and the City of Anaheim. Such plans are to be prepared and stamped by a licensed civil or traffic engineer and, as a minimum, show full street right-of-way widths, municipal borders, all relevant above and below ground facilities,

and existing and proposed signage and striping. The signing and striping plans are to be completed to the satisfaction of the City Traffic Engineer.

3. A dedicated traffic signal design plan for the signalization of Lemon Street and Liberty Avenue is required for implementation. The traffic signal is to be designed in accordance with the City of Fullerton's design standards and practices and should include as a minimum, safety lighting, pedestrian facilities, a northbound protected-permissive left-turn arrow, video detection, and a fiber optic communications connection to the Orangethorpe Avenue and Lemon Street traffic signal. The development of the traffic signal plan is to be coordinated with both the City Traffic Engineer and the City of Anaheim to ensure concurrence on the design and operation of the traffic signal by both the City of Fullerton and the City of Anaheim. Said plan shall be prepared by a licensed civil or traffic engineer and shall be completed to the satisfaction of the City Traffic Engineer prior to issuance of a building permit.
4. The new traffic signal at the intersection of Lemon Street and Liberty Avenue is to be designed with signal pre-emption devices compatible with the City of Anaheim Fire Department engines, apparatus, and equipment.
5. The applicant is to provide a traffic signal timing plan for the new traffic signal at Lemon Street and Orangethorpe Avenue for review and approval by the City Traffic Engineer. The traffic signal timing plan is to comply will all CAMUTCD operational and safety standards and provide coordination parameters to provide synchronization between adjacent traffic signals to the extent practicable.
6. The applicant is to obtain required encroachment permits from the City of Anaheim as is required to implement the signing, striping, traffic signal, and traffic control work occurring within the City of Anaheim.
7. The applicant is to prepare a written request, on behalf of the City of Fullerton, to the City of Anaheim requesting that the City of Anaheim contribute $\frac{1}{4}$ the cost of operations and maintenance of the new Lemon Street and Liberty Avenue traffic signal. The request is to outline estimated annual operations and maintenance costs as well as the benefits to the businesses of the City of Anaheim. The request is to be reviewed/edited by the City Traffic Engineer and approved by the City Engineer before submittal to the City of Anaheim. The written request is to be initially submitted to the City Traffic Engineer within 90 days of the completion and operation of the new traffic signal.

3.2 ORGANIZATIONS

One comment letter was received from an organization. The comment letter is listed below:

- Supporters Alliance for Environmental Responsibility (SAFER)—September 24, 2021

Letter 4



T 510.836.4200
F 510.836.4205

1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email

September 24, 2021

Heather Allen, Planning Manager
Community and Economic Development
City of Fullerton
303 W. Commonwealth Ave.
Fullerton, CA 92832
heather.allen@cityoffullerton.com

Re: Comment on Negative Declaration, Street Lights Fullerton Project (PRJ2020-00004)

Dear Ms. Allen:

I am writing on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Initial Study and Negative Declaration (“IS/ND”) prepared for the Street Lights Fullerton Project (PRJ2020-00004), including all actions related or referring to the proposed construction of a 380,000 square foot, 5-story building wrapping a 6-story parking structure, with 329 residential units and up to 6,500 square feet of retail, located at 215-229 East Orangethorpe Avenue and 1101 and 1111 South Lemon Street in the City of Fullerton (“Project”).

LD-1

After reviewing the IS/ND, we conclude the IS/ND fails as an informational document, and that there is a fair argument that the Project may have adverse environmental impacts. Therefore, we request that the City of Fullerton (“City”) prepare an environmental impact report (“EIR”) for the Project pursuant to the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000, et seq.

LD-2

We reserve the right to supplement these comments, including but not limited to at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

LD-3

Sincerely,

A handwritten signature in blue ink, appearing to read 'Richard Drury', is written over a light blue horizontal line.

Richard Drury

Letter 4: Supporters Alliance for Environmental Responsibility

Comment Letter Dated September 24, 2021

- SAFER-1 The comment reiterates the Project description and location. No response is required.
- SAFER-2 The comment states that the IS/ND is not an “informational” document and that there is a fair argument that the proposed Project may have adverse environmental impacts. The comment requests that an environmental impact report (EIR) be prepared. However, the commenter does not identify any specific issues nor does it provide any substantiation for the allegation. As such, no further response is warranted.
- SAFER-3 The comment states that they reserve the right to supplement the comments, including but not limited to at public hearings. The comment is noted, and no response is required.

3.3 INDIVIDUALS

One comment (email) was received from an individual/member of the community. The comment email is listed below:

- Jane Reifer (JF)—September 27, 2021

Letter 5

Heather Allen

From: Jane Reifer [<mailto:cluttercontrol@earthlink.net>]
Sent: Monday, September 27, 2021 4:58 PM
To: Heather Allen <heather.allen@cityoffullerton.com>
Subject: [EXTERNAL MAIL] StreetLights IS / ND Public Comments

Dear Ms. Allen,

Thank you for the opportunity to respond to the StreetLights IS / ND. It's great to see a project with density in an appropriate area, and to see applicant-suggested affordable housing (but I feel there is a huge opportunity here to have more). Also, it's great to see higher than normal documentation on bus, bike and ped issues, although, unfortunately, I'm afraid there are some substantial incorrect assumptions, as I'll outline towards the end, so please expect the more weighty comments there. I will appreciate it very much if you would respond to and/or include the critical points below in your project assessment.

JR-1

Bus Stop Benches, Shelters, Maintenance

It seems appropriate that development projects would note the location and condition of nearby bus stops. Could this be done for this project and all others (I've been asking for years)? Large-project applicants should be encouraged to supply appropriate benches, shelters and other amenities, and even assume stop maintenance when appropriate. See City's P5.14 Fair Share of Improvements—Support policies and regulations which require new development to pay a fair share of needed transportation improvements based on a project's impacts to the multi-modal transportation network.

JR-2

Bike Transportation

Could we see an analysis of the impacts on current bicyclists and the proposed future bikeways of the widening of Lemon, the new signal, the northbound left turn arrow for vehicular traffic, and the eliminated turn movements from Lemon? Some of these impacts, of course, are positive, but they should be analyzed in the transportation assessments and brought before the Active Transportation Committee (ATC). Also, p. 104 of the pdf shows both bike parking for 61 spaces and for 70. Applicants can also contribute to the proposed bikeway improvements with P5.14, as above.

JR-3

External Driveways

An analysis and best safety practices are crucial for understanding impacts to bicyclists, pedestrians, transit users, and individuals with disabilities and this was not done. Please provide (It was hard to understand the construction drawing 3-11 and any changes to Orangethorpe entrance).

JR-4

Internal FTC Traffic

An analysis and best safety practices are crucial for understanding impacts to bicyclists, pedestrians, transit users, and individuals with disabilities to access FTC from Lemon and Orangethorpe are crucial for understanding impacts, this was not done. What paths will these populations use? In addition, "The Project has been designed with a pedestrian walkway system around the building, which connects to the public sidewalk on South Lemon Street as well as to the larger FTC complex." Sounds good, but could the concept for perimeter sidewalks be shown? Again, Active Transportation Committee should review this.

JR-5

<p>TPM The project anticipates possible construction-related impacts and suggests a TPM: "Implementation of traffic control measures during construction activities would minimize obstruction of vehicular traffic on public roadways in the vicinity of the Project site." The ND states "None of the bus stops or routes would be affected by the Project." But this is not true during construction especially if lanes are closed. Please ensure that the TPM also clearly includes notifications for and mitigations for impacts to bicyclists, pedestrians, transit users, people with disabilities, OCTA, and Amtrak Thruway coaches. Historically, this has not happened, other than sometimes to OCTA, and it should be addressed.</p>	<p>JR-6</p>
<p>Deed Restrictions Five percent of the total units (i.e., 17 units out of 239 + 6,500 sf of retail) reserved for deed-restricted very-low-income households. Please clarify the length of the deed restrictions.</p>	<p>JR-7</p>
<p>Development Agreement Is there one for this project? What is the threshold for one?</p>	<p>JR-8</p>
<p>Shared Parking Has the traffic for the 67 AMC spaces been included in the Transportation Assessment?</p>	<p>JR-9</p>
<p>Parking For comparison purposes, how many total parking spaces would be required without the density bonus?</p>	<p>JR-10</p>
<p>GHG In years 2 and 3, GHG emissions exceed the SCAG recommended threshold of 3,000. This is only "eliminated" if construction emissions are amortized over 30 years. This bookkeeping elimination does not address the real excess GHG in those years. The document states, "construction activities.....contribute a relatively small portion of the overall lifetime Project GHG emissions" and then discloses the difficulty in addressing the issue in the years they occur, "GHG emission reduction measures for construction equipment are relatively limited." This does not mean that they should be ignored.</p>	<p>JR-11</p>
<p>Tribal and Cultural Does the General Plan contain Standard Conditions of Approval COA TCR-1?</p>	<p>JR-12</p>
<p>Paleontology May I ask the reason that the City works with the LA Natural History Museum and not also the Cooper Center, located in Orange County?</p>	<p>JR-13</p>
<p>Wastewater The ND states both: Project uses would generate 73,710 GPD of wastewater (Woodard and Curran 2021). P. 171 and "As estimated above, the proposed Project would generate approximately 41,375 GPD of wastewater. P. 175 Are both somehow true, and what is the threshold for impact?</p>	<p>JR-14</p>
<p>Transit Priority Area (TPA) Several places in the document refer to project being located in a Transit Priority Area. It is not. It is not within one-half mile of a major transit stop.</p>	<p>JR-15</p>

When saying “Other than the OCTA Depot at the Fullerton Transportation Center, this area is the most heavily utilized location for transit boarding and includes stops which have been identified on OCTA’s list of the 100 busiest bus stops,” it’s misleading to imply that being close to a busy stop is the same as being within one-half mile of a major transit stop. These areas are governed by the definition of a Major Transit Stop, not by an OCTA document created to fund safety and amenities at bus stops. The list is not even an appropriate ranking of busy transit stops, as the list prominently states in 2 places that it does not include stops already funded and /or improved. By the way, even though it is not a major transit stop, the fact that the stop is on the list means that the City of Fullerton has not applied for the funding available to improve it.

JR-16

All concessions, statements and assessments relying on being located in a TPA are inaccurate, implying that there are, in fact, potential environmental impacts that require further analysis, with at least the level of an MND.

These may include traffic impact thresholds, FAR deviations, VMT assessment, etc.

FAR

The project asks for a zone amendment and then an additional deviation to over double the allowed FAR and states that this is a transit-station proximate project, which it is not.

JR-17

Please also clarify the “one development concession” and its application for the parking relief, FAR and others.

Potential Circular Reasoning

Could you clarify:

“The proposed project would be consistent with the permitted uses of the C-3 zone according to the Fullerton Municipal Code and the corresponding development standards, including the single development concession afforded the Project for the provision of qualifying units of affordable housing. In light of the above, the Project would not cause a significant environmental impact, as the Project would not conflict with any land use plan, policy, or regulation, including the Fullerton Municipal Code. Impacts would be less than significant, and no mitigation is required.” P. 125 of IS/ND pdf

JR-18

Traffic and VMT

VMT also relies on the statement that the project is in a TPA which it is not. “Because the Project is located in a Transit Priority Area and is expected to result in a net reduction of daily trips to and from the site as is outlined in the traffic assessment prepared for this Project, it was also determined that it is also likely that the implementation of the Project would result in a net reduction in VMT.” p. 164

The VMT Assessment says the “Project is exempt from CEQA, therefore a VMT analysis is not required”. This project is not exempt from CEQA. I’m assuming this was meant casually regarding the VMT analysis, but would like to know.

JR-19

The VMT Assessment shows the service population as 842 but it appears to be 951 and possibly also the 67 AMC shared parking spaces.

The VMT primary screening seems incorrect. The project is neither in a TPA nor does it generate less than 836 VMT. I don’t see a checkbox for changing this based on the net. I’d like to see more on this. The

VMT Assessment asks if the project generates fewer than 836 VMT and answers NO. Then it adds in an unconventional comment "Yes by net VMT."

JR-19

While the proposed Project claims fewer daily, morning, and evening peak hour trips than under the existing land uses, the Project is anticipated to generate 103 additional AM peak hour trips and 48 trips in PM peak. Were the existing trips based on observation or the standard estimates?

May I ask which body approves the ND?

It's very true that laypeople don't understand all the intricacies of Zoning, Planning, and CEQA, but it's disheartening to see project analyses and entitlements based on substantial misconceptions. Please have the analyses for this project re-submitted with more accurate premises.

JR-20

Thank you for all the work you do for Fullerton, and for reviewing and considering my comments,

Jane Reifer

Letter 5: Jane Reifer

Comment Letter Dated September 27, 2021

- JR-1 The commenter appreciates the Project and its components overall and requests that the points listed in her letter be included in the assessment of Project. The comment is noted, but no further response is needed as no specific issues are identified.
- JR-2 **Bus Stop Benches, Shelters, Maintenance.** The comment states that the location and conditions of bus stops need to be discussed for all projects, including the proposed Project, and references the City's Fair Share of Improvements. The comment is noted and will be forwarded to the decision makers. No further response is required, as the comment is general and does not identify any specific impacts. However, it should be indicated that the discussion of the conditions of bus stops for all projects is above and beyond the scope of this IS/ND and is not relevant to the proposed Project.
- JR-3 **Bike Transportation.** The comment requests analysis of potential impacts on bicyclists and future bikeways in light of widening of Lemon Street and recommends the Applicant contribute to the bikeway improvements in reference to City's Fair Share Improvements. The comment additionally identifies an inconsistency in bicycle storage of 70 versus 61 spaces.

As noted, Lemon Street does not currently include a designated bike route, but the Project recognizes the proposed Class III Bike Route on Lemon Street and proposed Class II Bike Lane on Orangethorpe Avenue. The future plan for Class III bike route on Lemon Street does not include separate right-of-way for bicyclists; however, the addition of a signal at Lemon Street and Liberty Avenue, as part of the proposed Project, would improve accessibility for both bicyclists and pedestrians. Also, eliminating left-turn movements from Lemon Street would reduce potential conflicts. As indicated in the Transportation Assessment, the Project would not include any other changes to the roadway network and would not preclude proposed improvements to the network such as those detailed in the City's Bicycle Master Plan. As such, no significant impacts have been identified on bicyclists and bike lanes, as none currently exists in the vicinity of the site.

Presenting the analysis to the Active Transportation Committee (ATC) is noted and will be forwarded to the decision maker. This is not a CEQA issue, and as such no further response is warranted.

Regarding the inconsistency in number of bicycle storage spaces, the text in Table 4-14, The Fullerton Plan Climate Action Plan GHG Reduction Measures, on page 54 in Section 4.8, Greenhouse Gas Emissions, of the IS/ND is hereby revised to read as follows (*red italics* shows the additional text and ~~red strikethrough~~ show the deletions):

MEASURE	PROJECT SUPPORT
Transportation and Mobility Strategy	
T-3: Bicycle Transportation Plan Support projects, programs, and policies to maintain and update as necessary a Bicycle Transportation Plan prepared and approved pursuant to the California Streets and Highways Code to maintain eligibility for funding for State Bicycle Transportation Account funds.	There is no existing bikeway in Fullerton proximate to the Project site. There is a proposed Class II Bike Lane on Orangethorpe Avenue to the south of the site and a proposed Class III Bike Route on Lemon Street, east of the site. The Project would not preclude the future development of these bike lanes and routes. The Project Applicant would provide 70 61 secure bicycle storage spaces for future residents and visitors at the Project site.
T-4: Bicycle Use on All Streets Support projects, programs, policies and regulations to recognize that every street in Fullerton is a street that a bicyclist can use.	The Project would not preclude the future development of the City's proposed bicycle lanes, discussed above. The Project Applicant would provide 70 61 secure bicycle storage spaces for future residents and visitors at the Project site.

Additionally, the text in Table 4-15, Proposed Project General Plan Consistency Analysis, in Section 4.11, Land Use and Planning, of the IS/ND is hereby revised to read as follows (*red italics* shows the additional text and ~~red-strikethrough~~ show the deletions):

General Plan Goal	Consistency Analysis
The Fullerton Built Environment—Bicycle	
Goal 6 A bicycle-friendly city where bicycling is a safe and convenient alternative to motorized transportation and a recreational opportunity for people of all ages and abilities.	Consistent. There is a proposed Class II Bike Lane on Orangethorpe Avenue to the south of the site and a proposed Class III Bike Route on Lemon Street, east of the site. The Project would not preclude the future development of the City's proposed bicycle lanes, discussed above. The Project Applicant would provide 70 61 secure bicycle storage spaces for future residents and visitors at the Project site.

JR-4 **External Driveways.** The commenter asserts that the analysis lacks a discussion of safety in light of potential impacts to bicyclists, pedestrians, transit users, and individuals with disabilities. It should be noted that Section 4.17, Transportation, of the IS/ND includes a detailed discussion of Mobility and Bicycle Elements of The Fullerton Plan in addition to a discussion of Active Transportation and Public Transit Analysis. The section also includes analysis of hazards due to a geometric design feature or incompatible uses. The analysis indicates that the Project would include construction of access and traffic flow improvements along South Lemon Street north of East Orangethorpe Avenue and that a traffic signal would be installed at the intersection of South Lemon Street and Liberty Avenue, as discussed above, providing signalized access for the Project as well as the existing shopping center. The traffic signal would be equipped with safety lighting, crosswalks, and pedestrian facilities. Design of the new turn lanes was completed per local and national standards, and the full signal design would follow the same guidelines. The new signal would improve access for bicyclists and pedestrians. Transit would not be affected, nor would circulation on any public facilities. The analysis adequately addresses potential impacts associated with safety. For additional discussion, please refer to Response JR-3, above.

- JR-5 **Internal FTC Traffic.** The comment is similar to comment JR-3, and as such, please refer to Response JR-3, above. Additionally, the comment references the discussion of the proposed pedestrian walkway system connecting to the public sidewalk on South Lemon Street and the larger FTC complex and asks that this system be shown. The commenter further asks that the ATC review the concept. The comment is noted and will be forwarded to the decision makers. The review by ATC is above and beyond the scope of this IS/ND and not a CEQA issue, and as such no further response is warranted.
- JR-6 **TPM.** The comment refers to “TPM”; there is no mention of “TPM” in the IS/ND. Based on the context of the comment, it is assumed that the comment is meant to reference the Traffic Control Plan, preparation of which is proposed for construction activities. The comment requests that the said plan include mitigation for impacts to bicyclists, pedestrians, transit users, people with disabilities, OCTA, and Amtrak thruway coaches. The comment is noted; however, the analysis in Section 4.17, Transportation, of the IS/ND, adequately discusses and addresses any potential impacts pertaining to construction activities.

While construction activities of the Project itself would be contained within the site, the construction of improvements on South Lemon Street may require some traffic control and other restrictions. Construction activities associated with the Project could temporarily impact street traffic adjacent to the Project site during the construction phase. This could reduce the number of lanes or temporarily close certain street segments during a typical day-to-day situation. Any such impacts would be limited to the construction period and would affect only adjacent streets or intersections . . . the Traffic Control Plan would be prepared for implementation during the construction phase and would ensure that at least one unobstructed lane shall be maintained in both directions and that temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls be implemented, if needed. The lane closures would be temporary and would not block all travel lanes. Additionally, as required by SC TRA-1, the City Community Development Department would consult with the Fullerton Police Department to disclose temporary closures and alternative travel routes, if required by construction of the Project. Therefore, construction impacts would be less than significant.

In light of the above, no construction impacts would occur to bicyclists, pedestrians, transit users, people with disabilities, OCTA, and Amtrak thruway coaches during construction activities that would require additional mitigation.

- JR-7 **Deed Restriction.** The comment questions the length of deed restriction on very low income units proposed as part of the Project. The comment is noted and will be forwarded to the decision makers; however, it is above and beyond the scope of the IS/ND and is not a CEQA issue. No further response is warranted. As a point of information, however, Government Code 65915 which governs the provision of density bonuses and other incentives, establishes a minimum length of 55 years.
- JR-8 **Development Agreement.** The commenter asks if a Development Agreement has been prepared for the Project and inquires about the threshold for preparation of a

Development Agreement. The comment is noted and will be forwarded to the decision makers. The Development Agreement is not a CEQA issue, and as such no response is required.

- JR-9 **Shared Parking.** The commenter asks if the traffic analysis included the traffic associated with the 67 AMC spaces. The Transportation Assessment provided an analysis for the proposed Project, including the parking structure at full capacity. However, it should be noted that a parking structure and surface parking spaces do not generate traffic on their own; the associated land uses determine how much traffic is generated. Existing traffic from existing on-site uses within the Fullerton Town Center, including the movie theater, was included in the traffic volumes, which were used to analyze the various on- and off-site driveways. Additionally, the AMC spaces were provided in the garage as replacement spaces for surface parking removed by the Project.
- JR-10 **Parking.** The commenter asks the number of parking spaces required without the density bonus. The comment is noted and will be forwarded to the decision makers. Parking is not a CEQA issue, and as such no response is required. As a point of information, however, the R-5 development standards require 726 spaces for the residential units. The project provides 522 resident/guest spaces, exceeding the density bonus rate of 402 stalls.
- JR-11 **GHG.** The commenter states that the GHG emissions for construction “exceed the SCAG-recommended threshold of 3,000” in years 2 and 3 of construction. It should be noted that the commenter erroneously refers to a “SCAG”-recommended threshold. As detailed on page 4-50 in Section 4.8, Greenhouse Gas Emissions, of the IS/ND, the GHG analysis uses the South Coast Air Quality Management District’s (SCAQMD’s) Tier 3 recommended threshold of 3,000 metric tons of carbon dioxide equivalent per year (MTCO_{2e}/yr). The commenter also erroneously states that the GHG emissions exceed the 3,000 MTCO_{2e}/yr for Years 2 and 3 of construction. As detailed in Table 4-11, Estimated Greenhouse Gas Emissions from Construction, on page 4-51, Years 2 and 3 emissions would be 629 MTCO_{2e} and 683 MTCO_{2e}, respectively, and all construction emissions would be less than the 3,000 MTCO_{2e}/yr threshold prior to amortization. Per the SCAQMD, and as detailed on page 4-51 of the IS/ND,

“The SCAQMD recommends that construction emissions be amortized over a 30 year project lifetime so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008). Therefore, construction and operational emissions are combined by amortizing the construction and operations over an assumed 30 year Project lifetime.”

As such, the amortized construction emissions for the Project would be 49 MTCO_{2e}/yr, and the annual GHG emissions for the Project, including operational GHG emissions, would be 2,860 MTCO_{2e}/yr, as presented in Table 4-13 of the IS/ND (page 4-52). Therefore, the emissions would be less than the SCAQMD-recommended threshold of 3,000 MTCO_{2e}/yr, and the Project would not generate GHG emissions that may have a significant impact on the environment. As the emissions were below the SCAQMD-recommended threshold, mitigation measures were not required to reduce GHG emissions to less than significant. In addition, the IS/ND evaluates consistency with

regulatory programs designed to reduce GHG emissions and contribute to the achievement of the goals of Assembly Bill (AB) 32 and Senate Bill (SB) 32 as the primary significance criterion. Specifically, a consistency evaluation in Table 4-14 (pages 4-54 through 4-57 of the IS/ND) details the Project's consistency with the Fullerton Climate Action Plan (CAP). As stated on page 4-57, since the Project is consistent with the policies and goals of The Fullerton Plan and the City's CAP, which in turn, were adopted in compliance with AB 32 and included in the growth projections used in the SCAG's RTP/SCS, the Project would not conflict with the GHG reduction goals of these regulations and plans.

- JR-12 **Tribal and Cultural.** The commenter questions if the "General Plan" includes Standard Condition of Approval COA TCR-1. It should be noted that the Condition of Approval (COA) TCR-1 is a regulatory requirement per Section 7050.5 of the *California Health and Safety Code*. As such it is and should be included in the analysis of Cultural Resources. This measure is equivalent to measure CR-4 in the Final Program Environmental Impact Report (EIR) for The Fullerton Plan (City's General Plan).
- JR-13 **Paleontology.** The comment questions why the City works with the Los Angeles Natural History Museum and not the Cooper Center in Orange County. The comment is noted. While the Cooper Center has been primarily used for projects within Orange County, the Center temporarily stopped operations and accepting collections, due to staffing. In light of this, all work was referred to the Los Angeles Natural History Museum. Cooper Center has very recently resumed operations, and future work will be conducted in coordination with the Center.
- JR-14 **Wastewater.** The comment identifies an internal inconsistency in the amount of wastewater generated by the proposed Project. The comment is noted.

The inconsistency (i.e., 73,710 versus 41,375 GPD on pages 4-120 and 4-122, respectively—and not pages 171 and 175 [PDF pages]) is acknowledged. The 73,710 GPD from the Technical Memorandum on Sewer Capacity Assessment, prepared by Woodard and Curran is correct.

In light of the above, the incorrect amount of 41,375 GPD under threshold (c) in Section 4.19, Utilities, of the IS/ND is hereby revised to read as follows (*red italics* shows the additional text and ~~red strikethrough~~ show the deletions):

Less than Significant Impact. As estimated above, the proposed Project would generate approximately ~~41,375~~ *73,710* GPD of wastewater. As stated above, through OC San, Plant No. 1 has a total rated primary capacity of 108 MGD and a secondary treatment capacity of 80 MGD.

Regarding the threshold for impact, according to the Technical Memorandum on Sewer Capacity Assessment, "The 'trigger' criterion for capacity deficiencies, which identifies when an existing sewer has insufficient capacity and requires capacity relief, was defined to occur when pipe surcharge exceeds two feet over the pipe crown or if the hydraulic grade line reaches within five feet of ground surface." Based on the results, the model predicts that the increase in flows from the proposed Project would not trigger any capacity deficiencies.

JR-15 **Transit Priority Area (TPA).** The commenter claims that the Project is not located within a Transit Priority Area (TPA) or within one-half mile of a major transit stop and thus further analysis is required. The commenter provides a series of statements without any supporting justification as to the claim that the Project is not located within a TPA. The comment is noted and will be forwarded to the decision makers. Although no response is warranted in the absence of any justification or documentation of the commenter's assertions, the City's determination that the Project is located within a TPA is consistent with the Office of Planning and Research (OPR) Guidance. Additionally, the City's Transportation Assessment Policies and Procedures (TAPP) outlines the process, methodology, and evaluation criteria for Vehicle Miles Traveled (VMT) assessments under CEQA. Based on the TAPP assessment for the project it was determined by the City Traffic Engineer that the Project is located within a TPA and will result in 222 fewer daily trips to/from the site than the existing uses on the site and thus it is reasonable to conclude that the Project will have no probable VMT impact.

JR-16 **FAR.** The comment argues against increasing the FAR and asks for clarification regarding "one development concession" and its application for the parking relief, FAR and others.

The Project is eligible for development concession(s) and separate parking reductions because it provides affordable housing pursuant to 15.17.120 (as amended by Government Code 65915).

JR-17 **Potential Circular Reasoning.** The comment questions the conclusion regarding land use impacts when the project has a development concession .

Please see Response JR-16, above. While the Project is deviating from 0.90 FAR of C-3 zone with the proposed 1.96 FAR, in light of the development concession as provided pursuant to 15.17.120 (as amended by Government Code 65915), there is no impact pertaining to inconsistency with the Fullerton Municipal Code. Furthermore, the Project furthers the objectives of The Fullerton Plan with respect to the Harbor Gateway Focus Area and facilitating housing production.

JR-18 **Traffic and VMT.** The commenter questions the validity of the VMT analysis and conclusions and states that the Project is not within a TPA. Please refer to Response JR-15, above, which provides the VMT screening process and why the Project would not result in an impact pertaining to VMT. Additionally, the City's target VMT per service population threshold is 29.6. Analysis of the Project without a VMT credit results in a 17 percent lower VMT generation rate than The Fullerton Plan Buildout rate of 29.6. As a result, no further VMT study or analysis is required for the City or for the purposes of CEQA.

The commenter questions the Project's service population. The service population for purposes of the VMT analysis is 842. The number of onsite parking spaces is not an assessment variable in the determination of VMT service population.

The commenter asked if the existing site trips used in the LOS screening process were based on observations or standard estimates. The existing site trips were based on ITE Trip Generation Manual, 10th Edition as required by the adopted TAPP.

JR-19 The comment asks about the approving body for the ND and states that the analyses for the proposed Project be re-submitted. The comment is noted.

The City of Fullerton City Council has the authority for making a decision on the proposed Project and associated discretionary actions, including the IS/ND.

Regarding the analyses, the IS/ND has been prepared in accordance with CEQA and the State CEQA Guidelines, Sections 15070 and 17051. The IS/ND has fully and adequately analyzed the potential impacts of the proposed Project in the context of all topical issues. The IS/ND and the supporting technical reports were reviewed by the City and approved before the IS/ND was circulated for the 20-day public review. As such, revisions to and recirculation of the IS/ND is not warranted.

4.0 REVISIONS AS PART OF THE FINAL IS/ND

Revisions have been made to the Draft IS/ND based on input received during the public review period and while preparing the responses to comments on the Draft IS/ND. The revisions requested by the commenters do not reflect a substantial change to the Project description, nor would any of the changes result in a new impact or intensification of an impact already identified in the Draft IS/ND. The changes are not in response to comments that raise significant environmental issues. Additions to the Draft IS/ND are shown in *red italicized* text and deletions are shown in ~~red strikethrough~~ text.

4.1 REVISIONS TO THE TEXT OF THE IS/ND

4.1.1 SECTION 4.8 GREENHOUSE GAS EMISSIONS

To address the inconsistency in number of bicycle storage spaces, the text in Table 4-14, The Fullerton Plan Climate Action Plan GHG Reduction Measures, on page 54 in Section 4.8, Greenhouse Gas Emissions, of the IS/ND is hereby revised to read as follows (*red italics* shows the additional text and ~~red strikethrough~~ show the deletions):

MEASURE	PROJECT SUPPORT
<i>Transportation and Mobility Strategy</i>	
T-3: Bicycle Transportation Plan Support projects, programs, and policies to maintain and update as necessary a Bicycle Transportation Plan prepared and approved pursuant to the California Streets and Highways Code to maintain eligibility for funding for State Bicycle Transportation Account funds.	There is no existing bikeway in Fullerton proximate to the Project site. There is a proposed Class II Bike Lane on Orangethorpe Avenue to the south of the site and a proposed Class III Bike Route on Lemon Street, east of the site. The Project would not preclude the future development of these bike lanes and routes. The Project Applicant would provide 70 <i>61</i> secure bicycle storage spaces for future residents and visitors at the Project site.
T-4: Bicycle Use on All Streets Support projects, programs, policies and regulations to recognize that every street in Fullerton is a street that a bicyclist can use.	The Project would not preclude the future development of the City's proposed bicycle lanes, discussed above. The Project Applicant would provide 70 <i>61</i> secure bicycle storage spaces for future residents and visitors at the Project site.

4.1.2 SECTION 4.11 LAND USE AND PLANNING

To address the inconsistency in number of bicycle storage spaces, the text in Table 4-15, Proposed Project General Plan Consistency Analysis, in Section 4.11, Land Use and Planning, of the IS/ND is hereby revised to read as follows (*red italics* shows the additional text and ~~red strikethrough~~ show the deletions):

General Plan Goal		Consistency Analysis
The Fullerton Built Environment—Bicycle		
Goal 6	A bicycle-friendly city where bicycling is a safe and convenient alternative to motorized transportation and a recreational opportunity for people of all ages and abilities.	Consistent. There is a proposed Class II Bike Lane on Orangethorpe Avenue to the south of the site and a proposed Class III Bike Route on Lemon Street, east of the site. The Project would not preclude the future development of the City’s proposed bicycle lanes, discussed above. The Project Applicant would provide 70 61 secure bicycle storage spaces for future residents and visitors at the Project site.

4.1.3 SECTION 4.19, UTILITIES

To address the inconsistency in number of bicycle storage spaces, the incorrect wastewater amount of 41,375 GPD under threshold c) in Section 4.19, Utilities, of the IS/ND is hereby revised to read as follows (*red italics* shows the additional text and ~~red-strikethrough~~ show the deletions):

Less than Significant Impact. As estimated above, the proposed Project would generate approximately ~~41,375~~ *73,710* GPD of wastewater. As stated above, through OC San, Plant No. 1 has a total rated primary capacity of 108 MGD and a secondary treatment capacity of 80 MGD.