



March 2, 2026

City of Fullerton
Community & Economic Development Department
Attn: David Lopez, Senior Planner
303 W. Commonwealth Avenue
Fullerton, California 92832
Via email: David.Lopez@cityoffullerton.com

SUBJECT: Proposal to Prepare Environmental Documentation for the 1712 to 1730 West Orangethorpe Avenue and 1330 South Brookhurst Road Mixed-Use Development Project (RFP 2026-01)

Dear Mr. Lopez,

De Novo Planning Group (De Novo) is pleased to submit this proposal to prepare environmental documentation pursuant to the California Environmental Quality Act (CEQA) for the 1712 to 1730 West Orangethorpe Avenue and 1330 South Brookhurst Road Mixed-Use Development Project pursuant to RFP 2026-01.

Our Team, led by Starla Barker, AICP, Project Manager, is comprised of professionals with expertise in preparing technical studies and environmental analysis for CEQA compliance projects. Located in the Tustin office, Starla will serve as the Project Manager and be the primary day-to-day contact for the City. Starla has over 20 years of experience preparing and managing environmental compliance documents, specializing in infill development and redevelopment projects within urbanized areas, including preparation of the CEQA clearance documentation for the 1901 Via Burton Industrial Project, 1500 S. Raymond Avenue Industrial Project, and the 1340 Acacia Avenue (Rosary Academy) Project in Fullerton.

We appreciate the opportunity to provide a proposal to prepare CEQA services for the 1712 to 1730 West Orangethorpe Avenue and 1330 South Brookhurst Road Mixed-Use Development Project and have adequate capacity to begin the work program immediately. Our proposal has been prepared pursuant to RFP 2026-01. We welcome the opportunity to discuss the work program in greater detail. Please do not hesitate to contact Starla Barker at (949) 396-8193 or at sbarker@denovoplanning.com if you have any questions or would like additional information. As a Principal and co-owner of the firm, Steve McMurtry is authorized to make legally binding commitments on behalf of De Novo Planning Group.

Sincerely,

DE NOVO PLANNING GROUP
Steve McMurtry, Principal

DE NOVO PLANNING GROUP
Starla Barker, AICP, Principal Planner

SECTION A

It is our understanding that the Project site is currently zoned General-Commercial (G-C) and is developed with the following existing uses:

- 1712 W. Orangethorpe Avenue: Taqueria El Ranch Mexican Restaurant with supporting surface parking area;
- 1718 W. Orangethorpe Avenue: Shuttered and fenced former dental office with supporting surface parking area;
- 1730 W. Orangethorpe Avenue: Chevron gas station with a mini mart (proposed to remain and be remodeled); and
- 1330 S. Brookhurst Road: Shuttered and fenced former restaurant space with supporting surface parking area.

The Applicant is requesting a Major Site Plan, Lot Merger, Zone Change from G-C to C-3 Commercial Business District and a General Plan Amendment from Commercial to Urban Center Mixed Use to allow for development of a four story mixed-use development with 95 apartment units of which 10 percent would be low-income units; the existing gas station would be remodeled.

Based upon the information provided in Request for Proposal 2026-01 and our experience with preparation of CEQA documentation for the City of Fullerton and specifically for mixed-use infill developments, we anticipate preparation of the following technical analyses/studies:

TASK 2 PREPARATION OF TECHNICAL STUDIES

The City's traffic engineer will prepare a TAPP (Transportation Assessment Policies and Procedures) analysis to determine if the Project meets the criteria for a VMT analysis and/or LOS study. Since it is unknown at this time if these studies will be required, optional tasks have been provided below.

De Novo will prepare the Air Quality Greenhouse Gas Emissions, Energy, and Noise Analyses that will be incorporated into the CEQA document but are not intended to be a standalone report. Preparation of a Health Risk Assessment is included as an optional task. A Cultural Resources Report will also be prepared by South Environmental. Peer review of the City's VMT analysis and optional preparation of an LOS study or peer review or an LOS study, if warranted, will be prepared. Additional technical studies/analyses beyond those that have been identified below are not anticipated. These technical studies will be prepared to support the findings/analysis (Section B).

AIR QUALITY AND GREENHOUSE GAS EMISSIONS STUDY

De Novo will utilize our in-house Environmental Scientists to prepare an Air Quality and Greenhouse Gas Emissions analysis for this Project. The analysis will be incorporated into the CEQA document and is not anticipated to be a stand-alone study. The Project site is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Development of the Project will result in short-term construction-related emissions and long-term operational emissions. De Novo will conduct an analysis of potential air quality and greenhouse gas (GHG) emissions based on assessment methodologies developed by the SCAQMD and accepted industry standards. A quantitative analysis of regional and localized air quality impacts attributable to the Project will be prepared. The localized impact analysis will be conducted based on the SCAQMD's Localized Significance Threshold. The analysis will assess whether local sensitive land uses, including the Orangethorpe Elementary School, would be exposed to excessive levels of criteria and toxic air contaminants. This impact analysis will provide discussions related to assessment

methodology, SCAQMD thresholds of significance, a consistency analysis with air quality attainment plans and the Fullerton Plan, cumulative impact analysis, and a discussion of any mitigation measures needed to reduce significant impacts on air quality. Air quality and greenhouse gas sections of the environmental document will be prepared.

The Project will involve construction activities that would occur adjacent to the Orangethorpe Elementary School. Due to the proximity of diesel vehicles used construction of the Project, students and teachers would be exposed to diesel exhaust which may result in chronic and cancer related health impacts. Though a human health risk assessment (HRA) is not always requested by the SCAQMD or the City, the cost for preparation of a HRA is included as an optional item. If there are significant health risk impacts, mitigation measures would be evaluated to minimize the potential for health risk impacts related to Project construction activities.

CULTURAL RESOURCES

The De Novo team includes South Environmental to prepare the cultural resources report and support with tribal cultural consultation.

CHRIS Records Search. South Environmental will request a California Historical Resources Information Systems (CHRIS) records search of the project site and a 0.5-mile radius from the South Central Coastal Information Center (SCCIC), which houses records for Orange County. The purpose of a records search is to identify any previously recorded cultural resources; review historical maps of the project site; review the Archaeological Resources Directory list; and gather information on ethnographies. In addition, South Environmental will review the lists for the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and the lists of California State Historical Landmarks, and California Points of Historical Interest.

Sacred Lands File Search. South Environmental will contact the California Native American Heritage Commission (NAHC) for a review of their Sacred Lands File. The NAHC will determine if any NAHC-listed Native American sacred lands are located within or adjacent to the project site. In addition, the NAHC will provide a list of Native American contacts for the project who should be contacted for additional information. South Environmental will not prepare letters to the NAHC-listed contacts as part of this task to avoid confusion or redundancy with tribal outreach efforts supporting the City.

Cultural Resources Survey. A South Environmental cultural resources specialist will conduct a pedestrian survey of the project site, spot checking any areas with ground surface visibility. We assume the cultural resources survey will be negative for archaeological and tribal cultural resources and that no more than three (3) historic built environment resources will require recording. No artifacts, samples, or specimens will be collected during the survey. Should any additional resources be identified as a result of the records search or survey requiring recordation or collecting, we will work with you to augment this scope of work and associated costs.

Property Evaluations. South Environmental will complete historic significance evaluations for no more than three (3) properties over 45 years old in consideration of California Register of Historical Resources (CRHR) and City designation criteria to determine if the properties are considered a historical resource for the purposes of CEQA Guidelines Section 15064.5. This may include accessing local libraries, archives, and contacting relevant historical societies. South Environmental will also review all available building permits and construction documents to determine the nature and extent of alterations made to the property over time. The properties will be evaluated on the required State of California Department of Parks and Recreation Series 523 Forms (DPR forms).

Cultural Resources Report. South Environmental will prepare a Phase I cultural resources technical report that will summarize the results of the records search, NAHC Sacred Lands File search, survey and research methodologies, and results. The report will also discuss the proposed project description, regulatory framework, all sources consulted, recommendations for appropriate management, and analysis of the proposed project's potential to impact cultural resources under CEQA Guidelines Section 15064.5.

Tribal Outreach Assistance. South Environmental will assist the City of Fullerton with Assembly Bill 52 of 2014 (AB 52) and Senate Bill 18 of 2004 (SB 18) consultation with local Native American tribes. South Environmental will contact the California Native American Heritage Commission (NAHC) for a review of their Sacred Lands File and request an AB 52 tribal contact list, if needed. This assistance is assumed to include ghostwriting notification and consultation letters to tribes on City letterhead; mailing letters to tribal contacts; assisting the City with subsequent responses from tribe; and maintaining a detailed record of all AB 52/SB 18 consultation efforts in coordination with City staff.

ENERGY

This task will include an energy analysis pursuant to the requirements of CEQA. This will include an evaluation of energy consumption (electricity, oil, and natural gas) and a review of the Project related to the Title 24, Part 6 of the California Code of Regulations, known as the Building Energy Efficiency Standards (Standards), including the CALGreen standards. This section will provide discussions including the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with energy consumption.

NOISE AND VIBRATION

The assessment of noise and vibration will be based on the CEQA Appendix G Checklist questions for noise and vibration as well as the regulations adopted by the City of Fullerton within the Municipal Code and The Fullerton Plan Noise Element (Chapter 7, Noise). The noise analysis will include the following:

- An ambient noise measurement program that includes long-term measurements (24-hours) at the northern and western Project site boundaries to measure traffic noise levels from Orangethorpe Avenue and Brookhurst Road. Due to the lack of noise sources on the eastern and southern Project site boundaries, short-term noise measurements (20 minutes) will be taken.
- Temporary noise and vibration from the Project's construction activities will be quantified based on noise levels provided in the Federal Transit Administration's *Transit Noise and Vibration Impact Assessment Manual*.
- Long-term Operations phase noise impacts to local noise sensitive receptors will be assessed for mobile and stationary sources attributable to the Project. The operations phase of the Project will generate noise by both mobile sources related to vehicle travel onsite and local roadways. Stationary on-site sources from HVAC units and other sources to assess noise exposure to nearby land uses
- Vibration exposure related to the operations phase will be evaluated qualitatively due to the absence of vibration intensive sources associated with the Project.

If necessary, De Novo Planning Group will recommend mitigation measures to reduce noise, or vibration impacts during both construction and operational phases. In cases where noise and vibration levels surpass established thresholds of significance, De Novo Planning Group will collaborate with the client to identify feasible mitigation options.

The findings of the noise and vibration analyses will be integrated as a section of the environmental document and include summaries of noise terminology, applicable regulations, an overview of the ambient noise environment, and details on any increases in noise levels. This proposal assumes that interior acoustics noise analyses for the proposed Project uses will not be required.

TRANSPORTATION

The De Novo team includes MAT Engineering (MAT) to prepare the transportation study.

Based on the RFP, the City will provide the Transportation Assessment Policies and Procedures (TAPP) to determine whether the Project meets the criteria for a Vehicle Miles Traveled (VMT) Analysis and/or non-CEQA Level of Service (LOS) Study. This scope of work includes review of the TAPP findings prepared for the Project, as MAT Engineering will prepare a VMT screening technical memorandum for the proposed Project to show and document the VMT screening process.

Peer review of the City's TAPP findings and/or VMT screening are included as Optional Task 2, below. Preparation of full VMT model and analysis, if the Project does not screen out for VMT is included as Optional Task 3, below. If it is determined that the Project would require LOS analysis, this is included as Optional Task 4, below. If the LOS analysis is prepared by another firm and peer review of that LOS analysis is required, this is included as Optional Task 5, below.

OPTIONAL TASKS

Optional Task 1 – Health Risk Assessment

Due to the proposed use and proximity to the adjacent Orangethorpe Elementary School and other sensitive receptors, De Novo recommends that an assessment of both operational and construction-related Project air toxics health risks be conducted. In accordance with the requirements of the SCAQMD and guidance from the Office of Environmental Health Hazard Assessment (OEHHA), a Health Risk Assessment (HRA) will be prepared to analyze toxic air contaminants (TAC) impacts from the development of the Project on the nearby sensitive receptors. The emissions of known sources of TACs from the Project will be used to quantify localized public health risks including cancer and non-cancer risks.

The HRA consists of two main efforts: Exposure Assessment and Risk Calculations.

- ***Exposure Assessment:*** The main steps involved in exposure assessment include estimating the emission rates of TACs and running an air pollutant dispersion model to calculate the concentration of TACs at each location in the modeling domain. The modeling domain would include the proposed Project site and the nearby sensitive receptors. The main TAC associated with the Project is diesel particulate matter (DPM). The emission rates of DPM will be calculated for both the construction and operations phases of the Project. For the construction phase, both construction vehicles and haul trucks will be accounted for in the analysis. The assessment of potential operations phase impacts will be based on the annual heavy-duty truck traffic traveling and idling within the Project site, and any other known source(s). The US Environmental Protection Agency's AERMOD air pollutant dispersion model with 5 years of meteorological data collected at the closest monitoring station will be used to calculate local DPM concentrations proximate to the Project site.
- ***Risk Calculations:*** The California Air Resources Board (CARB) Hotspots Analysis and Reporting Program (HARP) is a software suite that addresses the programmatic requirements of the Air Toxics "Hot Spots" Program (Assembly Bill 2588). The HARP is a software suite that calculates the

long-term cancer and non-cancer (i.e., acute and chronic) health risks using the CARB's HARP Air Dispersion Modeling & Risk Tool (ADMRT). The resulting cancer and non-cancer risk contours will be plotted graphically on an aerial exhibit to illustrate potential health risks at nearby land uses near the Project. These risk levels will be assessed against the health risk thresholds adopted by the SCAQMD for the assessment and disclosure of health risk associated with development projects. Any necessary mitigation measures will be discussed with the client to reduce excessive levels of TAC exposure at nearby offsite land uses.

Optional Task 2 – VMT Analysis and Modeling

If the TAPP analysis and findings determine that the Project does not screen out for VMT based on the City's adopted criteria, the MAT Engineering team will prepare a full VMT modeling and analysis based on the City's VMT guidelines and summarize the findings of the analysis in a technical report. If applicable, feasible mitigations will be recommended.

Optional Task 3 – Peer Review of VMT Analysis

If the VMT analysis is conducted by another firm, MAT Engineering can conduct a peer review of that analysis, assuming two rounds of review, including documentation of the findings in a technical memorandum.

Optional Task 4 – LOS Analysis

If the TAPP analysis and findings determine that the Project does not screen out for LOS analysis, MAT Engineering, Inc., will calculate the Project trip generation utilizing the Institute of Transportation Engineers (ITE) 12th Edition trip generation rates. Based on preliminary review of the Project, the 95 residential units can be expected to generate approximately 590 daily trips, which include approximately 39 AM peak hour trips and approximately 49 PM peak hour trips.

Based on preliminary review of the roadway network, and consistent with the previously prepared traffic study for the Project, the traffic study is expected to evaluate up to three (3) study intersections. The analysis will evaluate traffic conditions of the study intersections for the following scenarios:

- Existing Conditions;
- Forecast Existing Plus Project Conditions;
- Forecast Opening Year Without Project Conditions; and
- Forecast Opening Year With Project Conditions.

The following timeframes will be evaluated:

- Weekday AM Peak (7:00 AM to 9:00 AM); and
- Weekday PM Peak (4:00 PM to 6:00 PM).

The analysis will utilize the following parameters:

- Synchro analysis software and the Highway Capacity Manual 7th Edition (HCM 7) methodology or Intersection Capacity Utilization (ICU); and
- Optimized signal timing.

The following detailed scope of work is proposed for the level of service assessment study effort:

- Prepare a Project Scoping Form and obtain an approved scope of work with the City of Fullerton

- Field review the site to determine existing conditions, roadway geometrics and intersection controls
- Obtain existing traffic count data at up to three (3) study intersections during one typical weekday from 7:00 to 9:00 AM and 4:00 to 6:00 PM. This scope assumes the traffic counts do not need to be collected by vehicle classification
- Determine existing levels of service at up to three (3) study area intersections
- Determine the Project's trip generation, trip distribution and traffic assignment to the adjoining roadway system based on ITE trip generation rates
- Derive Project opening year traffic volumes based on a growth rate provided by the City and other specific background projects provided by the agency. This scope does not assume preparation of model runs.
- Determine Project Opening Year traffic conditions for the study scenarios at up to three (3) study area intersections.
- Develop level of service-related improvement measures (i.e. traffic signals, additional traffic lanes, etc.) that may be required to accommodate the Project.

Optional Task 5 – Peer Review of LOS Analysis

If needed, MAT Engineering will peer review a full LOS analysis prepared by others for the Project and provided to MAT Engineering for review and comment. This task also includes review of VMT screening prepared by others (not a full VMT analysis and modeling which is covered under Optional Task 3).

This scope assumes the following:

- The LOS analysis consists of up to three (3) study intersections;
- The analysis evaluates traffic conditions of the study intersections for the following scenarios:
 - Existing Conditions;
 - Forecast Existing Plus Project Conditions;
 - Forecast Opening Year Without Project Conditions; and
 - Forecast Opening Year With Project Conditions.

The following timeframes are evaluated:

- Weekday AM Peak (7:00 AM to 9:00 AM); and
- Weekday PM Peak (4:00 PM to 6:00 PM).

This scope assumes two rounds of review. The results of the peer review will be documented in a technical memorandum.

SECTION B

Based upon the information provided, the Project would not qualify for a Statutory or Categorical Exemption. The Project proposes a zone change and General Plan Amendment; therefore, it does not appear the Project would qualify for a streamlined environmental review pursuant to CEQA Guidelines Section 15183, Projects Consistent with a Community Plan or Zoning, which requires consistency with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

INITIAL STUDY/NEGATIVE DECLARATION OR MITIGATED NEGATIVE DECLARATION (TASK 3B) OR ENVIRONMENTAL IMPACT REPORT (TASK 3C)

The De Novo team will prepare an Initial Study (IS) to address potential impacts associated with the proposed Project. The Initial Study will be prepared consistent with the requirements of CEQA and Appendix G of the CEQA Guidelines. The contents of the Initial Study will be consistent with all applicable provisions of CEQA and the CEQA Guidelines and will incorporate the analysis and findings of the technical studies outlined in Section A (Task 2) above. De Novo will evaluate the necessary information with respect to the existing conditions, the potential adverse effects of Project implementation (both individual and cumulative), and measures to mitigate such effects, if necessary, including those identified in The Fullerton Plan EIR, for the following environmental topical areas:

A. Aesthetics

According to Caltrans Scenic Highway Systems, there are no officially designated State Scenic Highways that traverse the City. Thus, the analysis is anticipated to demonstrate the proposed Project would not have a substantial adverse effect on a scenic vista or substantially damage scenic resources within a state scenic highway. According to The Fullerton Plan, Exhibit 10, Scenic Corridors, there are no City-designated scenic corridors in the vicinity of the Project site. The Project site is located within an urbanized area of the City. Visual impacts from potential construction activities will be discussed and evaluated. The analysis will focus on whether the Project would conflict with applicable zoning and other regulations governing scenic quality as identified in The Fullerton Plan and Fullerton Municipal Code. The analysis will also address the potential for the Project to create a new source of substantial light or glare adversely affecting day or nighttime views in the area. Existing lighting within the Project site and surrounding area will be qualitatively discussed. Project lighting and building materials and their compliance with City lighting standards and requirements will be analyzed.

B. Agriculture and Forestry Resources

The Project site is currently developed with commercial uses and paved with asphalt. The Project site and surrounding area are identified by the California Important Farmland Mapper as Urban and Built-Up Land. The Project site is zoned General Commercial (G-C); the site is not zoned for agricultural or forestry use. It is anticipated the analysis will demonstrate the Project site would not conflict with existing zoning for agricultural use or a Williamson Act contract, conflict with existing zoning or cause rezoning of forest land or the loss of forest land, or result in changes in the environment that could potentially result in the conversion of farmland to non-agricultural use or forest land to non-forest use.

C. Air Quality

This section will consist of the Air Quality Analysis referenced in Section A.

D. Biological Resources

The Project site is currently developed with commercial uses and paved with asphalt. With the exception of West Coyote Hills and East Coyote Hills, The Fullerton Plan EIR states vacant land with natural vegetation supportive of sensitive species does not occur within the City. Generally, areas outside of West Coyote Hills and East Coyote Hills have been previously disturbed or are surrounded by existing development. Given the developed nature of the Project area and site, it is not anticipated that sensitive biological species or habitat occur on-site. The analysis will confirm no riparian habitat or sensitive natural community, wetlands, or wildlife corridors occur within the Project site or surrounding area. Potential removal or alteration of existing trees will be reviewed for consistency with the City of Fullerton Municipal Code, including the City's Community Forest Ordinance.

E. Cultural Resources

This section will incorporate the findings of the Cultural Resources Assessment referenced in Section A.

F. Energy

This section will consist of the Energy Analysis referenced in Section A.

G. Geology/Soils

Utilizing existing resources from the City and information and technical studies provided by the Applicant, the analysis will identify existing regional and local geology and soils constraints (such as compressible soils, landslide hazards, disruptions, displacements, compaction, or over-covering of the soil, and areas subject to subsidence) and seismic hazards. The Project will be evaluated for its potential to directly or indirectly cause substantial adverse effects involving fault rupture, strong seismic ground shaking, seismic-related ground failure (e.g., liquefaction), and landslides. The potential for the Project to impact paleontological resources will also be addressed.

H. Greenhouse Gas Emissions

This section will consist of the Greenhouse Gas Emissions Analysis referenced in Section A.

I. Hazards and Hazardous Materials

A review of hazardous site databases (e.g., California Environmental Protection Agency's (Cal EPA) Cortese List, the Department of Toxic Substances Control EnviroStor database, the State Water Resources Control Board GeoTracker database, Cal-EPA's CAL-SITES Abandoned Site Program Information System (ASPIS) database) indicates the Project site is not listed as a hazardous material site. The GeoTracker Database notes that the existing gas station site at 1730 Orangethorpe Avenue had a leaking underground storage tank; however, the site was appropriately remediated in 1995, and the case was closed in 1999. Utilizing existing resources and information, including any other available technical studies provided by the Applicant, such as a Phase I Environmental Site Assessment, construction and operations of the proposed mixed-use development, including operations of storage/handling practices, will be analyzed. Furthermore, the gas station site will not be removed; therefore, soils beneath the site should not be disturbed as part of the Project. Additionally, the Project site is located within an urbanized area of the City and according to The Fullerton Plan and CAL FIRE. Furthermore, it is not located within an area identified as having the potential for wildfires. The analysis is anticipated to conclude the Project site would not expose people or structures to wildland fires.

J. Hydrology/Water Quality

This analysis will be based in part on information provided by the Applicant, including any hydrology/water quality studies prepared by the Applicant's engineer for the proposed Project. The existing FEMA flood zones and risk of flooding on the Project site and general vicinity will be discussed. We will summarize onsite hydrology and hydraulic calculations (assumed to be provided by Applicant's engineer) under existing and proposed conditions. We will also review the Project plans and other existing information to evaluate the potential construction and operational impacts of the proposed Project on water quality. The surface drainage patterns of the Project area and adjoining areas based on the drainage study/calculations, and improvement plans will be described; surface water quality in the Project area based on existing and available data will also be described. Conformity of the proposed Project to water quality regulations will also be discussed.

K. Land Use and Planning

The Project will require a Major Site Plan and Zone Change from General Commercial (G-C) to Commercial Business District (C-3) and a General Plan Amendment from Commercial to Urban Center Mixed Use. The proposed Project will be reviewed in the context of land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. The Project's consistency with applicable policies of The Fullerton Plan will be assessed, as well as the Project's consistency with development standards of the Fullerton Municipal Code.

L. Mineral Resources

Neither The Fullerton Plan nor The Fullerton Plan EIR discusses significant mineral resources within the City. The Project site is developed with commercial uses and paved parking areas and is not used for mineral resource or recovery activities. The analysis will confirm the Project's location in reference to areas designated by the State Geologist as Mineral Resource Zones. It is anticipated that the analysis will demonstrate the Project site would not result in impacts on mineral resources.

M. Noise

This section will incorporate the findings of the Noise Analysis referenced in Section A.

N. Population and Housing

As the Project includes residential development, it would involve the potential for direct population growth by introducing residential uses to the site. Potential indirect growth-inducing impacts may occur due to the potential for employment opportunities associated with the proposed development of the mixed-use development. However, this would be offset by the existing use. The analysis will address the potential for the Project to induce substantial unplanned population growth based upon growth anticipated locally by The Fullerton Plan and regionally by the Southern California Association of Governments (SCAG) Connect SoCal Regional Transportation Plan/Sustainable Community Strategy. The Project would not displace residential uses, as no residential uses occur within the site.

O. Public Services

The Project does not propose the construction of a new public service (e.g., fire, police, school, park) facilities. Redevelopment of the Project site with the proposed mixed-use development is not anticipated to significantly increase demand for public services when compared to existing conditions. De Novo will contact potentially affected agencies to confirm relevant existing conditions and potential Project impacts. The discussion will focus on the potential to result in the need for new or physically altered governmental facilities, the construction of which could cause a significant environmental impact.

P. Recreation

As the Project introduces residential uses to the site, an evaluation for the Project's potential to significantly increase the use of recreational facilities to the extent that substantial physical deterioration of the facility would occur or be accelerated would be provided. The Project does not include public recreational facilities.

Q. Transportation

As noted in the RFP, it has not been determined if a VMT analysis will be required. Based upon information provided by the City, this section will document whether the Project meets the VMT screening criteria based on the City TAPP assessment or the VMT analysis provided as an optional task, as referenced in Section A.

The analysis will also identify existing transit, roadway, bicycle and pedestrian facilities within the Project area and address any potential for the Project to conflict with a program, plan, ordinance, or policy addressing these facilities. A discussion of the proposed on-site circulation system and potential for the Project to substantially increase hazards or result in inadequate emergency access will be provided.

R. Tribal Cultural Resources

De Novo, in coordination with South Environmental, will assist the City of Fullerton with Native American government-to-government consultation in accordance with AB 52. The City will provide a list of tribes that have requested consultation pursuant to AB 52. South Environmental will draft letters and maps for Native American tribal government contacts to be sent on City letterhead. Native American contacts have 30 days to respond and request further consultation under AB 52. The City will be responsible for responding to any requests for consultation. This scope of work assumes De Novo will participate in up to two (2) hours of conference calls/meetings associated with any consultation requests.

This section will incorporate the findings of the Cultural Resources Assessment referenced in Section A regarding the potential for the Project to impact cultural resources, including any information obtained from Native American tribes as part of the AB 52 consultation process.

S. Utilities/Service Systems

The ability of existing infrastructure to support the proposed development will be confirmed, including assessing the relocation or construction of new or expanded facilities and the potential to result in an environmental effect. The discussion will focus on the potential alteration of existing facilities, extension, or expansion of new facilities and the increased demand on services based on the proposed land uses based in part on information provided by the Applicant and the City, including the Utilities Plan. Utilities addressed include water, wastewater, solid waste, electricity, natural gas, and telecommunications.

T. Wildfire

According to the Fire Hazard Severity Zone Maps produced by CAL FIRE, the Project site is not located within or near a state responsibility area or lands classified as very high fire hazard severity zones. It is anticipated that the analysis will conclude the Project site would not result in impacts associated with wildfire.

U. Mandatory Findings of Significance

This section will focus on the cumulative effects and the potential for the Project to have environmental effects which will cause substantial adverse effects on human beings based in part on the analysis conducted as part of the previous environmental topical areas.

Preparation of the technical studies and Initial Study will inform preparation of either an MND or EIR.

ATTACHMENT A

TASKS		COST	
		IS/MND	EIR
TASK 1: PROJECT INITIATION			
1.1	Project Kickoff Meeting	\$720	\$720
1.2	Research and Review of Existing Information/Site Visit	\$1,590	\$1,590
1.3	Project Description	\$4,830	\$4,830
TASK 2: TECHNICAL ANALYSIS/STUDIES			
2.1	Proposed Technical Analysis		
2.1.1	Air Quality and Greenhouse Gas Emissions	\$8,320	
2.1.2	Cultural Resources	\$18,308	
2.1.3	Energy	\$4,160	
2.1.4	Noise and Vibration	\$7,800	
2.1.5	Transportation	\$2,720	
TASK 3: ENVIRONMENTAL DOCUMENTATION			
TASK 3A: N/A (CATEGORICAL EXEMPTION)			N/A
TASK 3B: INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND)			
3.1	Administrative Draft IS/MND	\$13,090	N/A
3.2	Second Administrative Draft IS/MND	\$6,840	N/A
3.3	Public Review Draft IS/MND	\$3,190	N/A
3.4	Final IS/MND		
3.4.1	Responses to Comments	\$4,830	N/A
3.4.2	Mitigation Monitoring and Reporting Program	\$1,070	N/A
3.5	Notice of Determination	\$380	N/A
TASK 3C: ENVIRONMENTAL IMPACT REPORT (EIR)			
3.1	Administrative Draft EIR	N/A	\$53,100
3.2	Revised Draft EIR	N/A	\$22,440
3.3	Screencheck Draft EIR	N/A	\$10,390
3.4	Public Review Draft EIR	N/A	\$6,480
3.5	Final EIR	N/A	

TASKS		COST	
		IS/MND	EIR
3.5.1	Responses to Comments/Admin Draft Final EIR	N/A	\$11,180
3.5.2	Mitigation Monitoring and Reporting Program	N/A	\$1,070
3.5.3	Final EIR	N/A	\$4,800
3.5.4	Findings of Statement of Overriding Considerations	N/A	\$7,640
3.5.5	Notice of Determination	N/A	\$380
TASK 4: PROJECT MANAGEMENT, COORDINATION MEETINGS, AND PUBLIC HEARINGS			
4.1	Project Management	\$2,600	\$5,200
4.2	Project Coordination Meetings	\$2,670	\$4,360
4.3	Public Hearings (2 Planning Commission and 2 City Council)	\$3,960	\$3,960
4.4	Scoping Meeting and Notice of Preparation	N/A	\$5,860
Subtotal Professional Fees		\$69,630	\$172,230
Estimated Direct Expenses		\$1,500	\$2,500
Contingency at 10% Professional Fees (including consultant labor)		\$6,677	\$16,584
Total Cost Estimate		\$74,947	\$184,924
<i>Optional Task 1 – Health Risk Assessment</i>		\$10,400	
<i>Optional Task 2 – VMT Analysis</i>		\$19,900	
<i>Optional Task 3 – VMT Peer Review</i>		\$4,900	
<i>Optional Task 4 – Preparation of LOS Analysis</i>		\$6,900	
<i>Optional Task 5 – LOS Peer Review</i>		\$5,200	
Additional Consultant Assumptions			
(1) Upon City approval of the Project Description and initiation of the technical analysis, no additional modifications are anticipated.			
(2) De Novo will respond to one complete set of comments from City staff on the Administrative Draft. The Second Administrative Draft will be provided to City staff with all revisions made in track changes to assist in review of the document. De Novo will respond to a second set of comments from City staff and prepare the Final Exemption or IS/MND for public review.			
(3) De Novo will mail the NOI to the City-approved distribution list. A maximum of 30 notices are assumed. The City will be responsible for any required newspaper notices and radius mailings for the Project.			

TASKS	COST	
	IS/MND	EIR
(4) De Novo will prepare responses to comments received on the Draft IS/MND during the 30-day public review period and on the Draft EIR during the 45-day public review period. De Novo will address one complete set of comments from City staff on the Draft Responses to Comments and will provide the revisions in track changes for ease of review. De Novo will respond to a second set of comments and finalize this section for inclusion in the Final MND or the Final EIR. At this time, the extent of public and agency comments that will result from the review process is unknown. This task assumes a maximum budget for the preparation of responses to comments. Should the level of comments and responses exceed our budgeted estimate, De Novo will submit additional funding requests to the City. The scope of work does not assume supplemental technical studies or extensive additional analysis will be required to provide responses to comments.		
(5) Progress meetings and periodic conference calls are anticipated throughout the work program to discuss progress, review comments on Administrative documents, and receive any necessary direction from City staff. It is anticipated these meetings will occur via conference call.		
(6) De Novo Planning Group reserves the right to reallocate budget between various consulting team members and between tasks, provided the overall project budget does not change.		
(7) Subconsultants and Direct Costs are billed at no markup. Direct costs are based on the number of hard copies identified in the RFP. Filing fees and the Orange County Clerk are included in the direct costs; however, CDFW filing fees are not included.		

ATTACHMENT B

TASKS		PROPOSED SCHEDULE	
		IS/MND	EIR
TASK 1: PROJECT INITIATION			
1.1	Project Kickoff Meeting	Week 1	
1.2	Research and Review of Existing Information/Site Visit	Weeks 1 – 2	
1.3	Project Description - Preparation by De Novo - Review and approval by City	Weeks 2 – 3 Week 4	
TASK 2: TECHNICAL ANALYSIS/STUDIES			
2.1	Proposed Technical Analysis ¹		
2.1.1	Air Quality and Greenhouse Gas Emissions	Weeks 5 – 9	
2.1.2	Cultural Resources	Weeks 4 – 9	
2.1.3	Energy	Weeks 5 – 9	
2.1.4	Noise and Vibration	Weeks 5 – 9	
2.1.5	Transportation – VMT Screening	Week 5	
TASK 3: ENVIRONMENTAL DOCUMENTATION			
3.1	Administrative Draft IS/MND - Preparation by De Novo - Review by City	Weeks 4 – 11 Weeks 12 – 13	N/A
3.2	Second Administrative Draft IS/MND - Preparation by De Novo - Review by City	Week 14 – 15 Weeks 16 – 17	N/A
3.3	Public Review Draft IS/MND Preparation - 30-day public review	Week 18 Weeks 19 – 22	N/A
3.4	Final IS/MND		
3.4.1	Responses to Comments - Preparation by De Novo - Review by City - De Novo Finalizes Responses to Comments	Weeks 22 – 23 Weeks 24 – 25 Week 26	N/A
3.4.2	Mitigation Monitoring and Reporting Program - Preparation by De Novo - Review by City	Week 24 Week 25	N/A

TASKS		PROPOSED SCHEDULE	
		IS/MND	EIR
- De Novo Finalizes MMRP		Week 26	
TASK 3C: ENVIRONMENTAL IMPACT REPORT (EIR)			
3.1	Administrative Draft EIR - Preparation by De Novo - Review by City	N/A	Weeks 5-16 Weeks 17-20
3.2	Revised Draft EIR - Preparation by De Novo - Review by City	N/A	Weeks 20-24 Weeks 25-27
3.3	Screencheck Draft EIR - Preparation by De Novo - Review by City	N/A	Weeks 28-30 Weeks 31-32
3.4	Public Review Draft EIR - Preparation by De Novo - Review by City - De Novo Finalizes for Public Review - 45-day Public Review Period	N/A	Week 33 Week 34 Week 35 Weeks 35-43
3.5	Final EIR	N/A	
	3.5.1 Responses to Comments/Admin Draft Final EIR - Preparation by De Novo - Review by City	N/A	Weeks 44-48 Weeks 49-50
	3.5.2 Mitigation Monitoring and Reporting Program - Preparation by De Novo - Review by City	N/A	Week 46 Week 47
	3.5.3 Final EIR - Preparation by De Novo - Review by City - De Novo Finalizes Final EIR	N/A	Week 48 Week 49 Week 50
	3.5.4 Findings of Statement of Overriding Considerations - Preparation by De Novo - Review by City	N/A	Week 51 Week 52
	3.5.5 Notice of Determination	N/A	TBD

TASKS	PROPOSED SCHEDULE	
	IS/MND	EIR
TASK 4: PROJECT MANAGEMENT, COORDINATION MEETINGS, AND PUBLIC HEARINGS		
4.1 Project Management	Ongoing	Ongoing
4.2 Project Coordination Meetings	Ongoing	Ongoing
4.3 Public Hearings (2 Planning Commission/2 City Council)	To be determined	To be determined
4.4 Scoping Meeting and Notice of Preparation	N/A	Weeks 23-28
Note: 1. Optional Tasks, dependent upon City review of Scoping Agreement and materials.	Weeks 5 –12	
Additional Schedule Assumptions		
(1) If consultation is requested pursuant to AB 52, the timing will likely be extended to accommodate the Tribe's schedule and timing needed to conduct and conclude the consultation process.		