

## 2.0 Response to Comments on the Public Review IS/MND

This chapter of the Final Initial Study/Mitigated Negative Declaration (IS/MND) contains responses to the comments that the City of Santa Fe Springs (Lead Agency) received on the Public Review IS/MND (Chapter 1) for the Florence Avenue Townhome Project during the public review period, which began July 13, 2021 and closed August 12, 2021. This document has been prepared in accordance with California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) (Cal. Code Regs., tit. 14, § 15000 et seq.) and represents the independent judgment of the Lead Agency. This document, together with the Public Review IS/MND, the Revisions to the Public Review IS/MND, and the Mitigation Monitoring and Reporting Program comprise the Final MND.

The following public comments were submitted to the City of Santa Fe Spring during the public review period:

1. County of Los Angeles Fire Department, Received August 10, 2021 (3 pages)
2. Los Angeles County Sanitation Districts, Received August 2, 2021 (2 pages)
3. Alejandro Huitron, Received August 12, 2021 (2 pages)

The public comments and responses to comments are included in the public record and are available to the Lead Agency decision-makers for their review and consideration prior to making their decision whether to approve the proposed project. Pursuant to State CEQA Guidelines Section 15074(b) *Consideration and Adoption of a Negative Declaration or Mitigated Negative Declaration*, none of the comments provide substantial evidence that the project will have significant environmental effects which would require preparation of an Environmental Impact Report. Further, none of the information in the letters or responses constitute the type of significant new information that requires recirculation of the Florence Avenue Townhome Project IS/MND for further public review under State CEQA Guidelines Section 15073.5 *Recirculation of a Negative Declaration Prior to Adoption*. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Florence Avenue Townhome Project IS/MND. Additionally, none of this information indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in State CEQA Guidelines Section 15073.5.

This Response to Comments includes revisions to the Public Review Draft MND based upon: (1) clarifications required to prepare a response to a specific comment; and/or (2) typographical errors. These revisions do not alter any impact significance conclusions as disclosed in the MND. Changes made to the MND are identified here in ~~strikeout~~ text to indicate deletions and in underlined text to signify additions. These revisions are also outlined in Chapter 3, Revisions to the Public Review IS/MND.

Although State CEQA Guidelines Section 15088 does not require a Lead Agency to prepare written responses to comments received, the City of Santa Fe Springs has elected to prepare the following written responses with the intent of providing a comprehensive and meaningful evaluation of the

proposed project. The number designations in the responses are correlated to the bracketed and identified portions of each comment letter.

**Letter 1: County of Los Angeles Fire Department, Received August 10, 2021 (1 of 3 pages)**



**COUNTY OF LOS ANGELES  
FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401  
www.fire.lacounty.gov

*"Proud Protectors of Life, Property, and the Environment"*

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

**BOARD OF SUPERVISORS**

HILDA L. SOLIS  
FIRST DISTRICT  
HOLLY J. MITCHELL  
SECOND DISTRICT  
SHEILA KUEHL  
THIRD DISTRICT  
JANICE HAHN  
FOURTH DISTRICT  
KATHRYN BARGER  
FIFTH DISTRICT

August 10, 2021

Jimmy Wong, Associate Planner  
City of Santa Fe Springs  
Planning Department  
11710 E. Telegraph Road  
Santa Fe Springs, CA 90670

Dear Mr. Wong:

**NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, "FLORENCE AVENUE TOWNHOME PROJECT," WOULD DEMOLISH THE EXISTING CHURCH AND PARKING LOT TO REDEVELOP THE 3.02-ACRE PROJECT SITE WITH 63 ATTACHED FOR-SALE 3-STORY MULTI-FAMILY RESIDENTIAL TOWNHOMES AND OPEN SPACE RECREATIONAL AREAS, LOCATED AT 11733 FLORENCE AVE, SANTA FE SPRINGS, FFER 2021007626**

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 Los Angeles County 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 Loretta Bagwell, Planning Analyst, at (323) 881-2404 or [Loretta.Bagwell@fire.lacounty.gov](mailto:Loretta.Bagwell@fire.lacounty.gov).

1.1

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

- |              |             |                  |                      |                      |                       |                  |
|--------------|-------------|------------------|----------------------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CARSON      | EL MONTE         | INGLEWOOD            | LAWDALE              | PICO RIVERA           | SIGNAL HILL      |
| ARTESIA      | CERRITOS    | GARDENA          | IRWINDALE            | LOMITA               | POMONA                | SOUTH EL MONTE   |
| AZUSA        | CLAREMONT   | GLENORA          | LA CANADA-FLINTRIDGE | LYNWOOD              | RANCHO PALOS VERDES   | SOUTH GATE       |
| BALDWIN PARK | COMMERCE    | HAWAIIAN GARDENS | LA HABRA             | MALIBU               | ROLLING HILLS         | TEMPLE CITY      |
| BELL         | COVINA      | HAWTHORNE        | LA MIRADA            | MAYWOOD              | ROLLING HILLS ESTATES | VERNON           |
| BELL GARDENS | CUDAHY      | HERMOSA BEACH    | LA PUENTE            | NORWALK              | ROSEMEAD              | WALNUT           |
| BELLFLOWER   | DIAMOND BAR | HIDDEN HILLS     | LAKEWOOD             | PALMDALE             | SAN DIMAS             | WEST HOLLYWOOD   |
| BRADBURY     | DUARTE      | HUNTINGTON PARK  | LANCASTER            | PALOS VERDES ESTATES | SANTA CLARITA         | WESTLAKE VILLAGE |
| CALABASAS    |             | INDUSTRY         |                      | PARAMOUNT            |                       | WHITTIER         |

**Letter 1: County of Los Angeles Fire Department, Received August 10, 2021 (2 of 3 pages)**

Jimmy Wong, Associate Planner  
August 10, 2021  
Page 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 jurisdiction concerning this project and will be setting conditions.

This project is located in close proximity to the jurisdictional area of the 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.

1.1

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

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.

1.2

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.

**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.

1.3

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.

**Letter 1: County of Los Angeles Fire Department, Received August 10, 2021 (3 of 3 pages)**

Jimmy Wong, Associate Planner  
August 10, 2021  
Page 3

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

RMD:ac

**RESPONSE TO COMMENT LETTER 1: County of Los Angeles Fire Department**

**Comment 1.1:** This comment states that 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 letter states that the project site is not within the response area for the County Fire Department and that the Planning Division and Land Development Unit do not have concerns related to potential project impacts.

**Response to Comment 1.1:** This comment does not identify any concerns related to the content or conclusions of the Florence Avenue Townhome Project IS/MND. No further response is needed or warranted.

**Comment 1.2:** This comment describes the Forestry Divisions authority related to 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. The comment also details the Los Angeles County Oak Tree Ordinance.

**Response to Comment 1.2:** This comment does not identify any concerns related to the content or conclusions of the Florence Avenue Townhome Project IS/MND. Potential impacts related to each of the issue areas have been evaluated within the IS/MND, which determined that impacts would be less than significant with implementation of existing regulations related to erosion control, vegetation, watershed management and mitigation measures related to archeological and cultural resources. The IS/MND determined that the site does not contain rare/endangered species, oak trees, and is not within a fire hazard area. No further response is needed or warranted.

**Comment 1.3:** This comment states that the Health Hazardous Materials Division has no jurisdiction in the City of Santa Fe Springs and provides Los Angeles County Fire Department contact information.

**Response to Comment 1.3:** This comment does not identify any concerns related to the content or conclusions of the Florence Avenue Townhome Project IS/MND. No further response is needed or warranted.

**Letter 2: Los Angeles County Sanitation Districts, Received August 2, 2021 (1 of 2 pages)**

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

**Robert C. Ferrante**  
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
(562) 699-7411 • www.lacsd.org

August 2, 2021

Ref. DOC 6252023

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

Dear Mr. Wong:

**NOI Response for The Florence Avenue  
Townhome Project at 11733 Florence Avenue**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on July 15, 2021. The proposed project is located within the jurisdictional boundary of District No. 18. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge directly to the Districts' Florence Avenue Trunk Sewer, located in Florence Avenue west of Pioneer Boulevard. The Districts' 27-inch diameter trunk sewer has a capacity of 6.5 million gallons per day (mgd) and conveyed a peak flow of 0.1 mgd when last measured in 2019. A 6-inch diameter or smaller direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit issued by the Districts. An 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts. For additional information, please contact the Districts' Engineering Counter at [engineeringcounter@lacsd.org](mailto:engineeringcounter@lacsd.org) or (562) 908-4288, extension 1205. 2.1
2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 259.6 mgd. 2.2
3. The expected increase in average wastewater flow from the project site, described in the document as 63 attached for-sale 3-story multi-family residential townhomes, is 11,443 gallons per day, after the structure on the project site is demolished. 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. 2.3
4. 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 a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. 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 2.4

DOC 6266671.D18

**Letter 2: Los Angeles County Sanitation Districts, Received August 2, 2021 (2 of 2 pages)**

Mr. Jimmy Wong

2

August 2, 2021

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. **2.4**

- 5. 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 CCA. 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 Districts 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. **2.5**

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsdsd.org.

Very truly yours,



Adriana Raza  
Real Property Agent  
Facilities Planning Department

AR:ar

cc: A. Schmidt  
A. Howard

DOC 6266671.D18



**RESPONSE TO COMMENT LETTER 2: Los Angeles County Sanitation Districts**

**Comment 2.1:** This comment introduces the comment letter, and describes that wastewater flows from the project would discharge into the existing 27-inch diameter trunk sewer has a capacity of 6.5 million gallons per day (mgd) and conveyed a peak flow of 0.1 mgd when last measured in 2019. The comment also states that a connection to the trunk sewer requires a permit from the Sanitation Districts.

**Response to Comment 2.1:** The IS/MND describes that the project would install onsite sewer lines that would connect to the existing 27-inch sewer line in Florence Avenue, which would be completed pursuant to permits and approvals from the Sanitation Districts. This comment does not identify any concerns related to the content or conclusions of the Florence Avenue Townhome Project IS/MND. No further response is needed or warranted.

**Comment 2.2:** This comment states that the wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 259.6 mgd.

**Response to Comment 2.2:** This comment does not identify any concerns related to the content or conclusions of the Florence Avenue Townhome Project IS/MND. No further response is needed or warranted.

**Comment 2.3:** This comment states that the increase in wastewater flow from the project is 11,443 gallons per day based on the Districts' average wastewater generation factors, as detailed at [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 to Comment 2.2:** Page 125 of the public review draft IS/MND describes that the Los Angeles County Sanitation District wastewater generation factors (LACSD 2021) estimate that townhome residences generate 156 gallons of wastewater per day. Therefore, the 63 proposed townhome residences would generate approximately 9,828 gallons of wastewater per day. This generation factor is consistent with the District's Table 1, Loadings for Each Class of Land Use link that is listed on the Districts' website. Pursuant to Comment 2.2, wastewater from the site would be treated at the Joint Water Pollution Control Plant that has excess capacity. The 9,828 gallons of wastewater per day would be 0.00007 percent of the existing available capacity of the Joint Water Pollution Control Plant. This comment does not identify any concerns related to the content or conclusions of the Florence Avenue Townhome Project IS/MND. No further response is needed or warranted.

**Comment 2.4:** This comment describes the connection fees that the Sanitation Districts collect to maintain and upgrade wastewater facilities.

**Response to Comment 2.4:** This comment does not identify any concerns related to the content or conclusions of the Florence Avenue Townhome Project IS/MND. No further response is needed or warranted.

**Comment 2.5:** This comment states that the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG) and that all expansions of facilities must be sized and service phased in a manner that will be

consistent with the SCAG regional growth forecast and air quality management plans. The comment also states that the Districts intend to provide service up to the levels that are legally permitted.

**Response to Comment 2.5:** The IS/MND describes in Section 14, *Population and Housing*, that the 63 new residences would result in a 1.1 percent increase in residential units within the City that would not exceed growth projections and would be consistent with the assumptions in the SCAQMD Air Quality Management Plan. In addition, IS/MND Section 3, *Air Quality*, details that emissions generated by construction and operation of the proposed project would not exceed thresholds. This comment does not specifically identify any concerns related to the content or conclusions of the Florence Avenue Townhome Project IS/MND. No further response is needed or warranted.

**Letter 3: Alejandro Huitron, Received August 12, 2021 (1 of 2 pages)**

From: Alejandro Huitron <alxhuitron@aol.com>  
Sent: Thursday, August 12, 2021 10:26 PM  
To: Jimmy Wong  
Cc: Irma Huitron  
Subject: Comments - Notice of Intent to Adopt a Mitigated Negative Declaration "11733 Florence Townhomes Project"

August 12, 2021

To: City of Santa Fe Springs:

We are residents of Lake Center Park Lane and offer the following comments on the Notice of Intent to Adopt a Mitigated Negative Declaration prepared for the "11733 Florence Townhomes Project".

Concerns

3.1

- \* Zone Change
- \* General Plan Amendment
- \* Number of Units
- \* Number of Stories
- \* Parking concerns
- \* Construction hours

Sensitive Receptor

3.2

- \* Document does not take into consideration that the Lake Center Middle School includes the track field located adjacent to the project site.
- \* The track field is used as an athletic facility and is used for school physical education classes during school hours.
- \* The track and field is a sensitive receptor which shares the property line with the project site.
- \* Study describes the project to include a park facility which actually serves as private open space not a park.

Traffic/Noise

3.3

- \* Document refers to traffic counts and data taken during April and June 2021 when schools were operating virtually and not operating under "normal" pre-Covid conditions and therefore does not take into consideration "normal traffic".

**Letter 3: Alejandro Huitron, Received August 12, 2021 (2 of 2 pages)**

\* These traffic counts should be taken again to reflect “normal” traffic and the study should be revised with counts taken after August 2021, which is when in-school operations will resume. 3.3

\* Mitigation of installing a six-foot masonry wall is based on an old 1972 HUD Noise/Land Use Compatibility Matrix and outdated General Plan noise standards.

\* Instead a 10-foot high wall or taller should be required for noise mitigation.

\* Florence Avenue was upgraded to a six-lane configuration in the summer 2020 and connects to the Interstate-5. The homes on Lake Center Lane that back up to Florence Avenue, vibrate when heavy vehicles go by and the homes also vibrate and make cracking noises when the train comes by. 3.4

\* A construction sound wall should be required next to all homes.

Landscaping

\* The project plans call for the removal of a four mature heritage trees along Florence Avenue. These trees should remain in place. 3.5

Sincerely,

Alejandro Huitron  
10726 Lake Center Park Lane

**RESPONSE TO COMMENT LETTER 3: Alejandro Huitron**

**Comment 3.1:** This comment states that the letter is from residents of Lake Center Park Lane and lists concerns including the zone change, General Plan Amendment, number of units, number of stories, parking, and construction hours. The comment does not provide specific concerns related to these issues and does not question the content or conclusions of the IS/MND.

**Response to Comment 3.1:** Pages 36 through 38 of the IS/MND details the project's consistency with the proposed General Plan and zoning designations. As described the proposed Multiple Family Residential land use designation allows up to 21.8 dwelling units per acre, and the project includes 21 units per acre. In addition, the project meets or exceeds the proposed R-3 zone required setbacks, height, and lot coverage standards. Section 3.0, *Project Description*, describes that the project includes 2 garage parking spots per unit, which equals 126 parking spots and 22 guest parking spots that equates to 2.35 parking spots per residential unit, which is more than the City's requirement of 2.0 parking spaces per unit. In regard to construction hours, the IS/MND details in Section 3.0, *Project Description* and Section 13, *Noise* that Construction activities would be limited to the hours between 7:00 a.m. and 7:00 p.m. pursuant to the City's Municipal Code Chapter 155.425.

**Comment 3.2:** This comment states that the document does not take into consideration that the Lake Center Middle School includes the track field located adjacent to the project site, that the track field is used as an athletic facility and is used for school physical education classes during school hours, and that the track and field is a sensitive receptor which shares the property line with the project site. The comment also states that the study describes the project to include a park facility which actually serves as private open space not a park.

**Response to Comment 3.2:** As described on page 4 and shown on Figure 2 and Figure 5 of the IS/MND, the Lake Center Athletic Park is located to the north of the site. The Lake Center Middle School is located further north past the park. The Lake Center Athletic Park includes a running track that is used by the adjacent school. The location of the running tract is identified on pages 77, 86, and 92; and the location of the school facility is identified throughout the IS/MND on pages 4, 46, 77, and 131. Page 49 of the IS/MND describes that sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered sensitive receptors. As shown on Tables AQ-4 and AQ-5, air quality modeling identified that localized emissions impacts related to sensitive receptors adjacent to the project site would be less than significant. The noise analysis describes both the existing noise conditions and the potential noise impacts at the park facility, which is identified by noise measurement B (shown on IS/MND Figure 13). The construction noise analysis identifies that existing noise sensitive receptors are as close as three feet from the project site boundary and that construction noise at the closest sensitive receptors is anticipated to range from 60 dBA Leq to 77 dBA Leq, which is less than the 80 dBA threshold. Therefore, construction noise impacts would be less than significant. In addition, the construction noise over the 14-month period would be temporary in nature and would be required to comply with construction noise regulations in Municipal Code Chapter 155.425 as part of project permitting.

The IS/MND does not state that the project includes a park facility. Page 17 of the IS/MND, under the header of Recreation and Open Space, describes that the project includes approximately 27,800 SF (441 SF/Unit) of common open space that would be provided in an open space recreational area on the site. This would be private open space and recreation facilities to be used for site residents.

**Comment 3.3:** This comment states that the traffic counts conducted for the project were taken during April and June 2021 when schools were operating virtually and not operating under “normal” pre-Covid conditions and therefore does not take into consideration “normal traffic”. The comment states that traffic counts should be taken again to reflect “normal” traffic and the study should be revised with counts taken after August 2021, which is when in-school operations will resume.

**Response to Comment 3.3:** Pages 114 and 115 of the IS/MND details that traffic counts were collected on Tuesday, April 20, 2021 at Pioneer Boulevard and Florence Avenue and on Thursday, June 3, 2021, at Orr and Day Street and Florence Avenue. The schools in the project vicinity were operating on a regular schedule on both of the days when traffic counts were conducted. The Little Lake School District started in-person learning on April 12, 2021<sup>1</sup> and the Whittier Union High School District started in-person learning on April 6, 2021<sup>2</sup>. Also, to provide for a conservative assumption of potential impacts, the traffic analysis for the opening year added a 2 percent per year growth rate to the traffic counts and added trips generated by the other development project in the area. Therefore, the existing and project opening year traffic conditions that are identified in the IS/MND are reflective of an appropriate baseline condition and provide for a conservative estimate of traffic in the opening year of the project.

However, in response to the comment and due to the traffic variation related to distance learning options available in the 2020-2021 school year, additional traffic counts were taken at both intersections on Thursday, August 26, 2021. Full time in-person instruction for the 2021-2022 school year began on Wednesday, August 18, 2021 for the Little Lake City School District and began on Thursday, August 12, 2021 for the Whittier Union High School District. Schools serving the project area were in operation during all of traffic counts. The additional traffic counts are provided in Attachment A. The traffic generated from the proposed project was combined with the new traffic count data and is provided in Table 1.

**Table 1: Opening Year Plus Project Level of Service with Additional Traffic Counts**

Intersection	Opening Year				Opening Year plus Project				Impact?
	AM Peak		PM Peak		AM Peak		PM Peak		
	Delay	LOS <sup>1</sup>	Delay	LOS <sup>1</sup>	Delay	LOS <sup>1</sup>	Delay	LOS <sup>1</sup>	
1. Project Driveway/Florence Ave <sup>2</sup>	0.00	A	0.00	A	15.97	B	13.44	B	No
2. Pioneer Blvd/Florence Ave	38.45	D	28.79	C	38.49	D	28.82	D	No
3. Orr and Day St/Florence Ave	93.18	F	60.78	E	94.17	F	61.23	E	No

<sup>1</sup> Level of Service

<sup>2</sup> Delay on Public Right of Way

As shown in Table 1, utilizing the additional traffic counts, both Florence Avenue at the project driveway and the intersection of Pioneer Boulevard/Florence Avenue would continue to operate at an acceptable LOS D, which would not exceed the City’s threshold. The Orr and Day Street and Florence Avenue intersection would operate below LOS D both with and without the project. Consistent with the conclusions of the Public Review Draft IS/MND, the addition of project traffic would increase the delay at this intersection by less than 1 second, which is a less than significant impact. Therefore, the project would result in a less than significant impact under both traffic count scenarios.

<sup>1</sup> <https://4.files.edl.io/d057/03/30/21/225038-28816d31-bd9c-46af-834c-0efa1ecc3a9b.pdf> and

<https://www.whittierdailynews.com/2021/03/18/coronavirus-little-lake-school-board-votes-to-return-for-in-person-instruction-on-april-12/>

<sup>2</sup> <https://www.wuhd.org/>

**Comment 3.4:** This comment states that mitigation of installing a six-foot masonry wall is based on an old 1972 HUD Noise/Land Use Compatibility Matrix and outdated General Plan noise standards and that a 10-foot-high wall or taller should be required for noise mitigation. The comment also states that Florence Avenue was upgraded to a six-lane configuration in the summer 2020 and connects to the Interstate-5. The comment asserts that homes on Lake Center Lane that back up to Florence Avenue, vibrate when heavy vehicles go by and the homes also vibrate and make cracking noises when the train comes by. The comment further states that a construction sound wall should be required next to all homes.

**Response to Comment 3.4:** The comment related to the 1972 HUD Noise/Land Use Compatibility Matrix and General Plan regulations is inaccurate. The Noise Impact Analysis (IS/MND Appendix F) details that the current General Plan Noise Element identifies an exterior noise standard of 65 dBA CNEL and an interior noise standard of 65 dBA CNEL at residential properties, which are typical noise standards for residential uses within an urban area of southern California. In addition, the existing Noise Ordinance (Municipal Code Section 155.424 (E)) provides noise standards based on the cumulative duration of noise in any 1-hour period. These current standards are used to identify potential impacts related to noise and land use compatibility, as describes on pages 90 and 91 of the IS/MND. As detailed on page 99 (and on Table N-6), with the proposed 6-foot-high CMU walls along the south and east sides of the project site and Mitigation Measure NOI-1 that requires a 3.5-foot-high solid noise barrier (to be constructed of either a minimum 3/8-inch thick glass [tempered or laminate], 3/4-inch wood, or plaster or stucco) on the second-floor balconies of units 3, 8, and 18, the noise levels would be below the City's 65 dBA CNEL residential exterior noise standard and a 10-foot-high wall is not required for noise mitigation.

To identify the existing ambient noise and traffic levels on the site adjacent to Florence Avenue 24-hour noise level measurements were taken approximately 100 feet north of the Florence Avenue centerline beginning on March 31, 2021. These measurements captured existing noise from operation of Florence Avenue and the Southern Pacific Railroad line. In addition, traffic counts were taken (as detailed in Response to Comment 3.3) that identified existing traffic along Florence Avenue. As described in the Caltrans Transportation and Construction Vibration Guidance Manual, 2020<sup>3</sup> vibration related damage to modern residential structures could occur at 1.0 PPV in/sec for transient sources such as roadway related vibration. As shown on IS/MND Table N-9, a large bulldozer would create a vibration level of 0.089 inch-per-second PPV at 25 feet, and as detailed on IS/MND page 104, Mitigation Measure NOI-1 restricts operation of large bulldozers within 20 feet of any offsite residence. Thus, potentially significant vibration impacts from the project would not occur. Existing ambient vibration from roadway and train operations would be accommodated by structural engineering that is required by the California Building Code, which is included in the City's Municipal Code Section 150.001 and verified during the City's construction permitting process.

Regarding construction noise, as detailed in Response 3.1, construction activities would be limited to the hours between 7:00 a.m. and 7:00 p.m. pursuant to the City's Municipal Code Chapter 155.425. Also, as detailed in the IS/MND on pages 97-98 construction noise at the closest sensitive receptors is anticipated to range from 60 dBA Leq to 77 dBA Leq, which is less than the 80 dBA threshold. Therefore, noise impacts would be less than significant. In addition, the construction noise over the 14-month period would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day and the location of construction activities would vary throughout the site. Thus, impacts related to construction noise were determined to be less than significant in the IS/MND; and a construction sound wall would not be required.

<sup>3</sup> <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf>

**Comment 3.5:** This comment states that the project plans call for the removal of a four mature heritage trees along Florence Avenue. These trees should remain in place.

**Response to Comment 3.5:** There are no City designated heritage trees along Florence Avenue. However, non-native ornamental trees exist on the project site and along the Florence Avenue right-of way that is adjacent to the project site. As described in the IS/MND on pages 18 and 55, the project may install new trees along Florence Avenue, which would be new public street trees. Installation and/or removal of any new public street trees would be completed in compliance with the City of Santa Fe Springs Municipal Code Chapters 96.130 through 96.140, also known as the “Tree Ordinance”. The comment does not question the content or conclusions of the IS/MND, and no further response is warranted.