

Table A – Preliminary Comments:

Completed (Staff Use)	Comment Number	Sheet No.	Staff Comment	Applicant Response
Community Development Department, Planning Division: Kelly Ribuffo, Associate Planner (714) 744-7223 or kribuffo@cityoforange.org				
	1.	CEQA	<p>The scoping period for the Initial Study and NOP for the original submittal occurred between May 15, 2015 and June 15, 2015. A public scoping meeting was held on May 27, 2015. At the time, it was established that an Environmental Impact Report (EIR) would be required to be prepared in conjunction with the Specific Plan update.</p> <p>Planning Division staff has reviewed the revised Specific Plan document and attached memorandum and determined that release of a new NOP is required as part of the environmental review process. Significant changes have been made to the project description and limits of the project that warrant a new baseline be set for analysis moving forward. Therefore, the baseline for all technical reports associated with the EIR shall be December 2019.</p> <p>The release of the updated NOP is tentatively scheduled for December 12, 2019, with a proposed 45-day review period. A new scoping meeting will be held on January 16, 2019.</p> <p>Per Government Code Section 15063(a), preparation of a new</p>	Comment noted.

			Initial Study is not required, as an EIR will clearly be required for this project.	
	2.	General	<p>This Specific Plan amendment proposed to add additional properties to the SPA and simultaneously remove those properties from the Santa Fe Depot Specific Plan Area. This is consistent with previous amendment to the Depot Specific Plan, where Chapman-owned properties were removed from the plan area.</p> <p>However, with the continued removal of properties from the Depot Specific Plan, staff has concerns about what interface issues may be created between the two Specific Plans – both Specific Plans may conflict or erode the design, preservation, and development intent for the Santa Fe Depot area, which is a listed historic resource.</p> <p>Should the request for removal of properties from the Depot Specific Plan area move forward, staff requests that analysis be provided showing how the Chapman University Specific Plan is responsive to the planning and preservation priorities in the area that it interfaces with the Depot Specific Plan.</p>	A discussion on how the CUSP responds to the planning and preservation priorities is provided in Section 2.4.7. Santa Fe Depot Specific Plan.
	3.	General	<p>Several university-associated facilities are located adjacent to or outside of the proposed Specific Plan Area (SPA), including:</p> <ul style="list-style-type: none"> • Campus offices along Glassell Street north of Walnut Avenue 	<ul style="list-style-type: none"> • Campus offices along Glassell Street north of Walnut Avenue –

			<ul style="list-style-type: none"> • Panther Village (W. Chapman Avenue) • Chapman Grand Apartments (City of Anaheim) • Rinker Health Science Campus (City of Irvine) <p>Though none of these facilities is directly within the SPA, consideration should be given to how these facilities function in conjunction with the main campus area, and how patterns of travel (vehicular or pedestrian) may impact campus planning now and in the future. These facilities may also impact technical analysis related to the draft EIR, such as transportation and land use.</p> <p>Staff recommends integrating discussion of these facilities within Section 3 – Development Plan and Section 4 – Community Facilities & Services Plan, and other sections as appropriate.</p> <p>Staff does not consider single family residences outside of the SPA used for faculty and staff housing as facilities of concern for this comment.</p>	<p>these ancillary uses serve as offices and conference rooms for faculty and other administrative uses Thompson Policy Institute and the Risk Management Department. These uses are compatible with the surrounding land uses, and there is minimal pedestrian traffic between these offices and the campus. Any potential land use impacts would be analyzed in the EIR.</p> <ul style="list-style-type: none"> • Panther Village (W. Chapman Avenue) – The majority of Panther Village residents use the shuttle to travel to campus – see text added to Section 3.3.9. Any potential transportation impacts would be analyzed in the EIR. • Chapman Grand Apartments (City of Anaheim) – The majority of Chapman Grand residents use the shuttle to travel to campus – see text added to Section 3.3.9. Any potential transportation impacts would be analyzed in the EIR. • Rinker Health Science Campus
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				(City of Irvine) – Students at Rinker Health Science Campus are graduate students and are not counted in the total FTE students at the Orange campus (as stated in Section 3.5). Graduate courses are provided at the Irvine campus, thus these students do not need to travel to the Orange campus except for few administration matters. Students and faculty who occasionally commute to the Orange campus can take the shuttle to the Irvine train station and take the train to Orange. Any potential transportation impacts would be analyzed in the EIR.
	4.	Section 1	<p><u>Section 1.3.3 Surrounding Uses and Characteristics (Page 1-10)</u></p> <p>Paragraph 3, please refer to the Cypress Street Barrio by name, using the boundaries as established in the 2010 City of Orange General Plan, as it has been established as a planning area of cultural interest.</p>	See revised text at the end of Section 1.3.3, paragraph 3.
	5.	Section 2	<u>Policy 7.3 (Page 2-5)</u>	After further review, the open space requirement remains unchanged at 30%.

			Policy has been revised to decrease the minimum campus open space requirement from 30% to 25%. Staff requests a justification for why the open space requirement is being reduced campus-wide.	
	6.	Section 2	<p><u>Section 2.4.3 Historic Preservation Design Standards</u></p> <p>Please use “National Register-listed” rather than “Nationally Registered” when referring to the Old Towne Historic District or other similarly listed properties.</p> <p>There is a distinction between the boundaries of the National Register-listed and locally designated Old Towne Historic District boundaries (refer to the City’s zoning map.) Therefore, it is important to be specific throughout this section when referring to one or the other.</p>	See revised Section 2.4.3 per City comment.
	7.	Section 3	<p><u>Section 3.2.6 Future Conceptual Development (Page 3-4)</u></p> <p>Column 2, Paragraph 3, replace “non-contributing” with “non-historic”.</p>	Section 3.2.6 has been updated and “non-contributing” is no longer part of the text – please review the updated section.
	8.	Section 3	<p><u>Section 3.2.7 Musco Center (Page 3-5)</u></p> <p>Subsection F, improvements to the Arts Plaza must either conform with the approved landscape plan for the Center for the</p>	Comment noted.

			Arts project approval, or return to the Design Review Committee for substantial modification, per the conditions of approval for the project.	
9.	Section 3	<u>Section 3.3.2 Collector Streets (Page 3-8)</u> Please provide additional information regarding the fire plan north of Glass Hall and the idea that it may be converted into a street for future circulation purposes. The Fire Department may want to comment on this item, even though it is not a change from Amendment #6.		Text has been revised to require Site Plan Review approval for such conversion.
10.	Section 3	<u>Section 3.3.3 Local Streets (Pages 3-8 and 3-9)</u> Remove all reference in text and figures to the potential closure of N. Cypress Street between Maple Avenue and Palm Avenue. The City is not amenable to the closure. This is an issue that had been resolved prior to the Specific Plan update being suspended.		All references (text and maps) to the potential closure of N. Cypress Street has been removed from the Specific Plan.
11.	Section 3	<u>Exhibit 3.6 Open Space and Recreation Plan (Page 3-17)</u> Add new quad and opens spaces created with construction of The K to this exhibit. Also, add discussion of K facilities to Section 3.4 as appropriate.		Outdoor spaces at The K Residence and VPO site have been added to Exhibit 3.6 and text added to Section 3.4.

	12.	Section 3	<p><u>Section 3.5 Student Enrollment (Page 3-23)</u></p> <p>How many units are undergraduate and graduate students required to take in order to be consider “full-time” students? Are they different?</p>	<p>Each student taking a minimum of 12 units per semester in undergraduate or graduate instruction is considered one FTE student – see Section 3.5. A supplemental memo has been submitted to the City detailing student enrollment.</p>
	13.	Section 3	<p><u>Section 3.6 Student Housing (Page 3-24)</u></p> <ul style="list-style-type: none"> • Provide a definition of freshman and sophomores. How many students on average take more than 4 years to complete undergraduate degree? Are there any 5-year programs? • End of Paragraph 2 states that “the required housing may be reduced by 50 percent should existing student housing be demolished...” etc. What is the proposed solution to handle a large number of displaced students during construction? Will the University provide alternative housing options? Will students have to find their own housing? This leaves a large area of uncertainty for the surrounding community in terms of impacts to housing demand. Further discussion is required on this topic. 	<ul style="list-style-type: none"> • For purposes of the student housing discussion, freshman and sophomores are first- and second-year undergraduate students – see Section 3.6. • Text has been updated to require a student housing contingency plan, and a displacement plan if needed, as part of any project requiring demolition of student housing.
	14.	Section 3	<p><u>Section 3.7 Quality of Life Initiatives (Page 3-24 to 3-25)</u></p>	<p>Text has been updated to include a description of the Neighborhood</p>

			<p>What, if any, role does the City have for the review or enforcement of any of these policies? Especially as the proposed language gives the University autonomy to add, modify, or discontinue any of the proposed programs listed in the Specific Plan. How can the City ensure that these requirements are being met?</p> <p>Language should be added to the Specific Plan indicating that the ongoing effectiveness of the programs shall be reviewed by the University and Neighborhood Advisory Committee on a regular (quarterly or bi-annual) basis at meetings including the City Manager and Police Chief.</p>	<p>Advisory Committee, its function and continuation as one of the existing channels that facilitate communication between the University, City representative, stakeholder groups and community at large.</p>
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Public Works Department, Right-of-Way Section:
 Mark Winters, Real Property Agent
 (714) 744-5558 or mwinters@cityoforange.org

	62.	Section 3	<p><u>Section 3.3.3 Local Streets</u></p> <p>The vacation of N. Cypress Street between Maple Avenue and Palm Avenue is not contemplated in the city’s Master Plan of Streets and Highways. Street closure is also contrary to the city’s goal of maintaining this historic grid of streets and sidewalks in Old Towne. Public Works will not support the continued request to vacate Cypress Street, and the request should be removed from this and any other section of the Specific Plan where it is referenced.</p>	<p>Please see the response to City comment #10.</p>
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Public Works Department, Administration Division:

Joshua Soliz, Administrative Manager (714) 744-5588 or jsoliz@cityoforange.org				
	63.	Section 4	<p><u>Section 4.3.3 - Solid Waste Disposal</u></p> <p>Please update this section to include the following:</p> <ul style="list-style-type: none"> • Update where solid waste is delivered (as it can be any of the three OC landfills) • Add how recyclables will be handled • Add how organics (green and food) waste will be handled • Add how edible food recovery will occur • Add how CND will be handled <p>Please contact staff if you have any questions about the City’s policies regarding trash/recycling/organics service.</p>	<p>See revised Section 4.3.3. The Specific Plan does not include discussions on how green and food waste, edible food recovery, and construction and demolition waste is handled, because these areas are subject to evolving state-wide regulations that could make such discussion in the Specific Plan obsolete within a few years. Generally, the Specific Plan includes information related to service providers, while information addressing federal, state and local regulations is provided in the DEIR.</p> <p>However, in response to the City’s request, below is a summary of Chapman’s current operations regarding food and green waste, edible food recovery, and construction waste management:</p> <ul style="list-style-type: none"> • Food waste is collected on-site in various areas on the main campus. Food waste generated in the Randall Dining Commons is processed using the EnviroPure Food digester. • Green waste is handled by a

				<p>landscaping contractor, Brightview. All green waste is collected and hauled to their yard waste recycler.</p> <ul style="list-style-type: none"> • Edible food from catered events is recovered first on campus by offering it to the students. For large amounts of edible food, Chapman partners with ChowMatch to distribute it to food pantries in the surrounding area. • Construction and demolition waste management is regulated by the State. Current regulations require that a minimum of 65% of all nonhazardous construction-related waste is recycled. Chapman’s contractors comply with all applicable regulations regarding construction waste reduction, disposal and recycling.
<p>Public Works Department, Subdivision Division: Medel Llanes, Senior Civil Engineer (714) 744-5535 or mllanes@cityoforange.org</p>				
	64.	Section 3	<p><u>Section 3.3.3 Local Streets (Page 3-8)</u></p> <p>The City does not have any plans to vacate Cypress Street</p>	<p>Please see the response to City comment #10.</p>

			<p>between Palm Avenue and Maple Avenue. There are existing sewer mains, street lighting, and water mains running along this segment of Cypress Street that serve the general public.</p>	
	<p>65.</p>	<p>Section 4</p>	<p><u>Section 4.1.2 Sewer (Page 4-1)</u></p> <p>Existing 6-inch sewer mains are considered to be deficient and need to be upgraded to a minimum of 8-inch diameter. Other deficient sewer mains would need to be upsized accordingly.</p> <p><u>Section 4.1.3 Storm Drainage (Page 4-4)</u></p> <p>Identify existing main line storm drain deficiency based on the City of Orange 1997 Master Plan of Drainage. Storm drain deficiencies within and downstream of the Specific Plan area need to be addressed with proposed projects.</p>	<p><u>Section 4.1.2 Sewer (Page 4-1)</u></p> <p>Exhibit 4.2, Sewer System Plan has been updated per input provided by civil engineer DRC. Please see new text regarding future sewer system improvements. The EIR will include a sewer capacity analysis as part of the review. If additional improvements are necessary, they will be incorporated in the Specific Plan.</p> <p><u>Section 4.1.3 Storm Drainage (Page 4-4)</u></p> <p>Exhibit 4.3, Storm Drain System Plan has been updated per input provided by civil engineer DRC. The current text states that any proposed projects shall be required to provide the City of Orange with calculations proving that the downstream system is not adversely impacted by the new construction. The EIR will include a drainage analysis as part of the review. If additional improvements are necessary, they will</p>

				be incorporated in the Specific Plan.
Multiple Departments				
	72.	Section 4	<p>Per previous comments, Public Works, Police, and Fire would like to see expansion of the discussion in the section related to city services. The current format of the section is abbreviated, and does not do an adequate job of describing how Chapman University interacts with, utilizes the services of, and complies with the policies of these departments. Please contact the representative of each department for additional discussion of the expectations for this section beyond the comments provided in this letter.</p>	<p>Generally, the detailed analyses are conducted as part of the Draft EIR process. Regulations and information related to service times, service standards, compliance with policies, etc. are subject to change and should not be documented within the Specific Plan. For example, if the Police, Fire, or Public Works Departments were to modify a City policy or regulation, then the Specific Plan would become inconsistent with said City regulation. As a result, the City would need to initiate a Specific Plan Amendment to maintain the document's consistency.</p> <p>With that said, detailed infrastructure and public service analyses will be conducted as part of the DEIR process. If it is determined during this process that the Specific Plan needs to be modified to be consistent with City policies or regulations, then revisions will be made to the appropriate section(s) of the Specific Plan.</p>