



Imperial & Euclid Residential Project



MITIGATED NEGATIVE DECLARATION

SCH No. 2021110209

RESPONSES TO COMMENTS AND ERRATA

Lead Agency:

City of La Habra

Chris Schaefer, Senior Planner
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110 East La Habra Boulevard
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December 20, 2021

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EXECUTIVE SUMMARY

The Initial Study / Mitigated Negative Declaration (MND) for the Imperial & Euclid Residential Project, dated November 9, 2021, was posted with the State Clearinghouse and distributed for public review for a 30-day period, from November 15, 2021 through December 14, 2021.

The State Clearinghouse (SCH) Number for the Project is: 2021110209.

This document contains the comments received during that 30-day review period, responses to the comments received, and an errata that documents a change to the MND made to correct a typographical error identified subsequent to its posting with the State Clearinghouse. None of the comments received nor the errata identify new significant information. Consequently, no new analysis or mitigation measures are required, and there is no new information that warrants recirculation of the MND.

Together with the MND and the Imperial & Euclid Residential Project Mitigation Monitoring and Reporting Program (MMRP), this document is part of the California Environmental Quality Act (CEQA) administrative record for the Imperial & Euclid Residential Project.

The Imperial & Euclid Residential Project is a 117 single-family residential unit community, located at 251-351 Imperial Highway, La Habra, CA 90631. This proposed Project includes the following applications through the City of La Habra Department of Community Development:

- SB330 Application to review the document to vest the rights for housing development projects.
- Design Review 21-01 to review the design of the proposed residential construction;
- Conditional Use Permit (CUP) 21-01 to allow concessions for the inclusion of 12 townhomes affordable to moderate income households;
- Tentative Tract Map (TTM) 19143 to reconfigure the site into would a single condominium property that allows common and private use areas.
- Environmental Review 21-01 to review and approve the Project MND pursuant to CEQA.

SECTION 1.0 – COMMENTS AND RESPONSES TO COMMENTS

Comments to the Imperial & Euclid Residential Project MND were received from the following agencies:

1. Dan Phu, Manager, Environmental Programs, Orange County Transportation Authority (OCTA), 550 South Main Street, P.O. Box 14814, Orange, California 92863-1584.
2. Scott Shelley, Branch Chief, Regional-IGR-Transit Planning, Department of Transportation (Caltrans), District 12, 1750 East 4th Street, Suite 100, Santa Ana, Ca 92705.
3. SoCalGas Transmission Technical Services, SoCal Gas, Transmission Technical Services Department, 9400 Oakdale Avenue, Chatsworth, CA 91311.

A copy of each comment letter received by the City of La Habra regarding the Imperial & Euclid Residential Project MND is included in this section. The comments are numbered, then followed by a summary of each comment and a response to the comment.

1.1 DAN PHU, MANAGER, ENVIRONMENTAL PROGRAMS, ORANGE COUNTY TRANSPORTATION AUTHORITY (OCTA), 550 SOUTH MAIN STREET, P.O. BOX 14814, ORANGE, CALIFORNIA 92863-1584.



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December 8, 2021

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

Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for the Imperial & Euclid Residential Development Project

Dear Mr. Schaefer:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Notice of Intent to Adopt a Mitigated Negative Declaration for the Imperial & Euclid Residential Development Project. The Long-Range Planning & Corridor studies has provided a comment for your consideration:

1: • Please note, Imperial Highway is part of the Orange County Congestion Management Program (CMP) Highway System, along with the nearby intersections at Harbor Boulevard and Beach Boulevard. While CEQA now requires vehicle miles traveled to identify transportation impacts, level of service analysis may also be required consistent with the CMP Traffic Impact Analysis (TIA) Guidelines. If determined necessary, the CMP TIA should be submitted to OCTA along with any CEQA documents. For more information, please refer to the 2021 CMP Report available at <http://www.octa.net/Projects-and-Programs/Plans-and-Studies/Congestion-Management-Program/Overview/>.

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,



Dan Phu
Manager, Environmental Programs

Orange County Transportation Authority
550 South Main Street / P.O. Box 14184 / Orange / California 92863-1584 / (714) 560-OCTA (6282)

OCTA Comment 1: OCTA notes that a Vehicle Miles Traveled (VMT) analysis is required, and cites the requirements for a Congestion Management Plan (CMP) traffic impact analysis (TIA).

OCTA Response #1: As discussed previously, Section 6.17 of the MND contains a VMT analysis, and finds that the Project will have a less than significant impact relative to VMT. The threshold for a CMP level of service analysis is an increase of 50 or more trips. The "Imperial & Euclid Residential Development Trip Generation & VMT Analysis, City of La Habra, California," (Trip/VMT Analysis) prepared by RK Engineering Group Inc., contained as Appendix I to the MND, finds that the Project does not add 50 trips or increase trips at any CMP intersection.

Consequently, this comment does not raise any new environmental issue, and no additional response or mitigation is warranted. The City of La Habra appreciates OCTA's comment and participation in the Project environmental review process.

1.2 SCOTT SHELLEY, BRANCH CHIEF, REGIONAL-IGR-TRANSIT PLANNING, DEPARTMENT OF TRANSPORTATION (CALTRANS), DISTRICT 12, 1750 EAST 4TH STREET, SUITE 100, SANTA ANA, CA 92705.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY		Gov'n Newsom, Governor
DEPARTMENT OF TRANSPORTATION DISTRICT 12 1750 EAST 4TH STREET, SUITE 100 SANTA ANA, CA 92705 PHONE (657) 328-6000 FAX (657) 328-6522 TTY 711 www.dot.ca.gov/caltrans-near-me/district12		 Making Conservation a California Way of Life.
December 13, 2021		
Chris Schafer City of La Habra 110 East La Habra Blvd. La Habra, CA 90631	File: IGR/CEQA SCH#: 2021110209 IGR LOG #2021-01829 SR-90	
Dear Mr. Schafer,		
<p>Thank you for including the California Department of Transportation (Caltrans) in the review of the Mitigated Negative Declaration for the Imperial & Euclid Residential Project Development Project. The Project is proposing the development of 117 two- and three-story residential townhome units on a 5.58 acre site. The Project is being processed by the City per the State Density Bonus Law, Senate Bill (SB) 1818, and proposes to commit 12 of the 117 townhomes for sale to qualified moderate income households.</p>		
<p>The proposed project is located at 251 – 351 Imperial Highway in the City of La Habra. Imperial Highway/State Route 90 (SR-90) is owned and operated by Caltrans. Therefore, Caltrans is a responsible agency on this project, and has the following comments:</p>		
<u>Transportation and System Planning</u>		
1:	1. The project is to construct and increase housing units. Due to its changes to residential purposes, it may increase vehicle trips to and from the development vs prior land uses. Possible traffic congestion due to a potential increase in single occupancy vehicle trips should be addressed. As part of the development plan, please consider including a discussion on improving multimodal transportation (i.e., freight, walking, biking, and transit) options to address safety and operational issues as part of the project development. The discussion should incorporate opportunities to support sustainable and multimodal transportation opportunities. These improved connections to the project site can encourage residents/users to utilize alternative	

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transportation modes, thus reducing greenhouse gas emissions, congestion, and vehicle miles travelled.

- 2: 2. Please consider providing adequate wayfinding signage to nearby transit stops within the proposed project.
3. Please consider incorporating designated areas/parking for freight delivery, package pick up and drop off in the site plan design for this project. Also, please consider relegating the parking spaces to the back of the buildings and locate preferential parking for vanpools and carpools, along with, secure, visible, and convenient bicycle parking/racks accessible to the retail and office locations.
4. Consider incorporating further discussion regarding electric vehicle charging stations to promote use of EV and Hybrid vehicles. These charging stations can assist residents in switching to EV/Hybrid vehicles and increase the appeal of these vehicles to those commuting to or utilizing commercial services in the area. Also, consider the increasing growth of other electric personal mobility devices (e.g. scooters, e-bikes, skateboards, etc.).
- 3: 5. Caltrans recognizes and supports the City of La Habra's continued commitment to include development Affordable Housing for the Community. The Department firmly embraces racial equity, inclusion, and diversity. These values are foundational to achieving our vision of a cleaner, safer, and more accessible and more connected transportation system.

NPDES and Stormwater Compliance

- 4: 6. Section 6.10 Hydrology and Water Quality of the Mitigated Negative Declaration states that the project will prepare and implement a Water Quality Management Plan per the city requirements. The section also indicates that the runoff from the site will ultimately discharge to

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Caltrans Right of way via parkway culverts. Storm Drain Connections from the proposed site will require an encroachment permit from Caltrans. In the encroachment permit process, Caltrans District 12 will review the final WQMP approved by the city to ensure that the proposed measures to protect water quality meets Caltrans NPDES permit requirements.

Encroachment Permits

- 5: 7. Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. Based on the proposed scope of work, applicant is highly recommended to review and fill out form TR-0416 'Applicant's Check List to Determine Appropriate Review Process' to determine if the Encroachment Permit Process will be handled by Caltrans Permit's Branch or through Caltrans Project Delivery Quality Management Assessment Process.
8. Applicant must submit the signed Standard Encroachment Permit application form TR-0100 along with a deposit payable to Caltrans. Deposit amount will be dependent on when the application is submitted. Public corporations are legally exempt from encroachment permit fees. However, contractors working for public corporations are not exempt from fees. Project plans and traffic control plans must be stamped and signed by a licensed engineer. For all plans, please show Caltrans R/W lines, the north arrow, the edge of pavement, and edge of the sidewalk, if applicable, and all plans shall be per Caltrans Standard Plans. When submitting the application, please incorporate Environmental Documentation, construction plans showing relevant design details including design exception approvals, hydrology and hydraulics report, traffic control plans, and any letter of authorizations. For specific details on Caltrans Encroachment Permits procedure, please refer to Caltrans Encroachment Permits Manual. The latest edition of the Manual and all Encroachment Permit updates are

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available on the website at <https://dot.ca.gov/programs/traffic-operations/ep>.

9. Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (657) 328-6553 or D12.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

Caltrans' mission is to provide a safe, sustainable, equitable, integrated, and efficient transportation system to enhance California's economy and livability. Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Julie ~~Lugaro~~ at Julie.lugaro@dot.ca.gov.

Sincerely,



Scott Shelley
Branch Chief, Regional-IGR-Transit Planning
Caltrans, District 12

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

Caltrans Comment #1: Caltrans requests that as part of the development plan, the Project discussion include improving multimodal transportation (i.e., freight, walking, biking, and transit) options to address safety and operational issues as part of the project development. The discussion should incorporate opportunities to support sustainable and multimodal transportation opportunities. These improved connections to the Project site can encourage residents/users to utilize alternative transportation modes, thus reducing greenhouse gas emissions, congestion, and vehicle miles travelled.

Caltrans Response #1: Section 6.17 of the Project MND contains a discussion of alternate transportation modes, including pedestrian, bike and transit alternatives in the Project area. This discussion includes data provided by the "Imperial & Euclid Residential Development Trip Generation & VMT Analysis, City of La Habra, California," (Trip/VMT Analysis) prepared by RK Engineering Group Inc., contained as Appendix I to the MND.

As discussed in the MND, the Project site is 0.1 miles from the nearest bus route, and 0.8 miles from the nearest designated bikeway. Existing sidewalks are located along Imperial Highway and the Project proposes four-foot concrete sidewalks throughout the townhome development. Existing transit is proximate to the site, including a connection about 0.1 mile east of the Project site; and an existing Class III bikeway is located approximately 0.8 miles to the east of the site. Sidewalks are available on existing streets and the Project proposes sidewalks within its development. As such, the MND finds that the Project is consistent with Senate Bill (SB) 743, which requires VMT analyses to encourage alternative transportation modes thus reducing greenhouse gas emissions.

Consequently, the discussion requested in this Caltrans comment is already contained in the MND. The comment does not raise any new environmental issue, and no additional response or mitigation is warranted. The City of La Habra appreciates Caltrans' comment and participation in the Project environmental review process.

Caltrans Comment #2: Caltrans requests that the Project consider the following:

- Providing adequate wayfinding signage to nearby transit stops within the proposed Project.
- Incorporating designated areas/parking for freight delivery, package pick up and drop off in the site plan design.
- Relegating the parking spaces to the back of the buildings and locate preferential parking for vanpools and carpools, along with, secure, visible, and convenient bicycle parking/racks accessible to the retail and office locations.

- Incorporating further discussion regarding electric vehicle charging stations to promote use of EV and Hybrid vehicles.

Caltrans Response #2: Caltrans suggestions regarding signage, drop-off areas, vanpool and carpool areas, and EV and Hybrid charging are related to the Project rather than the MND. This comment does not address information or analysis contained within the MND that focuses on the environmental topics identified in the Initial Study, Appendix G of the CEQA Guidelines. The comment does not raise any new environmental issue, and no additional response or mitigation is warranted. However, this comment is appreciated and will be available to the City of La Habra during their deliberation on the proposed Project.

Caltrans Comment #3: Caltrans recognizes and supports the City of La Habra's continued commitment to include development Affordable Housing for the Community.

Caltrans Response #3: This comment addresses the Project's proposed inclusion of affordable residential units. The comment does not address the information or analysis contained within the MND that focuses on the environmental topics contained in the Initial Study, Appendix G of the CEQA Guidelines. The comment does not raise any new environmental issue, and no additional response or mitigation is warranted. However, this comment is appreciated and will be available to the City of La Habra during their deliberation on the proposed Project.

Caltrans Comment #4: Caltrans notes that Section 6.10 Hydrology and Water Quality of the MND Negative Declaration states that the Project will prepare and implement a Water Quality Management Plan per the city requirements. The section also indicates that the runoff from the site will ultimately discharge to Caltrans Right of way via parkway culverts. Storm Drain Connections from the proposed site will require an encroachment permit from Caltrans.

Caltrans Response #4: Mitigation Measure HYD-1 requires that the Project applicant prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) for the construction phase of the Project, and a Water Quality Management Plan (WQMP) for the operation phase acceptable to the Chief Building Official and City Engineer prior to the issuance of a grading permit. Mitigation Measure TR-1 of the MND requires that the Project applicant obtain an encroachment permit from Caltrans for any work in the Imperial Highway right-of-way. These mitigation measures adequately address Caltrans' comment. Consequently, this comment does not raise any new environmental issue, and no additional response or mitigation is warranted. The City of La Habra appreciates Caltrans' comment and participation in the Project environmental review process.

Caltrans Comment #5: This comment states that any work performed within Caltrans right-of-way will require discretionary review and an encroachment permit from Caltrans prior to construction. This comment then provides additional information regarding the encroachment permit process.

Caltrans Response #5: As discussed previously, Mitigation Measure TR-1 of the MND requires that the Project applicant obtain an encroachment permit from Caltrans for any work in the Imperial Highway right-of-way. This mitigation measure adequately addresses Caltrans' comment. Consequently, this comment does not raise any new environmental issue, and no additional response or mitigation is warranted. The City of La Habra appreciates Caltrans' comment and participation in the Project environmental review process.

**1.3 SOCALGAS TRANSMISSION TECHNICAL SERVICES, SOCAL GAS,
TRANSMISSION TECHNICAL SERVICES DEPARTMENT, 9400
OAKDALE AVENUE, CHATSWORTH, CA 91311.**



Transmission Technical
Services Department

9400 Oakdale Ave
Chatsworth, CA 91311
SC9314

December 13, 2021

Chris Schaefer
City of La Habra
CSchaefer@lahabracaca.gov

Subject: Tract Map 19143

DCF: 2181-21NC

- 1:** 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

Best Regards,

SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com

SoCalGas Comment 1: The Transmission Department of SoCalGas does not operate any facilities within the proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within the project scope.

To assure no conflict with the Distribution's pipeline system, SoCalGas requests that the Project applicant / City e-mail them.

SoCalGas Response 1: This comment provides information to the City regarding existing site conditions and indicates that there are no SoCal gas transmission facilities within the site. Additionally, the comment recommends that the Project proponent contact SoCalGas to ensure no conflict at: AtlasRequests/WillServeAnaheim@semprautilities.com.

This comment does not address information or analysis contained within the MND that focuses on the environmental topics contained in the Initial Study, Appendix G of the CEQA Guidelines. The comment does not raise any new environmental issue, and no additional response or mitigation is warranted. However, this comment is appreciated and will be available to the City of La Habra during their deliberation on the proposed Project.

SECTION 2.0 – ERRATA

Following to posting the Project MND with the state clearinghouse, a typographical error was identified that misstated cubic yards to be excavated. This error is discussed below, and corrected as shown in cross out and double underline.

2.1 ERRATA #1

Project Description – Section 2.8.3 Grading

This section of the MND contains a typographical error, stating that the Project is expected to require the export of up to “10” cubic yards of hazardous soil materials. Corrected, the amount of expected export is up to “100” cubic yards of hazardous soil materials. The air quality analysis conducted for the Project and included in Section 6.3 of the MND, correctly analyzes impacts associated with the export of up to 100 cubic yards of hazardous soil materials. Consequently, correcting this error does not require new analysis or mitigation measures, and there is no new information that warrants recirculation of the MND.

Section 2.8.3 of the MND is corrected as follows:

2.8.3 GRADING

Development of the proposed single-family community requires demolition of 61,068 square feet of existing building area and approximately 152,811 square feet of an existing asphalt surface parking lot. The project is also expected to require the export of approximately 836 cubic yards of earthwork materials, including up to ~~10~~100 cubic yards of hazardous soil materials.