

# **Responses to Comments on Draft Subsequent Initial Study/Mitigated Negative Declaration**

## **Stanton Town Center Specific Plan Project**

**SCH No. 2023110397**

Prepared for

City of Stanton  
Community & Economic Development Department  
7800 Katella Avenue  
Stanton, California 90680  
Contact: Crystal Landavazo, Community & Economic Development  
Director

Prepared by

Psomas  
5 Hutton Centre Drive, Suite 300  
Santa Ana, California 92707  
Contact: Alia Hokuki, AICP

January 9, 2024



---

**TABLE OF CONTENTS**

<b><u>Section</u></b>	<b><u>Page</u></b>
<b>1.0 Introduction and Summary .....</b>	<b>1-1</b>
1.1 Introduction.....	1-1
1.2 Proposed Development.....	1-1
<b>2.0 List of Commenters.....</b>	<b>2-1</b>
<b>3.0 Responses to Comments .....</b>	<b>3-1</b>
3.1 State Agencies .....	3-1
3.2 Regional/Local Agencies .....	3-19
<b>4.0 Revisions As Part of The Final Subsequent IS/MND .....</b>	<b>4-1</b>
4.1 Revisions to the Draft Subsequent IS/MND .....	4-1
4.1.1 Section 4.9, hazards and hazardous materials .....	4-1
4.1.2 Section 4.17, Transportation .....	4-2

*This page intentionally left blank.*

# **1.0 INTRODUCTION AND SUMMARY**

---

## **1.1 INTRODUCTION**

The purpose of this document is to present public comments and responses to those comments received on the Draft Subsequent Initial Study/Mitigated Negative Declaration (Draft Subsequent IS/MND) for the Stanton Town Center Specific Plan Project (State Clearinghouse Number 2023110397). The City of Stanton, as the Lead Agency, has evaluated all substantive comments and has prepared written responses. In accordance with the California Environmental Quality Act (CEQA) Guidelines (Title 14 California Code of Regulations [CCR] Section 15074[b]), the decision-making body of the Lead Agency must consider the Subsequent IS/MND and comments received before approving the Project. This document, which will be provided to the City Council, as the decision-making body, has been prepared in accordance with CEQA and represents the independent judgment of the Lead Agency.

In accordance with the State CEQA Guidelines, Section 15073, the Draft Subsequent IS/MND was circulated for a 30-day public review and comment period beginning on November 15, 2023 and ending on December 14, 2020. Additionally, the Draft Subsequent IS/MND was available at the City of Stanton website. During the public review period, the City received a total of three comment letters from State and regional/local agencies on the Draft Subsequent IS/MND. Written responses have been prepared to all comments received during the comment period and are included in Section 3.0 of this document.

The Final Subsequent IS/MND consists of three documents: (1) the Draft Subsequent IS/MND; (2) the Technical Appendices; and (3) the Responses to Comments document. The Responses to Comments document includes four sections: Section 1.0, provides the introduction; Section 2.0 provides a list of commenters on the Draft Subsequent IS/MND; Section 3.0 provides responses to environmental comments received on the environmental document; and Section 4.0 includes the revisions to the text of the Draft Subsequent IS/MND.

## **1.2 PROPOSED DEVELOPMENT**

The approximate 156.9-acre Project site is in the northern portion of the City of Stanton, which is generally situated south of the cities of Anaheim and Buena Park, west of Garden Grove, and north of Westminster. The Specific Plan area is generally bounded by Cerritos Avenue to the north, Dale Avenue to the east, Katella Avenue to the south, and Rose Street to the west. Existing land uses surrounding the Specific Plan area include a mix of small commercial centers along Beach Boulevard; single-family and multi-family residential uses to the north; a Southern California Edison (SCE) substation and industrial uses to the east; industrial and commercial uses, including ORCO Block and Hardscape and a shopping center anchored by Food 4 Less, to the south; single- and multi-family residential uses to the west; and Stanton City Hall, Stanton Library, and an Orange County Sheriff Substation to the southwest.

The proposed Town Center Specific Plan is intended to improve, enhance, and supplement the land uses within the Specific Plan area by creating a mixed-use, pedestrian-friendly environment. The Project proposes an increase of 139 multi-family dwelling units, excluding accessory dwelling units (ADUs) located on single-family properties. Additionally, with the Project, the Beach Boulevard corridor would be transformed into a mixed-use and pedestrian-friendly community while protecting the existing single-family uses. New gateways are required for corner properties, and opportunities would be created along Beach Boulevard at its intersections with Cerritos Avenue and Katella Avenue to identify the arrival into the Stanton Town Center. The Specific Plan will include policies, guidelines and standards designed to sustain the vision for the Town Center Specific Plan and ensure that future projects stay consistent with the goals and objectives and maintain the intended image for the area.

While the Specific Plan area would increase residential multifamily units, retail/commercial, and light industrial uses through new development and redevelopment, it should be noted that, the Subsequent IS/MND analyzes the potential impacts of the additional 139 multi-family dwelling units only. The existing General Plan for the City of Stanton allows for a total of 1,399 multi-family units within the Town Center Specific Plan area. Since 2008, 4 units have been built, resulting in a remaining capacity of 1,395 multi-family units. The Town Center Specific Plan would allow for an additional 139 units, increasing the remaining capacity to 1,534 multi-family units. The 2008 General Plan Environmental Impact Report (EIR) analyzed the potential impacts emanating from development of 1,399 units. As such, only the additional 139 units are the topic of the environmental analysis in the Subsequent IS/MND.

## 2.0 LIST OF COMMENTERS

---

The following is a list of commenters that submitted written comments on the Draft Subsequent IS/MND. The comments included written correspondence. The comments are listed chronologically and numbered. The responses have been prepared to match the bracketing on the comment letters. Each comment letter is followed by responses to address the comments. The comment letters and responses are included in Section 3.0 of this document.

No.	Commenter	Date of Correspondence	Page Number
<i>State Agencies</i>			
1	Department of Transportation, District 12 (DOT)	December 13, 2023	3-3
2	Department of Toxic Substances Control (DTSC)	December 14, 2023	3-11
<i>Local and Regional Agencies</i>			
3	Orange County Transportation Authority (OCTA)	December 13, 2023	3-21

*This page intentionally left blank.*



## **3.0 RESPONSES TO COMMENTS**

---

The City's responses to comments received on the Draft Subsequent IS/MND are provided below. The responses are numbered to match the bracketing on the comment letter. Comment letters received are categorized by State agencies and regional/local agencies. Within each category, the responses are provided chronologically.

### **3.1 STATE AGENCIES**

Two comment letters were received from the State agencies. The comment letters are listed below:

- Department of Transportation, District 12 (DOT)—December 13, 2023
- Department of Toxic Substances Control (DTSC)—December 14, 2023

*This page intentionally left blank.*

Letter 1

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 12
1750 East 4th Street, Suite 100 | SANTA ANA, CA 92705
(657) 328-6000 | FAX (657) 328-6522 TTY 711
https://dot.ca.gov/caltrans-near-me/district-12



December 13, 2023

Irving Anaya
City of Stanton
7800 Katella Avenue
Stanton, CA 90860

File: LDR/CEQA
SCH#2023110397
LDR LOG #2023-02426
SR-22, SR-39

Dear Mr. Anaya

Thank you for including the California Department of Transportation (Caltrans) in the review of the Stanton Town Center Specific Plan Mitigated Negative Declaration (MND). The proposed Town Center Specific Plan, comprised of 156.9 acres, is intended to improve, enhance, and supplement the land uses within the Specific Plan area by creating a mixed-use, pedestrian-friendly environment. The Project proposes an increase of 139 multi-family dwelling units, excluding accessory dwelling units located on single-family properties. While the Specific Plan area would increase residential multifamily units, retail/commercial, and light industrial uses through new development and redevelopment, the Subsequent MND analyzes the potential impacts of the additional 139 multi-family dwelling units only. Additionally, the Beach Boulevard corridor would be transformed into a mixed-use and pedestrian-friendly community while protecting the existing single-family uses. New gateways are required for corner properties, and opportunities would be created along Beach Boulevard at its intersections with Cerritos Avenue and Katella Avenue to identify the arrival into the Stanton Town Center. The Specific Plan will include policies, guidelines and standards designed to sustain the vision for the Stanton Town Center. The nearest state facility to the project site are SR-22 and SR-39.

DOT-1

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Caltrans is a responsible agency on this project and has the following comments:

DOT-2

- 1. Please conduct a queue analysis from the SR-22 EB and WB off ramps at Beach Boulevard based on the 95-percentile queue. The analysis needs to demonstrate that the off ramps will have the sufficient vehicular storage and will be able to accommodate the additional trips.

DOT-3

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

Mr. Irving Anaya  
December 13, 2023  
Page 2

2. Project must conform with standards set forth in the Caltrans Highway Design Manual for all facilities within State right of way, including ADA accessibility standards or receive approval for deviations. Project must conform to procedures set forth in the Caltrans Project Delivery Procedures manual. Project will coordinate with Caltrans projects in all stages of development, including Middle Mile Broadband Initiative and potential relinquishment proposal.

DOT-4

3. In addition to the proposed Class II bikeway on Katella and Dale and Class I on the Stanton Storm Channel and former Pacific Electric Railroad, consider separated infrastructure such as Class IV bikeways where feasible along major streets connecting residents to transit and job centers (for example, along Katella, Beach, and Cerritos). Please work with adjacent cities and regional entities (i.e., where it concerns SR-39, consult Caltrans) from inception to completion on any cross-jurisdictional complete streets projects. Working with local and regional partners may produce a stronger, more integrated network of active transportation in the area, thus lowering greenhouse gas emissions and reducing traffic congestion, among other benefits.

DOT-5

4. Please consider Caltrans DIB 89-02 (<https://dot.ca.gov/-/media/dot-media/programs/design/documents/dib-89-02-final-a11y.pdf>) when designing and implementing Class IV bikeways; consider HDM 1003.1 ([CHAPTER 1000 \(ca.gov\)](https://www.caltrans.ca.gov/programs/design/documents/hdm-1003-1)) when designing Class I bikeways. For additional guidance on proposed bike parking, see “Essentials of Bike Parking” guidance created by the Association of Pedestrian and Bicycle Professionals (link to online PDF: <https://www.apbp.org/Publications>) . For resources to ensure local and regional connectivity, please review OC Active [https://www.octa.net/pdf/OC\\_ACTIVE\\_REPORT\\_2019-12-23.pdf](https://www.octa.net/pdf/OC_ACTIVE_REPORT_2019-12-23.pdf). In addition, OC Bikeway Report (West/Central) proposes a network of bicycle infrastructure in the project area, including a major Class I corridor utilizing the Pacific Electric RR Right of Way. <https://octa.net/pdf/OCTAD12%20Report12-31-2013.pdf> (pdf pg. 22)

DOT-6

5. Caltrans supports the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. In addition to bicycle parking, consider enhancements such as pedestrian-oriented LED lighting, wayfinding signage, and comfortable connections to nearby active transportation and/or transit facilities. Complete Streets improvements also promote regional connectivity, improve air quality,

DOT-7

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

Mr. Irving Anaya  
 December 13, 2023  
 Page 3

- |  |               |
|--|---------------|
| <p>reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation. Continue to incorporate Complete Streets in project development.</p>   | <p>DOT-7</p>  |
| <p>6. Consider encouraging or incentivizing the use of transit among both construction workers of the proposed development and future employees. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.</p>   | <p>DOT-8</p>  |
| <p>7. Ensure that truck parking, ingress and egress, and staging will not interfere with vehicle parking, pedestrian paths, or bicycle lanes/bicycle parking.</p>  | <p>DOT-9</p>  |
| <p>8. Establish freight pick up &amp; drop off times that do not coincide with peak commute hours to reduce passenger vehicle conflicts and congestion for freight. Consider designating on-street freight-only parking and delivery time windows so trucks will not resort to double parking, thus causing street traffic congestion.</p>   | <p>DOT-10</p> |
| <p>9. For the additional 139 multifamily residential units proposed, consider how many individual packages will be delivered daily to individual residences. Amazon lockers or an equivalent shared drop-off location can help reduce the amount of driving done by delivery trucks and can increase the efficiency of deliveries.</p>   | <p>DOT-11</p> |
| <p>10. Work with local partners and community representatives to mitigate any truck traffic routing onto residential streets or conflicting with other road users, including and especially bicyclists and pedestrians.</p>  | <p>DOT-12</p> |
| <p>11. Caltrans 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. Please consider including a discussion on equity in the environmental document.</p>  | <p>DOT-13</p> |
| <p>12. 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. Prior to submitting to Caltrans Permit's branch, applicant should fill out Applicant's Checklist to Determine Applicable Review Process (QMAP List) Form TR-0416 to determine if project oversight/coordination with Caltrans Project Manager is needed.</p> | <p>DOT-14</p> |

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

Mr. Irving Anaya  
December 13, 2023  
Page 4

Applicant must submit a 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. Please note that all utility work should be disclosed prior to permit submittal, and utility companies are to apply for separate permits for their corresponding work.

DOT-14

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 Maryam Molavi, at [Maryam.Molavi@dot.ca.gov](mailto:Maryam.Molavi@dot.ca.gov).

DOT-15

Sincerely,



Scott Shelley  
Branch Chief – Local Development Review/Climate Change/Transit  
District 12

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

**Letter 1: Department of Transportation, District 12**

**Comment Letter Dated December 13, 2023**

- DOT-1 The comment reiterates the Project description. No response is required.
- DOT-2 The comment regarding the mission of Caltrans for a safe and reliable transportation network is noted. Caltrans is a responsible agency on the Project. No further response is required.
- DOT-3 The comment regarding conducting a queue analysis is noted. Although the traffic study provides a preliminary analysis for the full buildout of the Specific Plan area, the Subsequent IS/MND only analyzes the potential impacts of the additional 139 multifamily dwelling units. The proposed 139 multifamily units are expected to generate 71 peak hour trips. Given the trip distribution, approximately 21 trips would travel to/from the south on Beach Boulevard and not all those trips would necessarily use the interchange at SR-22. Therefore, the study area was limited and does not include Caltrans intersections at this time. When future projects within the Specific Plan area are proposed, further studies may be required, and the Beach Boulevard/SR-22 ramp intersection may be evaluated at that time.
- DOT-4 The Project will be consistent with, or seek approval for deviation from, Caltrans Highway Design Manual standards—including ADA standards—for all facilities within State right-of-way, as appropriate. Additionally, the Project will comply with procedures in the Caltrans Project Delivery Procedures manual and will coordinate with Caltrans projects in all stages, including Middle Mile Broadband Initiative and potential relinquishment proposal.
- DOT-5 The comment regarding working with local and regional partners on any cross-jurisdictional complete streets projects is noted and will be forwarded to the decision makers. It should be recognized that while the comment pertaining to separated infrastructure such as Class IV bikeways along major streets is noted, and the City appreciates benefits of connecting residents to transit and job centers, incorporating Class IV bikeways along roadways such as Katella Avenue, Beach Boulevard, and Cerritos Street is beyond the scope of the proposed Stanton Town Center Specific Plan Project at this time.
- DOT-6 The comment providing resources pertaining to Class IV bikeways, Class I bikeways, bike parking, Association of Pedestrian and Bicycle Professionals, and network of bicycle infrastructure is noted and will be forwarded to the decision makers. No further response is required.
- DOT-7 The comment regarding incorporating multi-modal (pedestrian, bicycle, and transit) facilities and complete streets, which promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections is noted and will be forwarded to the decision makers.

As discussed in the Transportation section of the Subsequent IS/MND, the Stanton Town Center Specific Plan Project, is planned as a mixed-use neighborhood that blends existing uses with new development, maximizes access to existing transit opportunities, and includes a pedestrian and bicycle transportation network. The Specific Plan also incorporates conceptual future transit opportunities into its design, while ensuring that the success of the multi-modal network does not depend on the completion or final details of potential future transit opportunities.

The Stanton Town Center Specific Plan incorporates a “complete streets” approach that prioritizes creation of a true multi-modal transportation system that creates new connections throughout the Specific Plan area. Circulation enhancements are envisioned throughout the Specific Plan area to facilitate multi-modal connectivity and increase pedestrian safety. Design features include, but are not limited to, pavement enhancements such as textured and/or colored concrete or pavers; pedestrian built-out crossings to increase pedestrian visibility; wayfinding signage; new crossings for pedestrians and bicyclists; and short- and long-term bicycle parking.

Additionally, as part of future enhancements, a potential trail is proposed along the existing east-west rail corridor traversing the Specific Plan area. This potential future trail is to connect to another potential trail along the Stanton Storm Channel, which would also provide connectivity to the northeastern portion of the Project site. Court Avenue is also envisioned to include additional pedestrian enhancements, including a future connection across the east-west rail corridor. The pedestrian-focused enhancements along Court Avenue from Katella Avenue to Main Street, will increase connectivity between the southern and northern portions of the Specific Plan Area.

In terms of transit, the Specific Plan area is served by OCTA bus routes. A potential future transit station is identified on the OCTA property located along Beach Boulevard. This transit center could connect users of a potential future light-rail along the former Pacific Electric rail corridor to the multi-modal network within the Specific Plan area.

Lastly, the Stanton Town Center Specific Plan promotes bicycling as a means of mobility. As indicated above, as part of intersection improvements, new crossings are planned for pedestrian and bicyclists. The Specific Plan recognizes the needs of bicycle users and aims to create a safe bicycle network. Thus, considering the proposed enhancements and design guidelines promoting multi-modal circulation, the Project would be in compliance with Caltrans vision.

DOT-8 Please refer to Response DOT-7, above. Considering the availability of public transportation in the area, construction workers and future employees may choose to use transit, as convenient. Also, the comment regarding the benefits of multi-modal transportation in reducing congestion, Vehicle Miles Traveled



(VMT), and improving air quality is noted and will be forwarded to the decision makers.

- DOT-9 The comment regarding activities (truck parking, ingress and egress, and staging) during construction that could interfere with multi-modal circulation and parking is noted and will be forwarded to the decision makers. As discussed in the Transportation section of the Subsequent IS/MND, during demolition and construction activities of future projects, provisions would be in place, including but not limited to, staging construction equipment on the site; avoiding blocking the roadways surrounding the Project site; and maintaining fire/emergency access to the site to avoid impacts to existing circulation and parking. Further, to minimize any potential disruptions on the local circulation system and to facilitate the movement of construction traffic, it is assumed that the City would require implementation of a construction management plan, which is provided as regulatory requirement in the Transportation section.
- DOT-10 The comment regarding establishing freight pick up and drop off times to avoid congestion is noted. However, it should be recognized that the Project is not proposing any industrial uses that are not already allowed. As such, no additional freight is anticipated in the area that would result in potential conflicts with vehicular traffic and result in congestion. Thus, establishing on-street freight-only parking and delivery times would be speculative.
- DOT-11 The comment regarding delivery of packages to future residences and provision of shared drop-off locations, is noted and will be forwarded to the decision makers. While the City appreciates the efficiency of deliveries, provided that the Project is a Specific Plan, and no development project is proposed at this time, it may be speculative to determine the number of individual packages that will be delivered and/or lockers and shared drop off locations.
- DOT-12 Please refer to Response DOT-9, above.
- DOT-13 The comment regarding racial equity, inclusion, and diversity is noted and forwarded to the decision makers. While the City is committed to the same values, the request to include a discussion on equity is beyond the scope of a CEQA document. As such, the Subsequent IS/MND is not required and cannot be modified to discuss and/or identify any potential issues pertaining to equity.
- DOT-14 The comment regarding requirement for discretionary review and approval by Caltrans and an encroachment permit for any work within Caltrans right-of-way is noted. Future applicants will be aware of the application process in obtaining necessary approval and permits, as appropriate. The requirement for separate permits for utility work is also noted. No further response is required.
- DOT-15 The comment regarding coordination with Caltrans for future developments is noted and forwarded to the decision makers. No further response is required.

*This page intentionally left blank*



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200

**Letter 2**



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

December 14, 2023

Irving Anaya  
Senior Planner  
City of Stanton  
7800 Katella Avenue  
Stanton, CA 90860  
[ianaya@stantonca.gov](mailto:ianaya@stantonca.gov)

RE: MITIGATED NEGATIVE DECLARATION (MND) FOR THE STANTON TOWN CENTER SPECIFIC PLAN, DATED NOVEMBER 15, 2023 STATE CLEARINGHOUSE # [2023110397](#)

Dear Irving Anaya,

The Department of Toxic Substances Control (DTSC) received a MND for the Stanton Town Center Specific Plan (Project). The proposed Project comprised of 156.9 acres, is intended to improve, enhance, and supplement the land uses within the Specific Plan area by creating a mixed-use, pedestrian-friendly environment. The Project proposes an increase of 139 multi-family dwelling units, excluding accessory dwelling units located on single-family properties. While the Specific Plan area would increase residential multifamily units, retail/commercial, and light industrial uses through new development and redevelopment, the Subsequent MND analyzes the potential impacts of the additional 139 multi-family dwelling units only. Additionally, the Beach Boulevard corridor would be transformed into a mixed-use and pedestrian-friendly community while protecting the existing single-family uses. New gateways are required for corner

DTSC-1

Irving Anaya  
December 14, 2023  
Page 2

properties, and opportunities would be created along Beach Boulevard at its intersections with Cerritos Avenue and Katella Avenue to identify the arrival into the Stanton Town Center. The Specific Plan will include policies, guidelines and standards designed to sustain the vision for the Stanton Town Center.

DTSC-1

DTSC has identified that this project may affect multiple sites within the project boundaries therefore, based on our project review, we request the consideration of the following comments:

DTSC-2

1. The proposed project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted as a result of this project. This may restrict what construction activities are permissible in the proposed project areas in order to avoid any impacts to human health and the environment.

DTSC-3

2. Due to the broad scope of the project, DTSC is unable to determine all of the locations of the proposed project site, whether they are listed as having documented contamination, land use restrictions, or whether there is the potential for the project site to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. DTSC recommends providing further information on the project site and areas that may fall under DTSC's oversight within the project area. Please review the [City of Stanton's project area](#) in [EnviroStor](#); DTSC's public-facing database.

DTSC-4

3. The Hazardous and Hazardous Material Section 4.9 includes properties that are currently undergoing an environmental cleanup with DTSC oversight. The two properties, the Former [Quicksand](#) property at 8358 Standustrial St. and [All Metals Processing Company](#) at 8401 Standustrial St., had historical releases of hazardous materials and hazardous waste to subsurface soils, groundwater, airborne dust particulate matter, and rain surface runoff. These two properties will not likely be suitable for residential use or for purposes involving

DTSC-5

Irving Anaya  
December 14, 2023  
Page 3

sensitive population such as a hospital, school, and daycare even after oversight of the environmental cleanup is completed. DTSC recommends that the City of Stanton consult with DTSC on any redevelopment involving residential use or use with sensitive population at these two locations and adjacent properties.

DTSC-5

DTSC believes the City of Stanton must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. DTSC recommends the department connect with our unit if any hazardous waste projects managed or overseen by DTSC are discovered.

DTSC-6

DTSC appreciates the opportunity to comment on the Stanton Town Center Specific Plan. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

DTSC-7

Sincerely,



Dave Kereazis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Irving Anaya  
December 14, 2023  
Page 4

cc: (via email)

Governor's Office of Planning and  
Research State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Tamara Purvis  
Associate Environmental Planner  
HWMP – Permitting Division - CEQA Unit  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)

Scott Wiley  
Associate Governmental Program Analyst  
HWMP – Permitting Division - CEQA Unit  
Department of Toxic Substances Control  
[Scott.Wiley@dtsc.ca.gov](mailto:Scott.Wiley@dtsc.ca.gov)

Nicholas Ta  
Senior Environmental Scientist – Supervisor  
SMRP – Cleanup Program  
Department of Toxic Substances Control  
[Nicholas.Ta@dtsc.ca.gov](mailto:Nicholas.Ta@dtsc.ca.gov)

## **Letter 2: Department of Toxic Substances Control**

### **Comment Letter Dated December 14, 2023**

- DTSC-1 The comment reiterates the Project description. No response is required.
- DTSC-2 The comment indicates that the Project may affect multiple sites within the Specific Plan area, as such DTSC requests consideration of their comments. The comment is noted, and responses are provided, below.
- DTSC-3 The comment refers to active and nonactive mitigation and clean-up sites within the Project area that may be impacted by the Project. To avoid potential impacts related to health and the environment, the comment adds, construction activities may be restricted within the Project area. The comment is noted and will be forwarded to the decision makers.

The discussion in Section 4.9, Hazards and Hazardous Materials, of the Subsequent IS/MND, under Threshold (d), identifies that *The EDR Radius Map™ Report with GeoCheck®: City of Stanton Town Center Specific Plan Project, Katella/Cerritos Avenue, Stanton, CA 90680 (Inquiry Number 6680025.2s)*, was prepared for the proposed Project by Environmental Data Resources (EDR) (2021). The report was prepared based on a one-mile radius of the Project site and consists of a search of federal, State, local, tribal, and other databases. The discussion discloses that eight Envirostor listings were reported within the one-mile radius, three of which are within the Specific Plan area. Additionally, the Leaking Underground Storage Tank (LUST) database, as provided by EDR, has disclosed that there are 56 LUST sites within an approximately 0.5-mile radius, 6 of which are located within the Specific Plan area.

However, the analysis in the Subsequent IS/MND determined that while development within the Specific Plan area may include redevelopment of one of these reported Envirostor and LUST regulatory properties in the future—no development project is proposed at this time—implementation of the proposed mitigation measure (MM HAZ-1) would ensure that all new development on the said sites involving hazardous materials or waste, prepare a Phase I Environmental Site Assessment (ESA) prior to future actions for land acquisition, demolition, and/or construction. It was concluded that potential impacts would be less than significant with implementation of MM HAZ-1, which is included below:

**MM HAZ-1** *A formal Phase I Environmental Site Assessment (ESA) shall be prepared for a future project on any of the six Leaking Underground Storage Tank (LUST) sites within the Stanton Town Center Specific Plan area. The Phase I ESA shall be prepared in accordance with American Society for Testing and Materials (ASTM) Standard Practice E 1527-05 or the*

*Standards and Practices for All Appropriate Inquiry (AAI), prior to any land acquisition and/or construction activities. The Phase I ESA shall identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified hazardous materials consultant with Phase II/site characterization and remedial experience prior to land acquisition, demolition, and/or construction.*

DTSC-4 The comment indicates that DTSC cannot determine all locations within the Project area with documented contamination, land use restrictions, or if included on a list of hazardous materials sites. DTSC requests additional information on sites that may fall under DTSC's oversight within the Project area. The comment is noted and will be forwarded to the decision makers.

As discussed above and included in Appendix B of the Subsequent IS/MND, *The EDR Radius Map™ Report with GeoCheck* (2021) prepared for the proposed Project, includes search parameters based on a one-mile radius of the Project site and consists of a search of federal, State, local, tribal, and other databases. The complete list of databases and additional information regarding the identified sites can be found in Appendix C of the Subsequent IS/MND. Three of the eight Envirostor listings are within the Project area. Those three locations are included in the Subsequent IS/MND and provided below. An updated search of the EnviroStor database, using the "City of Stanton" Project area, was conducted, and additional information to the three locations is hereby incorporated on page 4-64 (Threshold "d"), in Section 4.9, Hazards and Hazardous Materials, of the Subsequent IS/MND (deleted text is shown in ~~red strikethrough~~ while new text is shown in *red italics*):

- *All Metals Processing (ESTOR/EPA ID 30340041)/ All Metals Processing Co. of Orange Co. (ESTOR/EPA ID 71002315), 8401 Standustrial Street/Avenue. The Program Type is Historical and Tiered Permit. The Status is "Refer: Other Agency" and "Active."* Last reported activities listed in the EDR Report include a Supplemental Site Investigation Workplan on November 3, 2020, and a Monitoring Report on March 8, 2021. The EDR Report also indicates that a Corrective Measures Study Report, Remedial Action Completion Plan, and a Remedy Selection and Statement of Basis are due in 2023. Additionally, the EDR Report identifies that a Land Use Restriction document is due in 2024.
- *Dichem Dresser/Calla Chemical (ESTOR/EPA ID 30280009), 8100 Electric Avenue. The Program Type is Tiered Permit. The Status is ~~unknown and references~~ "Refer: Other Agency".*
- *Quicksand (ESTOR/EPA ID 70000085), 8358 Standustrial Street. The Program Type is Voluntary Cleanup. The Status is "Active."* Last



reported activity in the EDR report is a Remedial Investigation/Feasibility Study on March 29, 2021. A Site Characterization Report was due in 2021, but no additional information about this characterization report is provided in the EDR Report.

Further, the following EnviroStor listing was identified within 0.765 mile from the Project area. The additional listing is hereby incorporated on page 4-65 (Threshold “d”), in Section 4.9, Hazards and Hazardous Materials, of the Subsequent IS/MND (deleted text is shown in ~~red strikethrough~~ while new text is shown in *red italics*):

- *Basic Electronics, Inc. (ESTOR/EPA ID 71002748), 11762 Wester Avenue O. The Program Type is Tiered Permit. The Status is “No Further Action.”*

The above revisions do not require recirculation of the Subsequent IS/MND under CEQA Guidelines Section 15073.5(c)(4).

Additionally, the LUST database, as provided by EDR, disclosed that 56 LUST sites exist within approximately 0.5 mile of the Project area, six of which are within the Project area. The six sites are included in the IS/MND and provided below:

- *Santa Ana Regional W, 10632 Beach Blvd. Status is Open – Site Assessment. Facility Status is Preliminary Site Assessment Underway*
- *California Shipping, 8151 Electric Avenue. Status is Complete- Case Closed. Facility Status is Pollution Characterization*
- *California Comfort V, 8130 Electric Avenue. Status is Complete- Case Closed. Facility Status is Pollution Characterization*
- *Abel Concrete, 8251 Katella Avenue. Status is Complete – Case Closed. Facility Status is Preliminary Site Assessment Underway*
- *G&M Oil Co #50; 10961 Beach Blvd. Status is Open- Site Assessment.*
- *G&M Oil #50, 10961 Beach Blvd. Facility Status is Pollution Characterization.*

Considering no specific projects nor locations are identified at this time, providing additional information may not be feasible. In the future, when specific projects are proposed, the site-specific Phase I ESAs, as required, would identify the potential issues and whether the site fall under DTSC’s oversight.

DTSC-5 The comment references two sites within the Project area that are undergoing environmental cleanup with DTSC oversight. These two properties, Quicksand and All Metals Processing Company are identified, above. The comment adds

that due to the conditions of these two properties, they will not be suitable for residential use or any use involving sensitive population even after the cleanup is completed. DTSC requests that the City consult with them upon future redevelopment of these two sites. The comment is noted and will be forwarded to the decision makers.

As indicate above, no development projects are proposed at this time, but the City concurs that future development on the said properties would need to be considered carefully and coordinated with DTSC to avoid potential impacts to the future sensitive population on these properties.

DTSC-6 The comment regarding potential significant impacts under CEQA and coordination with DTSC is noted and will be forwarded to the decision makers. No further response is required.

DTSC-7 The comment expresses appreciation for the opportunity to comment on the proposed Project. The comment is noted and will be forwarded to the decision makers. No further response is required.

## **3.2 REGIONAL/LOCAL AGENCIES**

One comment letter was received from the local/regional agencies. The comment letter is listed below:

- Orange County Transportation Authority (OCTA)—December 13, 2023

*This page intentionally left blank.*



Letter 3

AFFILIATED AGENCIES

- Orange County Transit District*
- Local Transportation Authority*
- Service Authority for Freeway Emergencies*
- Consolidated Transportation Service Agency*
- Congestion Management Agency*

December 13, 2023

Mr. Irving Anaya, Senior Planner  
 City of Stanton  
 Community and Economic Development Department  
 Planning Division  
 7800 Katella Avenue  
 Stanton, CA 90630

Via email: [ianaya@stantonca.gov](mailto:ianaya@stantonca.gov)

**Subject: Notice of Intent (NOI) to adopt a Subsequent Mitigated Negative Declaration for the Stanton Town Center Specific Plan**

Dear Mr. Anaya:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Notice of Intent (NOI) to Adopt a Subsequent Mitigated Negative Declaration (IS-MND) regarding the Stanton Town Center Specific Plan. The following comments are provided for you:

OCTA-1

- On page 4-131 and in Exhibit 2-1 (Opportunities and Challenges) of the IS-MND OCTA bus Routes 29 and 50 are depicted. Please add OCTA bus Route 529 to page 4-131 and Exhibit 2-1, as it also serves the project area.

OCTA-2

- On page 3-8 of the Draft Town Center Specific Plan Book, under Section 3.5.1 "Existing Circulation Infrastructure" OCTA bus Routes 29 and 50 are identified to serve the project area. Please also include OCTA bus Route 529 as this route also serves the project area.

OCTA-3

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](mailto:dphu@octa.net).

OCTA-4

Sincerely,

Dan Phu  
 Manager, Environmental Programs

DP:tc

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

*This page intentionally left blank*

**Letter 3: Orange County Transportation Authority**

**Comment Letter Dated December 13, 2023**

OCTA-1 The comment expresses appreciation for having received the Notice of Intent (NOI) for the proposed Project. The comment is noted, and no further response is required.

OCTA-2 The comment indicates that page 4-131 and Exhibit 2-1 of the IS/MND do not identify the additional OCTA bus Route 529 that serves the Project area. The comment is noted, and the discussion is revised for clarification. These revisions do not require recirculation of the Subsequent IS/MND under CEQA Guidelines Section 15073.5(c)(4). The following revisions are hereby incorporated on page 4-131 (under Transit), in Section 4.17, Transportation, of the Subsequent IS/MND (deleted text is shown in ~~red strikethrough~~ while new text is shown in *red italics*):

Transit

The Specific Plan area is served by OCTA Routes 29, ~~and 50~~, *and 529*, as depicted on Exhibit 2-1, Opportunities and Challenges. A potential future transit station is identified on the OCTA property located along Beach Boulevard. This transit center could connect users of a potential future light-rail along the former Pacific Electric rail corridor to the multi-modal network within the Specific Plan Area.

However, no revisions are necessary to Exhibit 2-1, Opportunities and Challenges in Section 2.0, Project Location and Environmental Setting, of the Subsequent IS/MND. OCTA Routes 29 and 259 follow the same route throughout the Project site, and as no bus route numbers are identified on Exhibit 2-1, the exhibit correctly reflects all OCTA bus routes.

OCTA-3 The comment requests the above revision to the Draft Town Center Specific Plan. The comment is noted. Please refer to the Town Center Specific Plan.

OCTA-4 The comment encourages communication with OCTA. The comment is noted and will be forwarded to the decision makers. No further response is required.

*This page intentionally left blank*



## 4.0 REVISIONS AS PART OF THE FINAL SUBSEQUENT IS/MND

---

Revisions have been made to the Draft Subsequent IS/MND based on input received during the public review period and while preparing the responses to comments on the Draft Subsequent IS/MND. The revisions requested do not reflect a substantial change to the Project description, nor would any of the changes result in a new impact or intensification of an impact already identified in the Draft Subsequent IS/MND. The changes are not in response to comments that raise significant environmental issues. Additions to the Draft Subsequent IS/MND are shown in *red italicized* text and deletions are shown in ~~red strikethrough~~ text.

### 4.1 REVISIONS TO THE DRAFT SUBSEQUENT IS/MND

#### 4.1.1 SECTION 4.9, HAZARDS AND HAZARDOUS MATERIALS

In response to DTSC comment letter pertaining to hazardous materials sites and an updated search of the EnviroStor database, using the “City of Stanton” Project area, was conducted, and the following additional information is hereby incorporated on page 4-64 (Threshold “d”), in Section 4.9, Hazards and Hazardous Materials, of the Subsequent IS/MND (deleted text is shown in ~~red strikethrough~~ while new text is shown in *red italics*):

- *All Metals Processing (ESTOR/EPA ID 30340041)/ All Metals Processing Co. of Orange Co. (ESTOR/EPA ID 71002315), 8401 Standustrial Street/Avenue. The Program Type is Historical and Tiered Permit. The Status is “Refer: Other Agency” and “Active.”* Last reported activities listed in the EDR Report include a Supplemental Site Investigation Workplan on November 3, 2020, and a Monitoring Report on March 8, 2021. The EDR Report also indicates that a Corrective Measures Study Report, Remedial Action Completion Plan, and a Remedy Selection and Statement of Basis are due in 2023. Additionally, the EDR Report identifies that a Land Use Restriction document is due in 2024.
- *Dichem Dresser/Calla Chemical (ESTOR/EPA ID 30280009), 8100 Electric Avenue. The Program Type is Tiered Permit. The Status is ~~unknown and references~~ “Refer: Other Agency”.*
- *Quicksand (ESTOR/EPA ID 70000085), 8358 Standustrial Street. The Program Type is Voluntary Cleanup. The Status is ~~A~~active.”* Last reported activity in the EDR report is a Remedial Investigation/Feasibility Study on March 29, 2021. A Site Characterization Report was due in 2021, but no additional information about this characterization report is provided in the EDR Report.

Further, the following EnviroStor listing was identified within 0.765 mile from the Project area. The additional listing is hereby incorporated on page 4-65 (Threshold “d”), in Section

4.9, Hazards and Hazardous Materials, of the Subsequent IS/MND (deleted text is shown in ~~red strikethrough~~ while new text is shown in *red italics*):

- *Basic Electronics, Inc. (ESTOR/EPA ID 71002748), 11762 Wester Avenue O. The Program Type is Tiered Permit. The Status is "No Further Action."*

## **4.1.2 SECTION 4.17, TRANSPORTATION**

In response to OCTA comment letter pertaining to OCTA bus Route 529, the following revisions are hereby made to the text of the Subsequent IS/MND under Transit, on page 4-131 of Section 4.17, Transportation, of the Subsequent IS/MND (deleted text is shown in ~~red strikethrough~~ while new text is shown in *red italics*):

### Transit

The Specific Plan area is served by OCTA Routes 29, ~~and~~ 50, *and 529*, as depicted on Exhibit 2-1, Opportunities and Challenges. A potential future transit station is identified on the OCTA property located along Beach Boulevard. This transit center could connect users of a potential future light-rail along the former Pacific Electric rail corridor to the multi-modal network within the Specific Plan Area.