

3. Response to Comments

This section of the Final Environmental Impact Report (FEIR; Final EIR) for the Enderle Center Rezone Project (Project) includes a copy of all comment letters that were submitted during the public review period for the Draft Environmental Impact Report (DEIR), along with responses to comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. The 45-day review period for the DEIR began on June 7, 2024, and ended on July 22, 2024. A total of three comment letters were received in response to the DEIR during the 45-day public review period, and one comment letter was received after the close of the public review period.

The responses amplify or clarify information provided in the DEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the Project unrelated to its environmental impacts) are noted for the record. Where text changes in the DEIR are warranted based on comments received, updated Project information, or other information provided by City staff, those changes are noted in the response to comment and the reader is directed to Chapter 2.0, *Errata*, of this FEIR.

These changes to the analysis contained in the DEIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines Section 15088.5, recirculation of the DEIR is not required.

All written comments received on the DEIR are listed in Table 3-1. All comment letters received on the DEIR have been coded with a number to facilitate identification and tracking. The comment letters were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. To aid readers and commenters, electronically bracketed comment letters have been reproduced in this document with the corresponding responses provided immediately following each comment letter.

Table 3-1: Comments Received on the DEIR

Comment Letter	Commenter	Date
1	Orange County Sanitation District	June 27, 2024
2	California Department of Transportation, District 12	July 18, 2024
3	Orange County Transportation Authority (OCTA)	July 22, 2024
4	City of Irvine	July 25, 2024

To finalize the EIR for the Project, the following responses were prepared to address these comments.

Comment Letter 1: Orange County Sanitation District (OC San), dated June 27, 2024



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

June 27, 2024

Samantha Beier, Senior Planner
City of Tustin
Community Development Department
300 Centennial Way, Tustin, CA 92780

SUBJECT: Enderle Center Rezone Project – Notice of Preparation of a Draft Environmental Impact Report

Thank you for providing the Notice of Availability (NOA) of a Draft Environmental Impact Report for the Enderle Center Rezone Project. The project site is bound on the north by 17th Street; on the east by Enderle Center Drive and the eastern property line of properties fronting Enderle Center Drive; to the south by Vandenberg Lane; and to the west by the 55 Freeway, including properties west of Yorba Street.

The City of Tustin is proposing a Zone Code Amendment to create a Housing Overlay district to the Project site. Based on the desired purpose of the rezoning, there may be some sewer issues. Developers should coordinate with the Orange County Sanitation District (OC San) if/when any sewer improvements are proposed for future project build outs in the project area. Also, prior to approval of construction permits under Mitigation Measure UT-2, include submittal of a sewer capacity analysis of existing wastewater utility in the area for OC San review and obtain sewer capacity verification from OC San.

If you have any questions regarding this letter, please contact Kevin Hadden, Principal Staff Analyst, Planning Division, at (714) 593-7462 or khadden@ocsan.gov.

Brown, Andrew 

Andrew Brown
Engineering Supervisor
Planning Division
714 593-7052

AB:KH:op
https://ocsd.gov.sharepoint.com/sites/Planning/CEQA_Externally_Generated/2024_Comment_Letters/City_of_Tustin_Response_Ltr_20240626.docx

- Serving:
- Anaheim
- Brea
- Buena Park
- Cypress
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- Irvine
- La Habra
- La Palma
- Los Alamitos
- Newport Beach
- Orange
- 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

1.1
1.2
1.3

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



Response to Comment Letter 1: Orange County Sanitation District (OC San), dated June 27, 2024

Response to Comment 1.1: This comment provides a summary of the Project location. This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Response to Comment 1.2: This comment summarizes that the Project proposes a Zone Code Amendment to create a Housing Overlay and states that the rezoning may lead to sewer issues. The comment states future developers should coordinate with OC San at the time sewer improvements are proposed and requests that Mitigation Measure UT-2 be revised to include coordination with OC San. The mitigation measure has been revised to include coordination and approval by OC San as shown below and included in Chapter 2.0, *Errata*.

Section 5.11 Utilities and Service Systems, page 5.11-16

MM UT-2 Future proposed Projects shall prepare capacity analyses of existing sewer utilities in the area to ensure conveyance and pressure is adequate for future projects proposed. The developer shall then identify infrastructure improvements necessary for the proposed development. The developer will be responsible for preparing a capacity analysis in coordination with the EOCWD and the City. **The developer shall then submit the sewer capacity analysis to the Orange County Sanitation District (OC San) for review and verification that there is available sewer capacity.** The capacity analysis and infrastructure improvements shall be reviewed and approved by EOCWD, **OC San**, and the City prior to approval of the construction permit.

Response to Comment 1.3: This comment provides contact information for who to reach out to with any questions about the comment letter. The comment is conclusionary in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other specific CEQA issue. As substantiated by the responses above, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. No revisions per this comment are required and no further response is required or provided.

Comment Letter 2: California Department of Transportation (Caltrans), dated July 18, 2024

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation



DISTRICT 12
1750 East 4th Street, Suite 100 | SANTA ANA, CA 92705
(657) 328-6000 | FAX (657) 328-6522 TTY 711
<https://dot.ca.gov/caltrans-near-me/district-12>

July 18, 2024

Samantha Beier
City of Tustin
300 Centennial Way
Tustin, CA 92780
Dear Ms. Beier,

File: LDR/CEQA
SCH#2024020747
LDR LOG #202202499
SR-55

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report for the Enderle Rezone project. The City of Tustin is proposing a General Plan Amendment (GPA) and zone change for the application of a Housing Overlay (HO) district over an existing commercial development known as the Enderle Center. Pursuant to Housing Element Program 1.1f, the city is proposing an overlay zone ("overlay district") for the Project site to add 413 housing units. The anticipated development does not rely on the demolition of any existing buildings, but rather focuses on areas currently used for surface parking. Additionally, the Project anticipates the additional development of 118,467 square feet of nonresidential uses in the future, for a total nonresidential development capacity of 205,603 square feet on the Project site, pursuant to the General Plan. A specific development project is not proposed as part of this Rezoning Project. The Project involves approval of the proposed Housing Overlay, a General Plan Amendment, Zoning Code Amendment, and a Zone Change. The Project site is generally bounded on the north by 17th Street; on the east by Enderle Center Drive and the eastern property line of properties fronting Enderle Center Drive; to the south by Vandenberg Lane; and to the west by the 55 Freeway, including properties west of Yorba Street.

2.1

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Caltrans is a responsible agency on this project and has the following comments:

1. The proposed project increases the capacity of allowable housing units and will function as a mixed-use site. Mixed-use development offers an opportunity to encourage multi-modal travel and reduce VMT. Short local car trips can potentially be replaced with walking and bicycling trips.
2. Consider complete street designs on streets surrounding the project area. There are opportunities for connections to other modes of transportation near the

2.2

2.3

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Ms. Samantha Beier
July 18, 2024
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project. These include the Santa Ana Metrolink Station, OCTA Bus Route 60, and a Class II bike lane east of Prospect Avenue. | 2.3 cont.

3. Caltrans encourages the design of Complete Streets that include high-quality pedestrian and bicycle facilities that are safe and comfortable for users of all ages and abilities. Consider enhancing bike and pedestrian infrastructure on 17th Street. | 2.4

4. During construction, please ensure that appropriate detours and safety measures are in place that prioritize the mobility, access, and safety of bicyclists, pedestrians, and transit users. If adjacent sidewalks or bike lanes need to be closed during construction, please ensure that closures and detours are clearly signed. See OCTA's bikeways map for the regional landscape of complete streets <https://www.octa.net/pdf/ocbikewaysmap.pdf> | 2.5

5. There is a missing crosswalk at the southeast corner of the Project site on Enderle Center Drive and Vandenberg Lane. Adding a crosswalk here would support pedestrian accessibility between the housing community south of Vandenberg Lane to businesses at future housing at the project site. | 2.6

6. Consider midblock crosswalks with safety features on Yorba Street and Enderle Center Drive to connect future housing development on east and west side of the project site to the businesses at Enderle Center. This will enhance walkability and accessibility and provide convenient access between the residential areas and local businesses. | 2.7

Please consider the following recommendations from Caltrans March 18, 2024, letter:

7. Ensure that truck parking, ingress and egress, and staging will not interfere with vehicle parking, pedestrian paths, or bicycle lanes/bicycle parking. | 2.8

8. Establish freight pick up & drop off times that do not coincide with peak commute hours to reduce passenger vehicle conflicts and congestion for freight. Consider designating on-street freight-only parking and delivery time windows so trucks will not resort to double parking, thus causing street traffic congestion. | 2.9

9. For the multifamily residential units proposed, consider how many individual packages will be delivered daily to individual residences. Amazon lockers or an | 2.10

"Provide a safe and reliable transportation network that serves all people and respects the environment"

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equivalent shared drop-off location can help reduce the amount of driving done by delivery trucks and can increase the efficiency of deliveries. | 2.10 cont.

10. Work with local partners and community representatives to mitigate any truck traffic routing onto residential streets or conflicting with other road users, including and especially bicyclists and pedestrians. | 2.11

11. In the event of any work performed within Caltrans right-of-way, an encroachment permit will be required prior to construction. Please submit all applications and associated documents/plans via online web portal base Caltrans Encroachment Permit System (CEPS) at <https://ceps.dot.ca.gov/> | 2.12

12. Any work performed within Caltrans right of way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. Prior to submitting to Caltrans Permit's branch, applicant should fill out Applicant's Checklist to Determine Applicable Review Process (QMAP List) Form TR-0416 to determine if project oversight/coordination with Caltrans Project Manager is needed. Applicant must submit a signed Standard Encroachment Permit application form TR-0100 along with a deposit payable to Caltrans. Deposit amount will be dependent on when the application is submitted. Public corporations are legally exempt from encroachment permit fees. Please note that all utility work should be disclosed prior to permit submittal, and utility companies are to apply for separate permits for their corresponding work. | 2.13

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Maryam Molavi, at Maryam.Molavi@dot.ca.gov. | 2.14

Sincerely,



Scott Shelley
Branch Chief – Local Development Review/Climate Change/Transit
District 12

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Response to Comment Letter 2: California Department of Transportation (Caltrans), dated July 18, 2024

Response to Comment 2.1: This comment summarizes project understanding and provides an introduction to the comment letter. This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Response to Comment 2.2: The comment acknowledges that the Project would facilitate mixed use development, which has the potential to reduce VMT and encourage multi-modal travel. This comment has been noted for the record. This comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Response to Comment 2.3: The commenter recommends consideration of complete street design surrounding the Project site. Additionally, the commenter suggests connections to other modes of transportation near the Project site, including Santa Ana Metrolink Station, OCTA Bus Route 60, and the Class II bike lane east of Prospect Avenue.

As noted by the commenter in their summary of Project understanding, the Project being considered includes a General Plan Amendment (GPA) and implementation of a Housing Overlay (HO) to accommodate potential future development of 413 dwelling units in consistency with the City's approved Housing Element. No actual development is proposed as part of this project. All future development projects would be required to undergo plan check review with the City and project-specific traffic studies would be required as determined appropriate by the City's traffic guidelines.

The Project site is currently developed and there are no bike lanes on the public roadway network currently serving the Project site. The closest existing bike lane to the Project site is a Class II Bike Lane east of Prospect Avenue along 17th Street. According to Figure C-5, *Master Bikeway Plan*, of the City's General Plan, a Class II bike lane is planned along Prospect Avenue, approximately 1,000 feet west of the Project site. However, this bike lane has not been implemented. Sidewalks currently exist on both sides of 17th Street, Vandenburg Lane, and Yorba Street and on the northbound side of Enderle Center Drive. Future projects would be required to analyze, and incorporate as feasible, access to alternative modes of transportation and collaborate with applicable regional, state, and federal parties during the development process (see General Plan Circulation Element Policies 1.3, 1.10, 1.11, 6.2, and 6.14). Therefore, future projects would be evaluated with a project-specific study and plan check, which would ensure the project is consistent with the City's policies to consider and implement access to alternative modes of transportation and no further response is required or provided.

Response to Comment 2.4: The commenter encourages the design of Complete Streets that include high quality pedestrian and bicycle facilities. Specifically, the commenter suggests enhancing bike and pedestrian infrastructure on 17th Street. As discussed above in Response to Comment 2.3, future projects would be evaluated with a project-specific traffic study and plan check as applicable, which would ensure the project is consistent with the City's policies to consider and implement access to alternative modes of transportation. As future residential projects are proposed, the City will continue to identify potential roadway, bicycle, and pedestrian improvements that could enhance connectivity to surrounding facilities and uses.

Response to Comment 2.5: The commenter indicates that during construction, the City should ensure that appropriate detour and safety measures are in place that prioritize the mobility, access, and safety of bicyclists, pedestrians, and transit users. Any closures should be clearly signposted.

Per the City's *Standard Plans and Design Standards*, all traffic control, temporary signage and striping, barricading, and detouring shall be as depicted on the traffic control plan submitted and approved by the City, and per the requirements of the California Manual on Uniform Traffic Control Devices (CA MUTCD). All layouts shall be reviewed by the City's project inspector for conformance with the approved plan. The Project

does not propose any development; however, all future projects would be required to follow City guidelines for detours, signage, and other traffic control activities.

Response to Comment 2.6: The commenter notes that there is a missing crosswalk at the southeast corner of the Project site on Enderle Center Drive and Vandenberg Lane. The comment further suggests that adding a crosswalk would support connectivity between the Project site and residential community south of Vandenberg Lane.

No development is currently proposed as part of the Project. As discussed above in Response to Comment 2.3, future projects would be evaluated with a project-specific traffic study and plan check as applicable. As future projects are proposed, the City will identify potential roadway, bicycle, and pedestrian improvements that could enhance connectivity to surrounding facilities and uses.

Response to Comment 2.7: The commenter requests that the City consider midblock crosswalks with safety features on Yorba Street and Enderle Center Drive to provide connectivity between the Project site and commercial uses to the east and west.

No development is currently proposed as part of the Project. As discussed above in Response to Comment 2.3, future projects would be evaluated with a project-specific traffic study and plan check as applicable. As future projects are proposed, the City will identify potential roadway, bicycle, and pedestrian improvements that could enhance connectivity to surrounding facilities and uses.

Response to Comment 2.8: The commenter recommends that the City ensure proposed truck parking, circulation, and construction staging would not interfere with vehicle, bicycle, or pedestrian circulation and parking.

The transportation analysis within the DEIR was prepared pursuant to SB 743, which requires that VMT thresholds be utilized for traffic analysis, and State CEQA Guidelines Section 15064.3 that states that a project's effect on automobile delay shall not constitute a significant environmental impact. As such, the Project TIA is not considered part of the DEIR or supporting CEQA documentation since it is an analysis of automobile delay and level of service issues. Further, the comments and questions provided by the commenter do not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. However, the City will coordinate with Caltrans to address their concerns regarding the TIA and will continue to communicate with Caltrans as future development is proposed.

As noted by the commenter in their summary of Project understanding, the Project being considered includes a General Plan Amendment (GPA) and implementation of a Housing Overlay (HO) to accommodate potential future development of 413 dwelling units in consistency with the City's approved Housing Element. No actual development is proposed as part of this project. All future development projects would be required to undergo plan check review with the City and project-specific traffic studies would be required as determined appropriate by the City's traffic guidelines.

Further, while the Draft EIR analysis considers future buildout of the remaining 118,474 SF of maximum nonresidential use currently allocated to the Project site by the City's General Plan, the Project does not propose an increase in allowed nonresidential uses, nor does the Project propose development of any nonresidential projects at this time. Future residential construction could require a temporary increase in truck traffic and staging; however, each project would be required to prepare a project-specific Stormwater Pollution Prevention Plan (SWPPP) in compliance with the Construction General Permit (CGP), which would include proposed construction staging areas and would be reviewed and approved by a City Engineer. Additionally, any required detour for pedestrian or bicycle paths would be outlined in a traffic control plan prepared pursuant to the City's *Standard Plans and Design Standards*. Therefore, the Project would not result in direct increase in truck traffic or staging. Future indirect truck traffic and staging would be coordinated

on a project-by-project basis in the future. This comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Response to Comment 2.9: The commenter recommends that the City coordinate freight pickup and drop off times around peak commute times to reduce freight and vehicle conflicts. The commenter also suggests that the City consider designated on-street freight-only parking and delivery windows to avoid truck double parking and traffic congestion.

As discussed above in Response to Comment 2.8, the Project would allow for future development of up to 413 dwelling units within the Project site. The Project does not propose development, therefore at this time it is too speculative to determine specific level of service patterns. All future development projects would be required to undergo plan check review with the City and project-specific traffic studies would be required as determined appropriate by the City's traffic guidelines.

Further, as discussed in Response to Comment 2.8, circulation and level of service are analyzed in the Project TIA, which is not part of the EIR. However, the City will continue to coordinate with Caltrans regarding their TIA comments and address any other level of service-related concerns. Therefore, this comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. No further response is required or provided.

Response to Comment 2.10: The commenter recommends the City determine how many individual packages will be delivered daily to individual residences and consider the implementation of Amazon lockers or drop-off locations to reduce the amount of delivery driving needed.

As discussed above in Response to Comment 2.9, the Project does not propose development and future projects are too speculative to determine specific level of service patterns at this time. Project-specific traffic studies would be prepared as necessary for all future development pursuant to the requirements of the City traffic guidelines.

Further, as discussed in Response to Comment 2.8, circulation and level of service are analyzed in the Project TIA, which is not part of the EIR. However, the City will continue to coordinate with Caltrans regarding their TIA comments and address any other level of service-related concerns. Therefore, this comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. No further response is required or provided.

Response to Comment 2.11: The commenter recommends the City coordinate with local partners and community representatives to mitigate truck traffic on residential streets or other conflicts with road users, including bicyclists and pedestrians.

As discussed above in Response to Comment 2.9, the Project does not propose development, therefore at this time it is too speculative to determine specific level of service patterns. Project-specific traffic studies would be prepared as necessary for all future development pursuant to the requirements of the City traffic guidelines.

Further, as discussed in Response to Comment 2.8, circulation and level of service are analyzed in the Project TIA, which is not part of the EIR. However, the City will continue to coordinate with Caltrans regarding their TIA comments and address any other level of service-related concerns. Additionally, as discussed under Draft EIR Section 5.4, *Land Use*, future projects would be required to analyze, and incorporate as feasible, access to alternative modes of transportation and collaborate with applicable regional, state, and federal parties during the development process (see General Plan Circulation Element Policies 1.3, 1.10, 1.11, 6.2, and 6.14). Therefore, the Project would not result in conflict with road users and no further response is required or provided.

Response to Comment 2.12: The commenter notifies the City that any work performed within Caltrans right-of-way would require an encroachment permit prior to construction. The commenter provides the link to the Caltrans Encroachment Permit System.

As discussed above in Response to Comment 2.9, the Project does not propose development, therefore at this time it is too speculative to determine specific level of service patterns. Future development projects would follow the appropriate Caltrans encroachment permit process as necessary. This comment has been noted for the record and no further response is required or provided.

Response to Comment 2.13: This comment states that any work performed within Caltrans right of way would require discretionary review and approval by Caltrans to obtain an encroachment permit prior to construction. The commenter notes that prior to initiating the encroachment permit process, the applicant should fill out the Applicant's Checklist to Determine Applicable Review Process (QMAP List) Form TR-0416 to determine if project oversight/coordination with Caltrans Project Manager is needed. The commenter provides additional encroachment permit application instructions.

As discussed above in Response to Comment 2.9, the Project does not propose development, therefore at this time it is too speculative to determine specific level of service patterns. Future development projects would follow the appropriate Caltrans encroachment permit process as necessary. This comment has been noted for the record and no further response is required or provided.

Response to Comment 2.14: The commenter requests that the City continues to coordination with Caltrans for any future developments that could potentially impact State transportation facilities and provides a contact. This comment is conclusory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment Letter 3: Orange County Transportation Authority (OCTA), dated July 22, 2024



July 22, 2024

AFFILIATED AGENCIES

- Orange County Transit District
- Local Transportation Authority
- Service Authority for Freeway Emergencies
- Consolidated Transportation Service Agency
- Congestion Management Agency

Ms. Samantha Beier
 Senior Planner
 Community Development Department
 300 Centennial Way
 Tustin, CA 92780

Via email: HousingElementRezone@tustinca.org

Subject: Notice of Availability of a Draft Environmental Impact Report for the Enderle Center Rezone Project

Dear Ms. Beier:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review the Notice of Availability of a Draft Environmental Impact Report (EIR) for the Enderle Center Rezone Project. OCTA has the following comments for your consideration:

3.1

- In the Draft EIR on page 4-9, in Section 4.5.9 Transportation, Existing Transit Service:
 - Please include Routes 59, 64, 70, 72, 79, 90, 167, 472, and 473, these routes serve the City of Tustin (City).
 - Please remove Routes 61, 65, 75, and 463, these routes do not serve the City.
- In Appendix D VMT Analysis on page 9, Figure 2, please include the sections of McFadden Avenue and Walnut Avenue as being served by Route 66, as shown in Attachment A. The short version of Route 66 serving the City has peak weekday frequencies of 15 minutes.

3.2

3.3

We encourage open communication with OCTA on any matters discussed herein. Should you have any comments or questions, please contact me at (714) 560-5907 or at dphu@octa.net.

3.4

Sincerely,

Dan Phu
 Manager, Environmental Programs

DP:tc

Attachment: Attachment A - Tustin HQTC Map

Orange County Transportation Authority
 550 South Main Street / P.O. Box 14184 / Orange / California 92663-1584 / (714) 560-OCTA (6282)

Response to Comment Letter 3: Orange County Transportation Authority (OCTA), dated July 22, 2024

Response to Comment 3.1: This comment provides an introduction to the comment letter. This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Response to Comment 3.2: This comment states that DEIR Section 5.9, *Transportation*, specifically Section 5.9.3.2, *Existing Transit Service* (DEIR page 5.9-6), erroneously included OCTA bus routes 61, 65, 75, and 463 as routes that serve the City. Additionally, the comment states that the section left out bus routes 59, 64, 70, 72, 79, 90, 167, 472, and 473, which do serve the City. The discussion has been revised to remove the bus routes that do not serve the City and include the bus routes that do serve the City, as shown below and included in Chapter 2.0, *Errata*.

Section 5.9 Transportation, page 5.9-6

Public transit bus service for the City is provided by the Orange County Transportation Authority (OCTA). The established network includes Routes 59, 60, 61, 64, 65, 66, 70, 71, 72, 75, 79, 90, 167, 472, and ~~463~~ 473. The Project is not located within a Transit Priority Area (TPA); however, adjacent to the Project at the junction of 17th Street and Enderle Center Drive, there are two existing public transit bus stations served by Route 60 with bus service every 30 minutes. These stations are situated on both the northern side of 17th Street and Yorba Street and on the southern side of 17th Street and Enderle Center Drive. The major routes of travel for Route 60 include Larwin Square to Long Beach via Newport and Seventeenth. Route 60 operates on approximately 30-minute headways on weekdays and weekends and connects to the Newport Transportation Center.

Response to Comment 3.3: This comment states that the Vehicle Miles Traveled (VMT) Analysis, included as Appendix D to the DEIR, references an outdated figure illustrating the High Quality Transit Corridors (HQTC) in the City of Tustin. The comment states that sections of McFadden Avenue and Walnut Avenue are served by Route 66 and the figure included in the VMT Analysis needs to be updated to reflect this.

The VMT Analysis was prepared using the City of Tustin Vehicle Miles Traveled Analysis Guidelines, dated March 2024. While the City appreciates that OCTA identifies sections of McFadden Avenue and Walnut Avenue as a HQTC, the City's adopted guidelines are based on the Southern California Association of Government's (SCAG) definition and determination of HQTCs in the area. SCAG defines a HQTC as being within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The City's adopted VMT Guidelines were in effect at the time of the DEIR's preparation, and revisions to the Guidelines are not a part of the proposed Project; therefore, the City does not intend to revise the approved VMT Guidelines at this time. Regardless, City staff will continue to coordinate with OCTA on policy matters. This comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Response to Comment 3.4: This comment provides contact information for who to reach out to with any questions about the comment letter. The comment is conclusionary in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other specific CEQA issue. As substantiated by the responses above, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. No revisions per this comment are required and no further response is required or provided.

Comment Letter 4: City of Irvine, dated July 25, 2024



Community Development

cityofirvine.org

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575 949-724-6000

July 25, 2024

Samantha Beier
Senior Planner
City of Tustin
300 Centennial Way
Tustin, CA 92780

Email: HousingElementRezone@tustinca.org

Subject: Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) in Compliance with Title 14 Section 15087(a) of the California Code of Regulations for the Enderle Center Rezone Project

Samantha Beier:

The City of Irvine is in receipt of the NOA of a Draft EIR for the Enderle Center Rezone Project in the City of Tustin. Pursuant to Housing Element Project 1.1f, the City of Tustin is proposing an overlay zone for the project. To accomplish this, the City of Tustin is requesting a GPA to establish a higher density residential uses within the PCCB land use designation when prescribed by a Housing Overlay or Specific Plan. The Enderle Center has the capacity of up to 413 housing units consistent with Tustin's Housing Element.

4.1

Staff has reviewed the project and has no comments. If you have any questions, please contact Senior Planner Justin Equina at jequina@cityofirvine.org or at 949-724-6364.

Thank you for the opportunity to review the project.

Sincerely,

Justin Equina
Senior Planner

Response to Comment Letter 4: City of Irvine, dated July 25, 2024

Response to Comment 4.1: This comment provides a brief summary of the Project description and states that the City of Irvine has reviewed the Project and has no comments. This comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided. This comment is noted for the record.