

# COMMENTS AND RESPONSES TO COMMENTS INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

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**THE RICHMAN GROUP  
LAKELAND ROAD HOUSING DEVELOPMENT  
13231 LAKELAND ROAD  
SANTA FE SPRINGS, CALIFORNIA**



**LEAD AGENCY:**

**CITY OF SANTA FE SPRINGS  
COMMUNITY DEVELOPMENT DEPARTMENT  
11710 E. TELEGRAPH ROAD  
SANTA FE SPRINGS, CALIFORNIA 90670**

**REPORT PREPARED BY:**

**BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING  
2211 S. HACIENDA BOULEVARD, SUITE 107  
HACIENDA HEIGHTS, CALIFORNIA 92240**

**NOVEMBER 30, 2021**

SFSP 067

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## SECTION 1. INTRODUCTION

The City of Santa Fe Springs, in its capacity as Lead Agency, is considering an application for the construction of a new 139-unit housing development located near the intersection of Lakeland Road and Laurel Avenue. Of this total number of units, 121 units would consist of one, two, and three-bedroom rental units and 18 units would be three level owner-occupied townhome units. The proposed project would include the development of a total of four adjacent parcels, all with a Multiple-Family Residential-Planned Unit Development (R3-PD) designation. The applicable parcel numbers included in the project development include 8011-012-902 (Parcel 1), 8011-011-912 (Parcel 2), 8011-011-906 (Parcel 3), and 8011-011-907 (Parcel 4). The total land area to be developed as part of the proposed project's implementation is 4.68 acres (203,761 square feet).<sup>1</sup>

The City of Santa Fe Springs is the designated *Lead Agency* and as such, the City will be responsible for the project's environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.<sup>2</sup> As part of the proposed project's environmental review, the City of Santa Fe Springs has authorized the preparation of an Initial Study and Mitigated Negative Declaration.<sup>3</sup> These documents were circulated for public review as required pursuant to CEQA. Following the review period, written comments were received from the following:

- County of Los Angeles Fire Department;
- Los Angeles County Public Works Department;
- Gabrieleno Band of Mission Indians - Kizh Nation; and,
- Los Angeles County Sanitation Districts.

Section 2 includes the comments that were received and point-by-point responses to those comment. Several comments requested that clarifications be made or errors be corrected to the original document. These revisions are noted in Section 3. None of the changes altered the conclusions of the original environmental document. Please note that copies of the original letters are included at the end of this Response-to-Comments report.

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<sup>1</sup> Email from Mr. Rich Westberg, Executive Vice President, The Richmond Group of California. Personal Email May 12, 2020.

<sup>2</sup> California, State of. *California Public Resources Code, Division 13, Chapter 2.5, Definitions*. as Amended 2018. §21067. 2019

<sup>3</sup> California, State of. *California Public Resources Code, Division 13, Guidelines for the Implementation of the California Environmental Quality Act*. §15050. 2019

## SECTION 2. COMMENTS AND RESPONSE TO COMMENTS

### 1. COUNTY OF LOS ANGELES FIRE DEPARTMENT

#### Comment 1.1

*Planning Division.* The subject property is entirely within the City of Santa Fe Springs, which is not a part of the emergency response area of the County of Los Angeles Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department. For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or [Kien.Chin@fire.lacounty.gov](mailto:Kien.Chin@fire.lacounty.gov).

#### Response 1.1

The comment is noted for the record. No response is required.

#### Comment 1.2

*Land Development Unit.* This project is located entirely in the City of Santa Fe Springs. Therefore, the City of Santa Fe Springs Fire Department has the jurisdiction concerning this project and will be setting conditions. This project is in close proximity to the jurisdictional area of County of Los Angeles Fire Department; however, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the County of Los Angeles Fire Department. For any questions regarding the report, please contact Inspector Claudia Soiza at (323) 890-4243 or [Claudia.soiza@fire.lacounty.gov](mailto:Claudia.soiza@fire.lacounty.gov).

#### Response 1.2

The comment is noted for the record. No response is required.

#### Comment 1.3

*Forestry Division.* The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed. Under the Los Angeles County Oak Tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage, or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade. If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site. The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project. For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

#### Response 1.3

The comment is noted for the record. No response is required.

**Comment 1.4**

*The Health Hazardous Materials Division.* The Health Hazardous Materials Division of the Los Angeles County Fire Department has no jurisdiction in the City of [Santa Fe] Springs. Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or [Perla.garcia@fire.lacounty.gov](mailto:Perla.garcia@fire.lacounty.gov) if you have any questions. If you have any additional questions, please contact this office at (323) 890-4330.

**Response 1.4**

The comment is noted for the record. No response is required.

**2. LOS ANGELES COUNTY PUBLIC WORKS**

**Comment 2.1**

The proposed project proposes the construction of 121 rental units and 18 owner-occupied townhome condominium units located near the intersection of Lakeland Road and Laurel Avenue. We have the following comment for your consideration.

**Response 2.1**

The comment is noted for the record. No response is required.

**Comment 2.2**

Page 107 responds to Chapter 3.19 Utilities, D, about water supply impacts although the question is about impacts to solid waste capacity, standards and reduction goals. The response for E under the same section addresses both the impacts to solid waste capacity, standards and reduction goals, as well as negative impacts on solid waste services and reduction goals. Therefore, the responses to D and E should be revised accordingly. If you have any question regarding this comment, please contact Nilda Gemeniano at 626-458-5184 or [ngemenia@pw.lacounty.gov](mailto:ngemenia@pw.lacounty.gov).

**Response 2.2**

Please refer to Section 3 for the correct format for Subsections D and E, on Page 107.

**Comment 2.3**

The cumulative traffic generated by the project in the area may significantly impact the County's intersections. The traffic finding in the IS/MND cannot be substantiated by Public Works until a traffic impact analysis is submitted to Public Works for review and approval. All traffic impacts and required mitigations for any impacted county's intersection should be identified and included in the environmental documents. If you have any question regarding this comment, please contact Stephan Lamm at 626-300-4764 or [slamm@pw.lacounty.gov](mailto:slamm@pw.lacounty.gov).

### **Response 2.3**

The comment indicates that a traffic impact analysis is needed. The project's trip generation was estimated using trip generation rates derived from the Institute of Transportation Engineer's (ITE) 10<sup>th</sup> Edition Trip Generation Handbook. The project's daily trips are presented in Table 3-4 of the IS/MND. As shown in Table 3-4 included in the IS/MND, the project is anticipated to generate approximately 756 trips per day, with 50 trips occurring during the morning (AM) peak hour and 61 trips occurring during the evening (PM) peak hour. In terms of vehicle miles traveled, the proposed project is an infill development that will provide much-needed new housing for a job-rich, housing-poor community. According to the most recent SCAG RTP estimates, Los Angeles County as a whole had a jobs/housing balance of 0.63 compared to a jobs/housing balance of 0.40 for the City. The new housing development would enable future employees to live in the city, rather than to commute to the City from more distant locations, thus reducing the overall vehicle miles traveled.

The nearest CMP-designated intersection to the project site is Imperial Highway/Carmenita Road. This intersection will not experience more than 50 peak hour trips at a freeway intersection. As indicated previously, the proposed project is anticipated to generate approximately 50 AM peak hour trips and 61 PM peak hour trips throughout the local roadway network. As a result of the projected traffic conditions, no impacts on CMP arterial roadways or intersections are anticipated.

### **3. GABRIELENO BAND OF MISSION INDIANS – KIZH NATION**

#### **Comment 3.1**

We have received your Notice of the Adopt Mitigative Negative Declaration for the Richman Group Lakeland Road Housing development Project. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

#### **Response 3.1**

The consultation has been completed as is required pursuant to CEQA. The City did initiate the requisite AB-52 consultation. As part of the AB-52 requirements, the Gabrielino-Kizh responded and indicated that the project area is located within the Tribe's ancestral territory. The Tribe considered the area to be sensitive for cultural resources, and requested the following mitigation measure be incorporated into the IS/MND and the MMRP:

- Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a Native American Monitor approved by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill A52 (the "Tribe" or the "Consulting Tribe"). A copy of the executed contract shall be submitted to the City of Santa Fe Springs Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any

cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the project site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the project site have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the project site, all ground disturbance shall immediately cease, and the County Coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource,” time allotment and funding sufficient to allow or implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

#### **4. LOS ANGELES COUNTY SANITATION DISTRICTS**

##### **Comment 4.1**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the subject project on October 4, 2021. The proposed project is located within the jurisdictional boundaries of District No. 18.

##### **Response 4.1**

The comment is noted for the record. No response is required.

##### **Comment 4.2**

*Section 3.19 Utilities, Analysis of Environmental Impacts, Response to Question E, Page 107:* The information stated that “The Puente Hills Landfill...is only currently accepting clean dirt. The Sanitation Districts continue to maintain environmental control systems at the other closed landfills, which include the Spadra, Palos Verdes, and Mission Canyon landfills.” However, since the Puente Hills Landfill is

closed, it is not accepting any dirt from the public and its environmental control systems are also maintained by the District.

**Response 4.2**

Please refer to Section 3 for the correction for Subsection 3.19.E.

**Comment 4.3**

*Section 3.19 Utilities, Analysis of Environmental Impacts, Response to Question E, Page 107:* The information stated that “Operational waste that cannot be recycled or taken to area landfills will be transported to the Commerce incinerator.” However, the Commerce Refuse-to-Energy Facility was closed in June 2018 and does not accept any waste.

**Response 4.3**

Please refer to Section 3 for the correction for Subsection 3.19.E.

**Comment 4.4**

The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the District’s for conveyance to the Districts South Whittier Outfall Trunk Sections 1, 2, 3, and 4, located in Carmenita Road at Imperial Highway. The Districts, 33-inch diameter trunk sewer has a capacity of 25.7 million gallons per day (mgd) and conveyed a peak flow of 13.6 (mgd) when last measured in 2019.

**Response 4.4**

Please refer to Section 3 for the correction for this Subsection.

**Comment 4.5**

The wastewater generated by the proposed project will be treated at the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a capacity of 37.5 (mgd) and currently processes an average flow of 23.1 (mgd).

**Response 4.5**

Please refer to Section 3 for the correction for this Subsection.

**Comment 4.6.**

The expected average wastewater flow from the project site, described in the MND as a 139-unit housing development, is 21,684 gallons per day. For a copy of the Districts’ average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link.



**Response 4.6**

The analysis used the correct loading factor (156 gallons per day) cited in the comment.

**Comment 4.7**

The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

**Response 4.7**

The comment is noted for the record. No response is required.

**Comment 4.8**

In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the District's intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743 or at [mandyhuffman@lacsd.org](mailto:mandyhuffman@lacsd.org).

**Response 4.8**

The comment is noted for the record. No response is required.

### SECTION 3. REVISIONS TO THE INITIAL STUDY BY REFERENCE

Several comments requested that clarifications be made or errors be corrected to the original document. These revisions are noted in this section. None of the changes altered the conclusions of the original environmental document. Text that should be removed is indicated using ~~strikeout~~ while text that should be added is noted using underlining.

**Comment 2.2. Section 3.19 Utilities, D.** [The analysis discusses] water supply impacts although the question is about impacts to solid waste capacity, standards and reduction goals. The response for E under the same section addresses both the impacts to solid waste capacity, standards and reduction goals, as well as negative impacts on solid waste services and reduction goals. Therefore, the responses to D and E should be revised accordingly.

~~As previously indicated, Table 3-6 indicates the water consumption estimated for the proposed project. The proposed project is projected to consume approximately 32,526 gallons of water on a daily basis. The existing water supply facilities can accommodate this additional demand. As a result, the impacts are considered to be less than significant.~~ As indicated under Subsection E, the proposed project is projected to generate approximately 1,700 pounds of solid waste on a daily basis. The proposed project will contribute a limited amount to the waste stream. As a result, the impacts will be less than significant.

**Comment 4.2 and 4.3. Section 3.19 Utilities, E.** The information stated that “The Puente Hills Landfill...is only currently accepting clean dirt. The Sanitation Districts continue to maintain environmental control systems at the other closed landfills, which include the Spadra, Palos Verdes, and Mission Canyon landfills.” However, since the Puente Hills Landfill is closed, it is not accepting any dirt from the public and its environmental control systems are also maintained by the Districts. The information stated that “Operational waste that cannot be recycled or taken to area landfills will be transported to the Commerce incinerator.” However, the Commerce Refuse-to-Energy Facility was closed in June 2018 and does not accept any waste.

The Sanitation Districts operate a comprehensive solid waste management system serving the needs of a large portion of Los Angeles County. This system includes sanitary landfills, recycling centers, materials recovery/transfer facilities, and energy recovery facilities. The two operational sites are the Calabasas Landfill, located near the City of Agoura Hills, and the Scholl Canyon Landfill, located in the City of Glendale. The Puente Hills Landfill was permanently closed in October 2013. ~~and is only currently accepting clean dirt.~~ The Sanitation Districts continue to maintain environmental control systems at the other closed landfills, which include the Spadra, Palos Verdes, the Puente Hills, and Mission Canyon landfills. Local municipal solid waste collection services are currently provided by Consolidated Disposal Services, CR and R Waste and Recycling, and Serv-Well Disposal Company. ~~Operational waste that cannot be recycled or taken to area landfills will be transported to the Commerce incinerator.~~ Trash collection is provided by the Consolidated Disposal Service, CR and R Waste and Recycling, and Serv-Well Disposal Company. Table 3-7 indicates the solid waste generation for the proposed project.

**Comment 4.4 and Comment 4.5. Section 3.19 Utilities, A.** The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts’ South Whittier Outfall Trunk Sections 1, 2, 3, and 4, located in Carmenita Road

at Imperial Highway. The Districts' 33-inch diameter trunk sewer has a capacity of 25.7 million gallons per day (mgd) and conveyed a peak flow of 13.6 (mgd) when last measured in 2019. The wastewater generated by the proposed project will be treated at the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a capacity of 37.5 (mgd) and currently processes an averageflow of 23.1 (mgd).

The City of Santa Fe Springs is located within the service area of the Sanitation District 2 of Los Angeles County. The nearest wastewater treatment plant to Santa Fe Springs is the Los Coyotes Water Reclamation Plant (WRP) located in Cerritos. The Los Coyotes WRP is located at 16515 Piuma Avenue in the City of Cerritos and occupies 34 acres at the northwest junction of the San Gabriel River (I-605) and the Artesia (SR-91) Freeways. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' South Whittier Outfall Trunk Sections 1, 2, 3, and 4, located in Carmenita Road at Imperial Highway. The Districts' 33-inch diameter trunk sewer has a capacity of 25.7 million gallons per day (mgd) and conveyed a peak flow of 13.6 mgd when last measured in 2019. The wastewater generated by the proposed project will be treated at the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an averageflow of 23.1 mgd. The plant was placed in operation on May 25, 1970, and initially had a capacity of 12.5 million gallons per day and consisted of primary treatment and secondary treatment with activated sludge. The Los Coyotes WRP provides primary, secondary and tertiary treatment for 37.5 million gallons of wastewater per day. The plant serves a population of approximately 370,000 people. Over 5 million gallons per day of the reclaimed water is reused at over 270 reuse sites. Reuse includes landscape irrigation of schools, golf courses, parks, nurseries, and greenbelts; and industrial use at local companies for carpet dying and concrete mixing. The remainder of the effluent is discharged to the San Gabriel River. Treated wastewater is disinfected with chlorine and conveyed to the Pacific Ocean. The reclamation projects utilize pump stations from the two largest Sanitation Districts' Water Reclamation plants includes the San Jose Creek WRP in Whittier and Los Coyotes WRP in Cerritos. The Los Coyotes WRP has a design capacity of 37.5 million gallons per day (mgd) and currently processes an average flow of 20.36 mgd. As indicated in Table 3-5, the future development is projected to generate 21,684 gallons of effluent on a daily basis which is well under the capacity of the aforementioned WRPs.

**SECTION 4. COPIES OF ORIGINAL COMMENT LETTERS**



DARYL L. DSOY  
 FIRE CHIEF  
 FORESTER & FIRE WARDEN

**COUNTY OF LOS ANGELES  
 FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
 LOS ANGELES, CALIFORNIA 90053-3294  
 (323) 881-2401  
[www.fire.lacounty.gov](http://www.fire.lacounty.gov)

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**BOARD OF SUPERVISORS**

- HILDA SOLIS  
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- KATHRYN EARGER  
FIFTH DISTRICT

November 1, 2021

Wayne Morrell, Planner  
 City of Santa Fe Springs  
 Planning Department  
 11710 East Telegraph Road  
 Santa Fe Springs, CA 90670

**Received**  
 NOV 04 2021  
 Planning Department

Dear Mr. Morrell:

**NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, "RICHMAN GROUP LAKELAND ROAD HOUSING DEVELOPMENT," IS CONSIDERING AN APPLICATION FOR THE CONSTRUCTION OF A NEW 139-UNIT HOUSING DEVELOPMENT ON A SITE LOCATED NEAR THE INTERSECTION OF LAKELAND ROAD AND LAUREL AVENUE, THE PROPOSED PROJECT WOULD INVOLVE THE CONSTRUCTION AND OCCUPANCY OF 121 RENTAL UNITS AND 18 OWNER-OCCUPIED TOWNHOME CONDOMINIUM UNITS, LOCATED AT 13231 LAKELAND ROAD, SANTA FE SPRINGS, FFER 2021010461**

The Notice of Intent to Adopt a Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

**PLANNING DIVISION:**

The subject property is entirely within the City of Santa Fe Springs, which is not a part of the emergency response area of the County of Los Angeles Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or [Kien.Chin@fire.lacounty.gov](mailto:Kien.Chin@fire.lacounty.gov).

**SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:**

- |                |           |                 |                      |            |           |              |
|----------------|-----------|-----------------|----------------------|------------|-----------|--------------|
| AGOURA HILLS   | CARSON    | EL MONTE        | INGLEWOOD            | LAKELAND   | LYNDHURST | VERONA       |
| ALHAMBRA       | CLAREMONT | GARDENA         | IRVINDALE            | LONG BEACH | LYNNWOOD  | WENDELL      |
| ARLINGTON PARK | COMMERCE  | GLENDORA        | LA CANADA FLINTRIDGE | LYNWOOD    | LYNNWOOD  | WEST GARDENA |
| BELL           | DOWNEY    | HAWTHORNE       | LA HABRA             | LYNWOOD    | LYNNWOOD  | WEST GARDENA |
| BELL GARDENS   | DUARTE    | HUNTINGTON PARK | LA HABRA             | LYNWOOD    | LYNNWOOD  | WEST GARDENA |
| BELLFLOWER     | DUARTE    | INDIO           | LA HABRA             | LYNWOOD    | LYNNWOOD  | WEST GARDENA |
| BREA           | DUARTE    | IRVINE          | LA HABRA             | LYNWOOD    | LYNNWOOD  | WEST GARDENA |
| BURBANK        | DUARTE    | LONG BEACH      | LA HABRA             | LYNWOOD    | LYNNWOOD  | WEST GARDENA |
| CANAAN PARK    | DUARTE    | LONG BEACH      | LA HABRA             | LYNWOOD    | LYNNWOOD  | WEST GARDENA |
| CANAAN PARK    | DUARTE    | LONG BEACH      | LA HABRA             | LYNWOOD    | LYNNWOOD  | WEST GARDENA |
| CANAAN PARK    | DUARTE    | LONG BEACH      | LA HABRA             | LYNWOOD    | LYNNWOOD  | WEST GARDENA |

COMMENTS AND RESPONSE TO COMMENTS  
INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION  
LAKELAND ROAD HOUSING DEVELOPMENT • CITY OF SANTA FE SPRINGS

**Wayne M. Morrell**

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**From:** Toan Duong <TDUONG@dpw.lacounty.gov>  
**Sent:** Thursday, November 4, 2021 5:46 PM  
**To:** Wayne M. Morrell; Jimmy Wong  
**Cc:** Aracely Lasso; Nilda Gemeniano; Kent Tsujii; Stephen Lamm; John Burton; Daniel Keyribaryan  
**Subject:** IS/MND MMRP The Richman Group Lakeland Road Housing Development (RPPL2021011357)

To: City of Santa Fe Springs  
Planning Department

Thank you for the opportunity to review the IS/MND and the MMRP for the subject project.. The proposed project proposes the construction of 121 rental units and 18 owner-occupied townhome condominium units located near the intersection of Lakeland Road and Laurel Avenue.

We have the following comment for your consideration:

1. Page 107 responds to Chapter 3.19 Utilities, D, about water supply impacts although the question is about impacts to solid waste capacity, standards and reduction goals. The response for E under the same section addresses both the impacts to solid waste capacity, standards and reduction goals, as well as negative impacts on solid waste services and reduction goals. Therefore, the responses to D and E should be revised accordingly.

If you have any question regarding this comment, please contact Nilda Gemeniano at 626-458-5184 or [ngemenia@pw.lacounty.gov](mailto:ngemenia@pw.lacounty.gov).

2. The cumulative traffic generated by the project in the area may significantly impact the County's intersections. The traffic finding in the IS/MND cannot be substantiated by Public Works until a traffic impact analysis is submitted to Public Works for review and approval. All traffic impacts and required mitigations for any impacted county's intersection should be identified and included in the environmental documents.

If you have any question regarding this comment, please contact Stephan Lamm at 626-300-4764 or [slamm@pw.lacounty.gov](mailto:slamm@pw.lacounty.gov).

Regards,

*Toan Duong*  
Civil Engineer  
Los Angeles County Public Works  
Office: (626) 458-4921



COMMENTS AND RESPONSE TO COMMENTS  
INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION  
LAKELAND ROAD HOUSING DEVELOPMENT • CITY OF SANTA FE SPRINGS



**GABRIELENO BAND OF MISSION INDIANS - KIZH NATION**  
Historically known as The San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

**Adopt Mitigative Declaration Study / Mitigated Negative Declaration**

October 7, 2021

**Project Name: The Richman Group Lakeland Road Housing Development located: 1321 Lakeland Road, Santa Fe Springs**

We have received your Notice of the Adopt Mitigative Negative Declaration for the Richman Group Lakeland Road Housing development Project. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

Sincerely,  
Gabrieleno Band of Mission Indians/Kizh Nation  
(1844) 390-0787 Office

Andrew Selas, Chairman  
Albert Perez, treasurer I

Nadine Selas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

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COMMENTS AND RESPONSE TO COMMENTS  
INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION  
LAKELAND ROAD HOUSING DEVELOPMENT • CITY OF SANTA FE SPRINGS



**LOS ANGELES COUNTY  
SANITATION DISTRICTS**  
*Converting Waste Into Resources*

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November 1, 2021

Ref. DOC 6329881

Mr. Wayne Morrell  
City of Santa Fe Springs  
Planning Department  
11710 East Telegraph Road  
Santa Fe Springs, CA 90670

Dear Mr. Morrell:

**MND Response to the Richman Group Lakeland Road Housing Development**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the subject project on October 4, 2021. The proposed project is located within the jurisdictional boundaries of District No. 18. We offer the following comments:

1. **Section 3.19 Utilities, *Analysis of Environmental Impacts, Response to Question E*, Page 107:** The information stated that “The Puente Hills Landfill... is only currently accepting clean dirt. The Sanitation Districts continue to maintain environmental control systems at the other closed landfills, which include the Spadra, Palos Verdes, and Mission Canyon landfills.” However, since the Puente Hills Landfill is closed, it is not accepting any dirt from the public and its environmental control systems are also maintained by the Districts.
2. **Section 3.19 Utilities, *Analysis of Environmental Impacts, Response to Question E*, Page 107:** The information stated that “Operational waste that cannot be recycled or taken to area landfills will be transported to the Commerce incinerator.” However, the Commerce Refuse-to-Energy Facility was closed in June 2018 and does not accept any waste.
3. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts’ South Whittier Outfall Trunk Sections 1, 2, 3, and 4, located in Carmenita Road at Imperial Highway. The Districts’ 33-inch diameter trunk sewer has a capacity of 25.7 million gallons per day (mgd) and conveyed a peak flow of 13.6 mgd when last measured in 2019.
4. The wastewater generated by the proposed project will be treated at the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an average flow of 23.1 mgd.
5. The expected average wastewater flow from the project site, described in the MND as a 139-unit housing development, is 21,684 gallons per day. For a copy of the Districts’ average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1. Loadings for Each Class of Land Use](#) link.

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