

COMMENTS & RESPONSES TO COMMENTS
FOR THE
MITIGATED NEGATIVE DECLARATION
& INITIAL STUDY

CITY OF LA HABRA
VISTA GRANDE PARK IMPROVEMENT PROJECT
LA HABRA CA 90631



LEAD AGENCY:

CITY OF LA HABRA
COMMUNITY DEVELOPMENT DEPT. & PUBLIC WORKS DEPT.
110 EAST LA HABRA BOULEVARD
LA HABRA, CALIFORNIA 90631

REPORT PREPARED BY:

BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING
2211 SOUTH HACIENDA BOULEVARD, SUITE 107
HACIENDA HEIGHTS, CALIFORNIA 91745

JULY 19, 2019

LHAB-032

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1. COMMENTS AND RESPONSES TO COMMENTS

The City circulated the Mitigated Negative Declaration and Initial Study for a 20-day review period. Comment letters to date, were received from the following agencies and entities at the conclusion of the review period:

Letter Dated July 17, 2019
Scott Shelley
Branch Chief, Regional-IGR-Transit-Planning
Department of Transportation District 12
1750 E. Forth Street, Suite 100
Santa Ana, California 92705

Letter Dated July 15, 2019
Richard Vuong Manager Planning Division
OC Public Works Service Area / OC Development Services
300 North Flower Street
Santa Ana, California 92702-4048

Letter Dated July 08, 2019
Michael Awad
Resident
La Habra, California 90631

Letter Dated July 11, 2019
Ayman Matta, Mariam Matta
Residents
La Habra, California CA 90631

Letter Dated July 12, 2019
Kathryn Cross, REHS, Supervising Hazardous Materials Specialist
Solid Waste Local Enforcement Agency
Environmental Health
1241 E. Dyer Road, Suite 120
Santa Ana, California 92705

Letter Dated July 9, 2019
Dan Phu, Manager Environmental Programs
Orange County Transportation Authority
550 South Main St.
Orange, California 92863-1584

Letter Dated July 5, 2019

Noah Zeko

Resident

La Habra, California 90631

Letter Dated July 16, 2019

Mike Campisi, Pipeline Planning Assistant

SoCalGas Transmission Technical Services

9400 Oakdale Avenue

Chatsworth, California 91311

Response to Comment Letter Dated July 17, 2019

Scott Shelley

Branch Chief, Regional-IGR-Transit-Planning

Department of Transportation District 12

Comment 1

Thank you for including the California Department of Transportation (Caltrans) in the review of an Initial Study (IS) for the city of La Habra. Caltrans mission is to offer a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

Response 1.

The comment has been noted for the record.

Comment 2.

The proposed project will involve improvements to the existing 17.5-acre park. The proposed project includes two alternative project designs. Alternative A will create an active recreational park and will feature a number of recreational amenities including walking and running trails, a soccer/football field, a split large/small dog park, picnic and free play areas, a tot-lot play area, parking lots, covered storage area for athletic equipment, a trash enclosure, and a restroom, storage and snack bar building. Optional park features for Alternative A may include exercise stations, volleyball courts, basketball half-courts and an amphitheater.

Response 2.

The comment has been noted for the record.

Comment 3.

The proposed project involves various improvements to the existing Vista Grande Park located on the southeast corner of Lambert Road and Idaho Street in the central portion of the City. The park's legal address is 1100 Lambert Road. The park is located half of a mile east of: SR 39 and a little over a quarter mile north of SR 90. SR 90 and SR 39 are both owned and operated by Caltrans. Caltrans is a responsible agency and has the following comments:

Response 3.

The comment has been noted for the record.

Comment 4.

Please include a discussion of bicycle, pedestrian, and transit impacts. These impacts are not discussed in the document, yet the document notes that there will be a less than significant impact, in the City's General Plan. Mobility/ Circulation Element (2014), Goals AT 1, 2, and 3 and their respective policies support improved transit, bicycle, and pedestrian facilities.

Response 4.

The proposed project will not impact any existing or proposed bicycle trails or bike lanes identified in the City's Bicycle Master Plan. As indicated in the project description (page 17), benches and walking and running trails will be constructed along the perimeter of the park. The ground surface of the trails will consist of compacted dirt. Finally, the proposed project will not affect any existing bike lanes on Lambert Road or Idaho Street. In addition, the proposed park project will not extend beyond the park boundaries into Coyote Creek and thus, any future bicycle trail along the creek will not be adversely impacted by the proposed park improvements. It should be noted that a walking trail, benches, and fountains will be located in the area so some future connection may be possible.

Comment 5.

Please consider analyzing impacts to the City's existing and proposed bicycle facilities. The project is surrounded by existing bicycle facilities, and a proposed bicycle facility runs directly through the site. The park is also considered a "key destination" in the City of La Habra's Bikeway Master Plan (2017). Thus, the project site is an important part of the City's bicycle network. According to the Bikeway Master Plan, there are existing bicycle facilities on:

- *Lambert Road, Class II bicycle lanes;*
- *Idaho Street, Class III bicycle route; and*
- *Las Lomas Drive, Class III bicycle route.*
- *There are proposed facilities on: Monte Visto Street, Class III bicycle route; and Coyote Creek Channel, Class I bicycle path (runs directly through project site).*

Additionally, a proposed section of the OC Loop is located approximately 0.4 miles north of the project site. Please consider incorporating this into the project analysis, as visitors of Vista Grande Park may utilize the OC Loop, a regionally significant Class I trail.

Response 5

The evaluation of the existing and proposed bicycle system in the City is beyond the scope of the Vista Grande Park Improvement Project. The Citywide bicycle facilities were also analyzed in the City's General Plan Environmental Impact Report. The reference to the OC Loop Trail has been incorporated into the Initial Study and administrative record by reference. Please refer to Section 2 of

this Comments and Response to Comments document.

Comment 6.

Please consider adding appropriate safety measures to ensure the safety of bicyclists and pedestrians in the project area. These measures may include improved Complete Streets facilities and improved connections to these facilities. Wayfinding signage may also be beneficial to park visitors. These improvements will also improve regional connectivity.

Response 6.

The comment is noted for the record. The only roadways that will be included within the park is an internal drive aisle. Wayfinding signage will be incorporated into the new park as required especially along the new walking/jogging trail.

Comment 7.

Please consider analyzing the impacts / coordinating with the Volara Townhomes proposed project. The Volara Townhomes are located approximately one-mile northeast of Vista Grande Park.

Response 7.

The City is overseeing the preparation of an Environmental Impact Report for the aforementioned residential development. The Vista Grande park project is considered a related project for the purposes of the cumulative analysis.

Comment 8.

Planning recommends that bicycle parking racks be included in this park improvement project. Secure bicycle parking can encourage multi-modal access to the park. The 2017 City of La Habra Bikeway Master Plan also proposes a short-term bicycle parking rack at Vista Grande Park (Page 64). Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, do not hesitate to contact Julie Lugaro at (657) 328-6368 or Julie.lugaro@dot.ca.gov.

Response 8.

The comment is noted for the record. Bicycle racks will be provided within the parking lots. The City will continue to cooperate with CalTrans in subsequent phases planning and design.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION

District 12
1750 EAST FOURTH STREET, SUITE 100
SANTA ANA, CA 92705
PHONE (657) 328-6368
FAX (657) 328-6510
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

July 17, 2019

Chris Schaefer

City of La Habra
201 East La Habra Blvd.
La Habra, CA 90631

File: IGR/CEQA
12-ORA-2019-01158
Vista Grand Park
SR 90 PM 1.019
SR 39 PM 19.482

Dear Mr. Schaefer,

Thank you for including the California Department of Transportation (Caltrans) in the review of an Initial Study (IS) for the city of La Habra. Caltrans mission is to offer a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

The proposed project will involve improvements to the existing 17.5-acre park. The proposed project includes two alternative project designs. Alternative A will create an active recreational park and will feature a number of recreational amenities including walking and running trails, a soccer/football field, a split large/small dog park, picnic and free play areas, a tot-lot play area, parking lots, covered storage area for athletic equipment, a trash enclosure, and a restroom, storage and snack bar building. Optional park features for Alternative A may include exercise stations, volleyball courts, basketball half-courts and an amphitheater. Alternative B will create a passive recreational park and will include park gardens and passive open space, picnic and free play areas, a split large/small dog park, a tot-lot play area, benches and trails for walking and running, a restroom and storage building, parking lots and a trash enclosure. Optional park features for Alternative B may include an amphitheater, a volleyball court and a basketball half-court.

The proposed project involves various improvements to the existing Vista Grande Park located on the southeast corner of Lambert Road and Idaho Street in the central portion of the City. The park's legal address is 1100 Lambert Road. The park is located half of a mile east of SR 39 and a little over a quarter mile north of SR 90. SR 90 and SR 39 are both owned and operated by Caltrans. Caltrans is a responsible agency and has the following comments:

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

City of La Habra
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Systems Planning

- Please include a discussion of bicycle, pedestrian, and transit impacts. These impacts are not discussed in the document, yet the document notes that there will be a less than significant impact. In the City's General Plan Mobility/Circulation Element (2014), Goals AT 1, 2, and 3 and their respective policies support improved transit, bicycle, and pedestrian facilities.
 - o Please consider analyzing impacts to the City's existing and proposed bicycle facilities. The project is surrounded by existing bicycle facilities, and a proposed bicycle facility runs directly through the site. The park is also considered a "key destination" in the City of La Habra's Bikeway Master Plan (2017). Thus, the project site is an important part of the City's bicycle network.

According to the Bikeway Master Plan, there are existing bicycle facilities on:

 - Lambert Road, Class II bicycle lanes;
 - Idaho Street, Class III bicycle route; and
 - Las Lomas Drive, Class III bicycle route.

There are proposed facilities on:

 - Monte Vista Street, Class III bicycle route; and
 - Coyote Creek Channel, Class I bicycle path (runs directly through project site).
 - o Additionally, a proposed section of the OC Loop is located approximately 0.4 miles north of the project site. Please consider incorporating this into the project analysis, as visitors of Vista Grande Park may utilize the OC Loop, a regionally significant Class I trail.
- Please consider adding appropriate safety measures to ensure the safety of bicyclists and pedestrians in the project area. These measures may include improved Complete Streets facilities and improved connections to these facilities. Wayfinding signage may also be beneficial to park visitors. These improvements will also improve regional connectivity.
- Please consider analyzing the impacts / coordinating with the Volara Townhomes proposed project. The Volara Townhomes are located approximately one-mile northeast of Vista Grande Park.
- Planning recommends that bicycle parking racks be included in this park improvement project. Secure bicycle parking can encourage multi-modal access to the park. The 2017 City of La Habra Bikeway Master Plan also proposes a short-term bicycle parking rack at Vista Grand Park (page 64).

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

City of La Habra
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Page 3

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, do not hesitate to contact Julie Lugaro at (657)-328-6368 or Julie.Lugaro@dot.ca.gov.

Sincerely,



SCOTT SHELLEY
BRANCH CHIEF, REGIONAL-IGR-TRANSIT PLANNING
DISTRICT 12

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Response to Comment Letter Dated July 15, 2019
Richard Vuong Manager Planning Division
OC Public Works Service Area / OC Development Services
300 North Flower Street
Santa Ana CA 92702-4048

Comment 1.

Thank you for the opportunity to comment on the Notice of Intent to Adopt a Mitigated Negative Declaration for the Vista Grande Park Improvement Project. The County of Orange offers the following comments for your consideration.

Response 1.

The comment has been noted for the record.

Comment 2.

The discussion on hydrology and water quality (Section 3.10, page 80) should clarify whether or not the project qualifies as a “Priority Development Project” under the city’s municipal stormwater permit (Board Order R8-2009-0030), thereby requiring preparation of a “Project Water Quality Management Plan” (WQMP), or is instead a “Non-Priority Project”, which would require preparation of a “Non Priority Water Quality Project Plan.” The document references the need for a mandatory WQMP without this context.

Response 2.

The comment has been noted for the record. This additional information has been incorporated into the Initial Study and administrative record by reference. Please refer to Section 2 of this Comments and Response to Comments document.

Comment 3.

Please be advised that the Coyote Creek Channel (Facility No. A01) contains deficient reaches that are not capable of conveying runoff from the 100-year storm event. Therefore, any increase in runoff (if any) should be appropriately mitigated to ensure existing conditions are not made worse as a result of the project.

Response 3.

The comment is noted for the record. The proposed park project will not drain into or otherwise affect the existing Coyote Creek Channel. Furthermore the existing Coyote Creek Channel will not be altered. The new hardscape surfaces: a parking lot, and building pad around the building and

restroom will be located in the southern portion of the site, and any stormwater runoff will be allowed to percolate into the soils. No additional surface flow will be allowed to drain into the Coyote Creek Channel. Finally, the existing Coyote Creek channel will not be altered as part of the proposed project's implementation.

Comment 4.

Currently a bikeway along Coyote Creek Channel, including this location, is under consideration through the Bicycle Capital Improvement Program. As a part of the Orange County (OC) Loop project, the County is working with the Orange County Transportation Authority (OCTA) to plan and design the 66-mile bikeway Loop. Please be notified that the City's proposed project would be affected by any future channel improvement and new bikeways 12,000.

Response 4.

The comment is noted for the record, please see response #3.

Comment 5.

All work within or adjacent to any OCFCD right-of-way or flood control facilities shall be conducted so as not to adversely impact channel's structural integrity, hydraulic flow conditions, access and maintainability. Furthermore, all proposed projects within OCFCD right-of-way should be reviewed and approved by OC Public Works, and the work should be conducted only after an encroachment permit has been obtained. Technical reviews and approvals for the proposed work will be accomplished within the permit process.

If you have any questions regarding these comments, please contact Matt Tucker at (714) 955- 0669 in North OC Watershed Management Area, Penny Lew at (714) 647-3990 or Sahar Parsi at (714) 647-3988 in OC Infrastructure or Cindy Salazar at (714) 667-8870 in OC Development Services.

Response 5.

Comments are noted for the record. As stated previously, the park project will not involve any alteration to the existing Coyote Creek flood control channel.



July 15, 2019

NCL-19-024

Chris Schaefer, Senior Planner
City of La Habra
Department of Community Development
110 East La Habra Boulevard
La Habra, California, 90631

Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for the Vista Grande Park Improvement Project

Dear Chris Schaefer,

Thank you for the opportunity to comment on the Notice of Intent to Adopt a Mitigated Negative Declaration for the Vista Grande Park Improvement Project. The County of Orange offers the following comments for your consideration.

OC North Orange County Watershed Management Area

1. The discussion on hydrology and water quality (Section 3.10, page 80) should clarify whether or not the project qualifies as a *Priority Development Project* under the city's municipal stormwater permit (Board Order R8-2009-0030), thereby requiring preparation of a *Project Water Quality Management Plan (WQMP)*, or is instead a *Non-Priority Project*, which would require preparation of a *Non-Priority Water Quality Project Plan*. The document references the need for a mandatory WQMP without this context.

OC Infrastructure Programs/Flood Programs/Hydrology

1. Please be advised that the Coyote Creek Channel (Facility No. A01) contains deficient reaches that are not capable of conveying runoff from the 100-year storm event. Therefore, any increase in runoff (if any) should be appropriately mitigated to ensure existing conditions are not made worse as a result of the project.
2. Currently a bikeway along Coyote Creek Channel, including this location, is under consideration through the Bicycle Capital Improvement Program. As a part of the Orange County (OC) Loop project, the County is working with the Orange County Transportation Authority (OCTA) to plan and design the 66-mile bikeway Loop. Please be notified that the City's proposed project would be affected by any future channel improvement and new bikeways.

300 N. Flower Street, Santa Ana, CA 92703
P.O. Box 4048, Santa Ana, CA 92702-4048

www.ocpublicworks.com
714.667.8800 | info@OCPW.ocgov.com

3. All work within or adjacent to any OCFCD right-of-way or flood control facilities shall be conducted so as not to adversely impact channel's structural integrity, hydraulic flow conditions, access and maintainability. Furthermore, all proposed projects within OCFCD right-of-way should be reviewed and approved by OC Public Works, and the work should be conducted only after an encroachment permit has been obtained. For information regarding the permit application process and other details please refer to the Encroachment Permits Section link on OC Public Works website at http://www.ocpublicworks.com/ds/permits/encroachment_permits. Technical reviews and approvals for the proposed work will be accomplished within the permit process.

If you have any questions regarding these comments, please contact Matt Tucker at (714) 955-0669 in North OC Watershed Management Area, Penny Lew at (714) 647-3990 or Sahar Parsi at (714) 647-3988 in OC Infrastructure or Cindy Salazar at (714) 667-8870 in OC Development Services.

Sincerely,

for 
Richard Vuong, Manager, Planning Division
OC Public Works Service Area/OC Development Services
300 North Flower Street
Santa Ana, California 92702-4048
Richard.Vuong@ocpw.ocgov.com

cc: Matt Tucker, North OC Watershed Management Area
Sahar Parsi, OC Flood Programs/Hydrology & Floodplain Management
Penny Lew, OC Flood Programs/Hydrology & Floodplain Management

300 N. Flower Street, Santa Ana, CA 92703
P.O. Box 4048, Santa Ana, CA 92702-4048

www.ocpublicworks.com
714.667.8800 | Info@OCPW.ocgov.com

Response to Comment Letter Dated July 08, 2019

Michael Awad

Resident

1048 Las Lomas Dr. #B.

La Habra CA 90631

Comment 1.

This is Michael Awad, living at: 1048 Las Lomas Dr. #B, La Habra CA 90631. I'm writing a comment regarding VISTA GRAND PARK improvement and I'm clarifying my opinion for a great project. We, as a household, were waiting to get it done, my wife and I we chose Alternative B better than A because, our concern for the soccer field is that it will be noisy and I think it will annoy us a lot. Since I moved here we like this area because it's quiet and nice. So we will appreciate it if Alternative B is chosen.

Response 1.

The comment has been noted for the record.

subject: comment for improvement existing 17.5- acre park
project name: Vista Grand Park

Dear Chris Schaefer

this is Michael Awad ,one of living at :1048 Las Lomas dr #B, La Habra CA.90631

I'm writing a comment regarding VISTA GRAND PARK improvement and I'm clarify my opinion for great project we was waiting to get it done as household, my wife and I we choose Alternative B better than A according the soccer Field for only one concern ,it will be noisy and i think it will annoy us a lot , since i moved here we like the area Because it's quiet and nice no noise
So we will be appreciate if it will be Alternative B better
thank you
Michael Awad



Response to Comment Letter Dated July 11, 2019

Ayman Matta, Mariam Matta

Residents

1501 West Lambert Road

La Habra CA 90631

Comment 1.

Dear Chris Schaefer

This is Ayman Matta, living at: 1501 W. Lambert Rd, La Habra CA 90631 I'm writing a comment regarding VISTA GRAND PARK improvement and I'm clarifying my opinion for a great project. We, as a household, were waiting to get it done, my wife and I we chose Alternative B better than A because, our concern for the soccer field is that it will be noisy and I think it will annoy us a lot. Since I moved here we like this area because it's quiet and nice. So we will appreciate it if Alternative B is chosen.

Response 1.

The comment has been noted for the record.

subject: comment for improvement existing 17.5- acre park
project name: Vista Grand Park

Dear Chris Schaefer

this is Ayman Matta ,one of living at 1501 w Lambert rd,la habra ca 90631

I'm writing a comment regarding VISTA GRAND PARK improvement and I'm clarify my opinion for great project we was waiting to get it done as household, my wife and I we choose Alternative B better than A according the soccer Field for only one concern ,it will be noisy and i think it will annoy us a lot , since i moved here we like the area Because it's quiet and nice no noise
So we will be appreciate if it will be Alternative B better
thank you
Ayman Matta
Mariam Matta



Response to Comment Letter Dated July 12, 2019

Kathryn Cross, REHS, Supervising Hazardous Materials Specialist

Solid Waste Local Enforcement Agency

Environmental Health

1241 E. Dyer Road, Suite 120

Santa Ana, CA 92705

Comment 1.

The Orange County Health Care Agency Environmental Health Division is the Solid Waste Local Enforcement Agency (LEA) for all cities and unincorporated areas of Orange County. Pursuant to the Public Resources Code (PRC) and the California Code of Regulations (CCR), Title 14 and 27, the LEA inspects and enforces the State solid waste laws and regulations at closed landfills such as the Former La Habra Landfill also known as the Vista Grande Park. The Mitigated Negative Declaration (MND) and Initial Study dated June 18, 2019 documents our required review and approval of post closure land development. The LEA has the following comments and corrections:

Response 1.

The comment has been noted for the record.

Comment 2.

On Page 40 of the MND, an Excavation Management Plan is discussed as required by SCAQMD Rule 1150. Title 27 CCR, Section 21190 (c) and (d), and requires both the Regional Water Quality Control Board and LEA to review and approve any excavation of the landfill or change/modification to the final cover.

Response 2.

The comment has been noted for the record. As noted herein in Section 2, this additional information has been incorporated into the Initial Study and administrative record by reference.

Comment 3.

Starting on Page 41 methane emission is discussed as an SCAQMD issue. Methane emission into the air is an SCAQMD issue, however, subsurface methane mitigation, monitoring, and control are an LEA issue, and thus the LEA requirements in Title 27 for methane mitigation, monitoring and control must be followed, including modification to the gas collection system or the probes/wells.

Response 3.

The comment is noted for the record. This additional information has been incorporated into the Initial Study and administrative record by reference. Please refer to Section 2 of this Comments and Response to Comments document.

Comment 4

As mentioned on Page 42, under the Section 3.3.2 Analysis of Environmental Impacts, the LEA conducts quarterly inspections of the former landfill and reviews the methane compliance probe monitoring reports for the landfill. These probes and the extraction wells that exist at the site must be protected during construction activities and any damaged probes or wells must be replaced with LEA approval. This is mentioned in Section 3.9.2 but does not mention LEA approval or contacting LEA if damage occurs.

Response 4

This additional information has been incorporated into the Initial Study and administrative record by reference. Please refer to Section 2 of this Comments and Response to Comments document.

Comment 5

On Page 42 and 46, under the Section 3.3.2 Analysis of Environmental Impacts, "The contractors will be required to obtain all necessary SCAQMD permits related to the installation and/or modification of existing onsite methane monitors". Any installation or modification to the LPG collection/control system including probes or extraction wells must receive LEA approval and meet the requirements of Title 27 CCR.

Response 5

This additional information has been incorporated into the Initial Study and administrative record by reference. Please refer to Section 2 of this Comments and Response to Comments document. The final ISMND will indicate that any installation or modification to the LPG collection/control system including probes or extraction wells must receive LEA approval and meet the requirements of Title 27 CCR.

Comment 6

On Page 76, under the Section 3.9.2 Analysis of Environmental Impacts; Page 135, Mitigation Measure No. 9; Table 4.1, Mitigation Monitoring Program, Mitigation Measure No. 9 "All new building construction must be designed with proper ventilation to prevent an accumulation of methane gas". Title 27 CC Section 21190 must be followed regarding buildings and structures.

Response 6

This additional information has been incorporated into the Initial Study and administrative record by reference. Please refer to Section 2 of this Comments and Response to Comments document. Mitigation Measure No. 9 will be expanded to include the reference to Title 27 CC Section 21190 must be followed regarding buildings and structures.

Comment 7

Table 4.1, Mitigation Monitoring Program, Mitigation Measure No. 5, contractors must obtain approval from the LEA to install or modify the existing onsite methane monitors and they must meet the requirements of Title 27 CCR.

Response 7

This additional information has been incorporated into the Initial Study and administrative record by reference. Please refer to Section 2 of this Comments and Response to Comments document. Mitigation Measure No. 5 will be amended to state that “contractors must obtain approval from the LEA to install or modify the existing onsite methane monitors and they must meet the requirements of Title 27 CCR.”



**REGULATORY/MEDICAL HEALTH SERVICES
ENVIRONMENTAL HEALTH**

RICHARD SANCHEZ
DIRECTOR

STEVE THRONSON
DEPUTY AGENCY DIRECTOR
REGULATORY/MEDICAL SERVICES

CHRISTINE LANE, REHS
INTERIM DIRECTOR
ENVIRONMENTAL HEALTH

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E-MAIL: ehealth@ochoa.com



July 12, 2019

City of La Habra
Chris Schaefer
Senior Planner
110 East La Habra Boulevard
La Habra, California 90631

Subject: Vista Grande Park Improvement Project, Mitigated Negative Declaration and Initial Study dated June 18, 2019

Dear Mr. Schaefer:

The Orange County Health Care Agency Environmental Health Division is the Solid Waste Local Enforcement Agency (LEA) for all cities and unincorporated areas of Orange County. Pursuant to the Public Resources Code (PRC) and the California Code of Regulations (CCR), Title 14 and 27, the LEA inspects and enforces the State solid waste laws and regulations at closed landfills such as the Former La Habra Landfill also known as the Vista Grande Park. The Mitigated Negative Declaration (MND) and Initial Study dated June 18, 2019 documents our required review and approval of post closure land development. The LEA has the following comments and corrections:

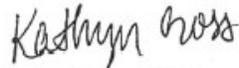
1. On Page 40 of the MND, an Excavation Management Plan is discussed as required by SCAQMD Rule 1150. Title 27 CCR, Section 21190 (c) and (d), and requires both the Regional Water Quality Control Board and LEA to review and approve any excavation of the landfill or change/modification to the final cover.
2. Starting on Page 41, methane emission is discussed as an SCAQMD issue. Methane emission into the air is an SCAQMD issue, however, subsurface methane mitigation, monitoring, and control are an LEA issue, and thus the LEA requirements in Title 27 for methane mitigation, monitoring and control must be followed, including modification to the gas collection system or the probes/wells.
3. As mentioned on Page 42, under the Section 3.3.2 Analysis of Environmental Impacts, the LEA conducts quarterly inspections of the former landfill and reviews the methane compliance probe monitoring reports for the landfill. These probes and the extraction wells that exist at the site must be protected during construction activities and any damaged probes or wells must be replaced with LEA approval. This is mentioned in Section 3.9.2 but does not mention LEA approval or contacting LEA if damage occurs.

Chris Schaefer, City of La Habra
July 12, 2019
Page 2

4. On Page 42 and 46, under the Section 3.3.2 Analysis of Environmental Impacts, “The contractors will be required to obtain all necessary SCAQMD permits related to the installation and/or modification of existing onsite methane monitors”. Any installation or modification to the LFG collection/control system including probes or extraction wells must receive LEA approval and meet the requirements of Title 27 CCR.
5. On Page 76, under the Section 3.9.2 Analysis of Environmental Impacts; Page 135, Mitigation Measure No. 9; Table 4.1, Mitigation Monitoring Program, Mitigation Measure No. 9 “All new building construction must be designed with proper ventilation to prevent an accumulation of methane gas”. Title 27 CCR, Section 21190 must be followed regarding buildings and structures.
6. Table 4.1, Mitigation Monitoring Program, Mitigation Measure No. 5, contractors must obtain approval from the LEA to install or modify the existing onsite methane monitors and they must meet the requirements of Title 27 CCR.

Thank you for giving us an opportunity to comment on this environmental document. If you have any questions or concerns regarding this letter, you may contact me at (714) 433-6270 or Kevin Lambert at (714) 433-6272.

Sincerely,



Kathryn Cross, REHS
Supervising Hazardous Materials Specialist
Solid Waste Local Enforcement Agency
Environmental Health

cc: Michael Peck, OC Development Services
John Arnau, OC Waste & Recycling
CalRecycle LEA Portal

Response to Comment Letter Dated July 9, 2019

Dan Phu, Manager Environmental Programs

Orange County Transportation Authority

550 South Main St.

Orange, CA 92863-1584

Comment 1.

Thank you for providing the Orange County Transportation Authority (OCTA) with the Mitigated Negative Declaration for the Vista Grande Park Improvement Project (Project). The following active transportation comments are provided for your consideration:

Response 1.

The comment has been noted for the record.

Comment 2.

OCTA coordinated with local jurisdictions and community members to develop regional bikeway corridors. The Fourth District Bikeways Strategy (February 2012) identified the Brookhurst-Gilbert Corridor as a regional bikeway corridor adjacent to the Project site. OCTA recommends the proposed Project consider opportunities to support enhanced local and regional bikeways in the Project area.

Response 2.

The comment has been noted for the record. The City of La Habra will coordinate any subsequent phase of park planning and design with OCTA.

Comment 3.

OCTA recommends the Project considers the potential implementation of a local bikeway along Coyote Creek, as identified on Figure 4-1 of the City of La Habra Bikeway Master Plan (July 26, 2017). The implementation of a bikeway along Coyote Creek may help further the OC Loop gap closure between the Union Pacific Railroad and the existing bikeway along Coyote Creek, which currently terminates at Imperial Highway. Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Response 3.

The Coyote Creek area is not included within the park boundaries. However, the proposed park does not preclude the installation of the bike trail along Coyote Creek. In fact the City is committed to such a trail as part of the Citywide Bicycle Master Plan.



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July 9, 2019

Mr. Chris Schaefer
Senior Planner
City of La Habra
110 East La Habra Boulevard
La Habra, CA 90631

Subject: Vista Grande Park Improvement Project Mitigated Negative Declaration

Dear Mr. Schaefer:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Mitigated Negative Declaration for the Vista Grande Park Improvement Project (Project). The following active transportation comments are provided for your consideration:

- OCTA coordinated with local jurisdictions and community members to develop regional bikeway corridors. The Fourth District Bikeways Strategy (February 2012) identified the Brookhurst-Gilbert Corridor as a regional bikeway corridor adjacent to the Project site. OCTA recommends the proposed Project consider opportunities to support enhanced local and regional bikeways in the Project area. Please refer to the following link for the Fourth District Bikeways Strategy:
<http://octa.net/pdf/4thDistrictBikewaysReport.pdf>
- OCTA recommends the Project considers the potential implementation of a local bikeway along Coyote Creek, as identified on Figure 4-1 of the City of La Habra Bikeway Master Plan (July 26, 2017). The implementation of a bikeway along Coyote Creek may help further the OC Loop gap closure between the Union Pacific Railroad and the existing bikeway along Coyote Creek, which currently terminates at Imperial Highway.

Mr. Chris Schaefer
July 9, 2019
Page 2

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,

A handwritten signature in blue ink that reads "Dan Phu" followed by a flourish.

Dan Phu
Manager, Environmental Programs

Response to Comment Letter Dated July 5, 2019

Noah Zeko

Resident

La Habra CA 90631

Comment 1.

As a local resident, I've been sent plans for the Vista Grande Park renovation, which is very exciting as it's close to my home. That park, and I use that term lightly, is in desperate need of a loving remodeling, and it's wonderful that the city is allotting money for beautification and betterment through the local parks. I noticed there are two plans, an active and a passive. Considering the sloping topography, the distance from the local schools, and the location on a busy street, if I may humbly suggest as a member of the community, a passive park would service the community better. The passive option appears to allow for basketball and volleyball, satisfying the need for athletic activity if desired, and the option leaves room for families to gather, relax, and frolic in the open space of the park center, one of the noticeably great features prominent parks universally share around the western world. I hope you consider this comment as plans move forward with the development of the city. I trust you had a great Independence Day, and I wish you a blessed summer.

Response 1.

The comment has been noted for the record.

Chris Schaefer

From: Noah Zeko <noahzeko@gmail.com>
Sent: Friday, July 05, 2019 5:34 PM
To: Chris Schaefer
Subject: Community Vista Grande Park Project



Hello, Mr. Schaefer,

As a local resident, I've been sent plans for the Vista Grande Park renovation, which is very exciting as it's close to my home. That park, and I use that term lightly, is in desperate need of a loving remodeling, and it's wonderful that the city is allotting money for beatification and betterment through the local parks. I noticed there are two plans, an active and a passive. Considering the sloping topography, the distance from the local schools, and the location on a busy street, if I may humbly suggest as a member of the community, a passive park would service the community better. The passive option appears to allow for basketball and volleyball, satisfying the need for athletic activity if desired, and the option leaves room for families to gather, relax, and frolic in the open space of the park center, one of the noticeably great features prominent parks universally share around the western world. I hope you consider this comment as plans move forward with the development of the city. I trust you had a great Independence Day, and I wish you a blessed summer.

Best wishes,
Noah Zeko

Response to Comment Letter Dated July 16, 2019

Mike Campisi, Pipeline Planning Assistant

SoCalGas Transmission Technical Services

9400 Oakdale Avenue

Chatsworth, California 91311

Comment 1

The Transportation Department of SoCalGas does not operate any facilities within your proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within your project scope. To assure no conflict with the Distribution's pipeline system, please email them at: AtlasRequest/willserveanaheim@semprautilities.com.

Response 1

The comment is noted for the record.



Mike Campisi
Pipeline Planning Assistant

9400 Oakdale Ave
Chatsworth, CA 91311

Tel: 213-231-6081

July 16, 2019

Chris Schaefer
City of La Habra
CSchaefer@lahabraca.gov

Subject: Vista Grande Park Improvement Project

DCF: 1429-19NC

The Transmission Department of SoCalGas does not operate any facilities within your proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within your project scope.

To assure no conflict with the Distribution's pipeline system, please e-mail them at:

AtlasRequests/WillServeAnaheim@semprautilities.com

Sincerely,

Mike Campisi
Pipeline Planning Assistant
SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com

July 16, 2019

1 of 1

2. REVISIONS TO THE IS/MND BY REFERENCE

This section indicates those revisions that were requested by those individuals and agencies that commented on the Initial Study and Mitigated Negative Declaration that was circulation for public review. First the Agency or individual is identified along with the written comment(s) requesting the revision. The specific change or revision that prepared in response to the comment is then identified immediately below the comment. The changes and/or revisions outlined in this section will be made part of the administrative record as part of the project's approval and the adoption of Mitigated Negative Declaration and the Mitigation Monitoring and Reporting Program. The original comment is identified and is shown in *italics*. The Lead Agency's revisions to the Initial Study are then noted immediately below the original comment.

Response to Comment Letter Dated July 17, 2019

Scott Shelley, California Department of Transportation, District 12

Revision to IS/MND in Response to Comment 5.

Please consider analyzing impacts to the City's existing and proposed bicycle facilities. The project is surrounded by existing bicycle facilities, and a proposed bicycle facility runs directly through the site. The park is also considered a "key destination" in the City of La Habra's Bikeway Master Plan (2017). Thus, the project site is an important part of the City's bicycle network. According to the Bikeway Master Plan, there are existing bicycle facilities on:

- *Lambert Road, Class II bicycle lanes;*
- *Idaho Street, Class III bicycle route; and*
- *Las Lomas Drive, Class III bicycle route.*
- *There are proposed facilities on: Monte Visto Street, Class III bicycle route; and Coyote Creek Channel, Class I bicycle path (runs directly through project site).*

Additionally, a proposed section of the OC Loop is located approximately 0.4 miles north of the project site. Please consider incorporating this into the project analysis, as visitors of Vista Grande Park may utilize the OC Loop, a regionally significant Class I trail.

The following information will be added under Section 3.17.2.A.

“According to the Bikeway Master Plan, there are existing bicycle facilities on:

- Lambert Road, Class II bicycle lanes;
- Idaho Street, Class III bicycle route; and
- Las Lomas Drive, Class III bicycle route.
- There are proposed facilities on: Monte Visto Street, Class III bicycle route; and Coyote Creek Channel, Class I bicycle path (runs directly through project site).

Additionally, a proposed section of the OC Loop is located approximately 0.4 miles north of the project site.”

Response to Comment Letter Dated July 15, 2019

Richard Vuong, OC Public Works Service Area / OC Development Services

Revision to IS/MND in Response to Comment 2.

The discussion on hydrology and water quality (Section 3.10, page 80) should clarify whether or not the project qualifies as a “Priority Development Project” under the city’s municipal stormwater permit (Board Order R8-2009-0030), thereby requiring preparation of a “Project Water Quality Management Plan” (WQMP), or is instead a “Non-Priority Project”, which would require preparation of a “Non Priority Water Quality Project Plan.” The document references the need for a mandatory WQMP without this context.

The following information will be added under Section 3.10.2.B

“The project qualifies as a *Priority Development Project* under the City of La Habra municipal stormwater permit (Board Order R8-2009-0030), thereby requiring the preparation of a Project Water Quality Management Plan” (WQMP). In the event the project is determined to be, a *Non-Priority Project*, the preparation of a Non Priority Water Quality Project Plan would be required.”

Response to Comment Letter Dated July 12, 2019

Kathryn Cross, Solid Waste Local Enforcement Agency, Environmental Health

Revision to IS/MND in Response to Comment 2.

On Page 40 of the MND, an Excavation Management Plan is discussed as required by SCAQMD Rule 1150. Title 27 CCR, Section 21190 (c) and (d), and requires both the Regional Water Quality Control Board and LEA to review and approve any excavation of the landfill or change/modification to the final cover.

The following information will be added under Section 3.3.2.B, pages 40 and 41.

“Title 27 CCR, Section 21190 (c) and (d), requires both the Regional Water Quality Control Board and LEA to review and approve any excavation of the landfill or change/modification to the final cover.”

Revision to IS/MND in Response to Comment 3.

Starting on Page 41 methane emission is discussed as an SCAQMD issue. Methane emission into the air is an SCAQMD issue, however, subsurface methane mitigation, monitoring, and control are an LEA issue, and thus the LEA requirements in Title 27 for methane mitigation, monitoring and control must be followed, including modification to the gas collection system or the probes/wells.

The following information will be added under Section 3.3.2.B, page 41 at the end of Subsection B.

“In addition to the SCAQMD’s Rules and Regulations, however, subsurface methane mitigation, monitoring, and control are also an LEA issue. As a result, the LEA requirements contained in Title 27 for methane mitigation, monitoring and control must be followed, including modification to the gas collection system or the probes/wells.”

Revision to IS/MND in Response to Comment 4

As mentioned on Page 42, under the Section 3.3.2 Analysis of Environmental Impacts, the LEA conducts quarterly inspections of the former landfill and reviews the methane compliance probe monitoring reports for the landfill. These probes and the extraction wells that exist at the site must be protected during construction activities and any damaged probes or wells must be replaced with LEA approval. This is mentioned in Section 3.9.2 but does not mention LEA approval or contacting LEA if damage occurs.

The following information will be added under Section 3.9.2.B, page 75.

“The LEA also conducts quarterly inspections of the former landfill and reviews the methane compliance probe monitoring reports for the landfill. These probes and the extraction wells must be protected during construction activities and any damaged probes or wells must be replaced with the approval of the LEA.”

Revision to IS/MND in Response to Comment 5

On Page 42 and 46, under the Section 3.3.2 Analysis of Environmental Impacts, "The contractors will be required to obtain all necessary SCAQMD permits related to the installation and/or modification of existing onsite methane monitors". Any installation or modification to the LPG collection/control system including probes or extraction wells must receive LEA approval and meet the requirements of Title 27 CCR.

The following information (the new required text is underlined) will be added under Section 3.3.3.B, pages 42 and 46 “Mitigation Measure No. 5.” The same revision to the mitigation measure must be made to Table 4-1 (Mitigation Monitoring Program).

The following mitigation will be applicable to the installation and/or maintenance of the methane monitoring wells:

- The contractors will be required to obtain all necessary SCAQMD permits related to the installation and/or modification of the existing on-site methane monitors located within the park. Evidence of the Contractor obtaining the necessary SCAQMD permit must be provided to the City of La Habra. Any installation or modification to the LPG collection/control system including probes or extraction wells must receive LEA approval and meet the requirements of Title 27 CCR.

And

Mitigation Measure No. 5 (Air Quality). The contractors will be required to obtain all necessary SCAQMD permits related to the installation and/or modification of the existing on-site methane monitors located within the park. Evidence of the Contractor obtaining the necessary SCAQMD permit must be provided to the City of La Habra. Any installation or modification to the LPG collection/control system including probes or extraction wells must receive LEA approval and meet the requirements of Title 27 CCR.

Revision to IS/MND in Response to Comment 6

On Page 76, under the Section 3.9.2 Analysis of Environmental Impacts; Page 135, Mitigation Measure No. 9; Table 4.1, Mitigation Monitoring Program, Mitigation Measure No. 9 "All new building construction must be designed with proper ventilation to prevent an accumulation of methane gas". Title 27 CC Section 21190 must be followed regarding buildings and structures.

The following information (the new required text is underlined) will be added under Section 3.9.2 to Mitigation Measure No. 9 and to the same measure identified in Table 4-1 (Mitigation Monitoring Program).

- The existing methane monitoring wells must be maintained during and following construction activities. All new building construction (storage sheds, restrooms, etc.) must be designed with proper ventilation to prevent an accumulation of methane gas. All new building construction must be designed with proper ventilation to prevent an accumulation of methane gas". Title 27 CC Section 21190 must be followed regarding buildings and structures.

And

Mitigation Measure No. 9 (Hazardous Materials). The existing methane monitoring wells must be maintained during and following construction activities. All new building construction (storage sheds, restrooms, etc.) must be designed with proper ventilation to prevent an accumulation of methane gas. All new building construction must be designed with proper ventilation to prevent an accumulation of methane gas". Title 27 CC Section 21190 must be followed regarding buildings and structures.

Revision to IS/MND in Response to Comment 7

Table 4.1, Mitigation Monitoring Program, Mitigation Measure No. 5, contractors must obtain approval from the LEA to install or modify the existing onsite methane monitors and they must meet the requirements of Title 27 CCR.

The following information will be added to Table 4, under Mitigation Measure No. 5.

“Contractors must obtain approval from the LEA to install or modify the existing onsite methane monitors and they must meet the requirements of Title 27 CCR.”