



MEMORANDUM

To: Mr. Raymond Barragan
Community Development Manager, City of Gardena

From: Rita Garcia
Kimley-Horn and Associates, Inc.

Date: September 9, 2019

Subject: **Melia 178th Street Townhomes Project (Project)
Initial Study/Mitigated Negative Declaration
Responses to Comments Raised During Public Review**

1.0 INTRODUCTION

The Project's Initial Study/Mitigated Negative Declaration (IS/MND) was prepared pursuant to California Environmental Quality Act (CEQA) (Public Resources Code §§21000-21177) and State CEQA Guidelines §15063 requirements.

The IS/MND and supporting documentation were made available for public review pursuant to State CEQA Guidelines §15070. The public review period began on August 15, 2019 and ended on September 3, 2019. The IS/MND and supporting documentation were made available for public review at the following locations:

- City of Gardena Website: <http://www.cityofgardena.org/>,
- Gardena Mayme Dear Library, 1731 West Gardena Boulevard, Gardena, CA 90247, and
- City of Gardena Community Development Department, 1700 West 162nd Street Gardena, CA 90247.

The comment letters received during the public review period are listed below and provided at the end of this Memo.

Letter No / Author / Date

1. Administrative Specialist, Gabrieleno Band of Mission Indians – Kizh Nation, August 21, 2019.

2. Alex Campbell, Assistant CEQA Project Manager; Los Angeles Unified School District, August 29, 2019.

3. Adriana Raza, Customer Service Specialist, Sanitation Districts of Los Angeles County, Facilities Planning Department. September 3, 2019.

Although CEQA and the State CEQA Guidelines do not require a Lead Agency to prepare responses to comments raised regarding an IS/MND, as contrasted with the requirement to prepare responses to comments on a Draft Environmental Impact Report (State CEQA Guidelines §15088), the City of Gardena has elected to prepare the following written responses in the spirit and with the intent of conducting a comprehensive and meaningful evaluation of the proposed Project. The number designations in the responses correlate with the comment letters.

Text changes are intended to clarify or correct information in the Draft IS/MND as initiated by the Lead Agency staff or due to comments raised during the public review period. Revisions to the Draft IS/MND are presented as excerpts, with deleted text indicated as ~~strikeout (example)~~ and added/modified text indicated as double underline (example).

~~Deleted IS/MND text~~ Added IS/MND text

It is noted, none of the corrections or clarifications to the IS/MND identified in this document constitute “significant new information” pursuant to State CEQA Guidelines §15088.5. They do not involve changes in the Project or environmental setting, or significant additional data. They do not result in any new or substantially greater environmental impacts, as compared to those identified in the IS/MND. Moreover, the revisions do not affect the IS/MND’s overall conclusions.

2.0 RESPONSES TO COMMENTS

RESPONSE TO COMMENT LETTER 1

Admin Specialist
Gabrieleno Band of Mission Indians – Kizh Nation
August 21, 2019

- 1-1 This comment is an email cover letter from Brandy Salas, Administrative Specialist, at Gabrieleno Band of Mission Indians – Kizh Nation. This comment does not address

the IS/MND's adequacy or raise a significant environmental issue. As such, no further response is necessary.

- 1-2 This comment is a Kizh Nation Tribal Government request for the retention of a Native American Tribal Consultant to monitor all ground disturbance during the Project. The IS/MND (page 129) includes Mitigation Measure MM TCR-1, which requires that the Project Applicant retain a Tribal monitor/consultant and that they be present onsite during the construction phases that involve the following ground-disturbing activities: grading, excavation, and trenching, within the Project area.

RESPONSE TO COMMENT LETTER 2

Alex Campbell, CEQA Assistant Project Manager

Los Angeles Unified School District

August 29, 2019

- 2-1 This comment is an email cover letter from Alex Campbell, CEQA Assistant Project Manager, Los Angeles Unified School District (LAUSD). This comment does not address the IS/MND's adequacy or raise a significant environmental issue. As such, no further response is necessary.
- 2-2 This comment is introductory and communicates that the LAUSD's comments follow. This comment does not address the IS/MND's adequacy or raise a significant environmental issue. As such, no further response is necessary.
- 2-3 This comment introduces the LAUSD's opinions concerning the Project's environmental impacts on the surrounding community (i.e., pedestrian safety and traffic) and LAUSD schools. Refer to Responses 2-4 and 2-5 below for responses concerning pedestrian safety and traffic, respectively.
- 2-4 This comment alleges the Project's construction-related activities would lead to safety hazards for pedestrians, including those on LAUSD sites. This comment also includes a list of recommended conditions to reduce construction-related pedestrian safety impacts.

IS/MND Section 4.15c identifies the LAUSD schools that would serve the Project:

- 186th Street Elementary School (K-5) – approximately 0.7 mile to the south, at 1581 West 186th Street, Gardena;

- Peary Middle School (6-8) – approximately 1.2 mile to the north, at 1415 West Gardena Boulevard, Gardena; and
- Gardena High School (9-12) – approximately 0.23 mile to the east, at 1301 West 182nd Street, Gardena.

As also indicated in IS/MND **Table 4.13-2: Sensitive Receptors**, additional nearby educational institutions are:

- Pacific Lutheran Junior/Senior High School – approximately 0.22 mile to the south, at 1472 West 182nd Street, Gardena;
- Riley High School – approximately 0.40 mile to the south, at 1618 184th Street, Gardena; and
- Arlington Elementary School – approximately 0.63 mile to the west, at 17800 Van Ness Avenue, Torrance.

Therefore, the nearest school to the Project site is Pacific Lutheran, which is approximately 0.22 mile to the south, and the nearest LAUSD school is Gardena High School, which is approximately 0.23 mile to the east.

Based on the factors presented below, the Project's construction-related activities would not create pedestrian safety hazards and no mitigation or condition of approval is required.

Existing Trucking Warehouse. The Project would displace an existing trucking warehouse. As noted in IS/MND Response 4.17a, during the data collection period, large trucks were observed parked along 178th Street, or pulled over, idling and waiting for an opening on the Project site. IS/MND **Table 4.17-3: Summary of Truck Activity on 178th Street** summarizes the instances observed. Project implementation would remove the existing trucking warehouse, thus, removing the associated trucking activities including the street parking and idling. As indicated in IS/MND **Table 4.17-2: Comparison of Project Trip Generation**, when the existing trips generated by the trucking warehouse are subtracted from the proposed Project trip generation estimates, the Project would result in -22 AM peak hour trips and -13 PM peak hour trips. Thus, the Project would both replace truck trips with passenger vehicles and result in a net decrease in peak hour trips. Therefore, circulation and capacity on the street system serving the Project site would improve with Project implementation.

Project Construction Activities. The Project's proposed improvements would be entirely within the Project site limits, except the proposed utility connections within

West 178th Street. Therefore, except utility-related construction activities, the Project's construction-related activities would occur entirely onsite. Although heavy equipment would be present and truck trips to haul materials on and off the Project site would occur during Project construction via 178th Street, these would be temporary and would represent a decrease in trucking activity, as compared to the existing trucking warehouse.

Although partial closure of West 178th Street would occur during utility-related construction, no full street closure would occur. Construction within a City right-of-way or interferences with normal traffic flow are required to obtain an encroachment permit from the Gardena Public Works Department Engineering Division. Compliance with Work Area Traffic Control Handbook (WATCH) standards would be required for short-term intermittent closures, and a Traffic Control Plan approved by the Public Works Department would be required if prolonged closures are required. Standards may include signage, coning, and traffic control persons.

Pacific Lutheran. Pacific Lutheran, the school located nearest the Project site, is northeast of the Evelyn Avenue at West 182nd Street intersection, approximately 0.22 mile south of the Project site. Given the distance between this school and the Project site, the Project's construction-related vehicles would not be staged or parked on or adjacent to the school. Additionally, Project construction traffic would not utilize Evelyn Avenue or West 182nd Street as truck routes, since trucks are prohibited on these roadways. The City has designated several streets/street segments as truck routes. General Plan Figure CI-3 illustrates the locations of designated truck routes within Gardena and indicates those nearest the Project site are Normandie Avenue to the east and Western Avenue to the west.¹ The Project would use Normandie Avenue or Western Avenue or both as truck routes. Evelyn Avenue and West 182nd Street are not designated truck routes, thus, would not be utilized.

LAUSD Schools.

- LAUSD School Pedestrian Route Maps: These are available online at <https://achieve.lausd.net/Page/3990>. No map exists for Gardena High School, the LAUSD school located nearest the Project site. However, a pedestrian sidewalk is provided along the West 178th Street Project frontage. For analysis

¹ City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006. Figure CI-3: Designated Truck Routes*. Gardena, CA: City of Gardena.

purposes, it is assumed that West 178th Street adjacent to the Project site is part of the Gardena High School students' route to school. Project implementation would remove the existing trucking warehouse, thus, removing the associated trucking activities. Additionally, except utility-related construction activities, the Project's construction-related activities would occur entirely onsite. Although heavy equipment would be present and truck trips to haul materials on and off the Project site would occur during Project construction, these would be temporary and would represent a decrease in activity, as compared to the existing trucking warehouse. Therefore, the pedestrian route to Gardena High School would not be significantly affected by the Project and crossing guards would not be required.

The 186th Street Elementary School Pedestrian Route Map is available at <https://achieve.lausd.net/Page/3990>. No map exists for Peary Middle School; however, it is approximately 1.2 miles from the Project site. The Project site is not near a recommended crossing or primary student route for 186th Elementary School or Peary Middle School. Therefore, the Project would not impact pedestrian routes to these schools and additional crossing guards would not be required.

- Construction Vehicle Staging/Parking: Gardena High School is approximately 0.23 mile to the east of the Project site, 186th Street Elementary School is 1.1 mile to the south, and Peary Middle School is approximately 1.2 mile to the north. Given the distance between these schools and the Project site, no construction-related vehicles would be staged or parked on or adjacent to these schools.

Truck Routes: As previously noted, the truck routes nearest the Project site are Normandie Avenue to the east and Western Avenue to the west. Peary Middle School is northwest of the Normandie Avenue at West Gardena Boulevard intersection and Normandie Avenue forms Gardena High School's western boundary. Thus, under existing conditions, trucks utilizing Normandie Avenue pass by Peary Middle School and Gardena High School. As permitted by City policy, the Project would use Normandie Avenue or Western Avenue or both as truck routes.

186th Street Elementary is southwest of the South Denker Avenue at 184th Street intersection. Project construction traffic would not utilize either of these roadways as a truck route, since trucks are prohibited on these roadways. The

City designated truck routes nearest the Project site are Normandie Avenue and Western Avenue, thus, the Project would use Normandie Avenue or Western Avenue or both as truck routes. South Denker Avenue and 184th Street are not designated truck routes, thus, would not be utilized.

- During construction, security measures such as construction fencing would be implemented. These measures would deter trespassing, vandalism, and short-cut attractions. Project site security has been planned for and additional security patrols would not be required.

2-5 This comment requests that the LAUSD's Transportation Branch be contacted and addresses the Project's potential impacts upon existing school bus routes. Currently, LAUSD school bus routes travel along Normandie Avenue and not along 178th Street, where the Project site is located.² IS/MND Section 4.17 discusses transit facilities and services within the Project area. The Project would continue to be served by the existing transit system during Project construction and operations and would not be significantly impacted. Project implementation would remove an existing trucking warehouse, thus, improving circulation and capacity on the street system. As indicated in IS/MND **Table 4.17-2: Comparison of Project Trip Generation**, when the existing trips generated by the trucking warehouse are subtracted from the proposed Project trip generation estimates, the Project would result in -22 AM peak hour trips and -13 PM peak hour trips. Thus, the Project would result in a net decrease in peak hour trips. All vehicles and trucks associated with the Project are subject to compliance with the California Vehicle Code, which requires that vehicles stop when encountering school buses using red-flashing-lights. Therefore, the Project would not cause traffic delays, negatively impact on-time performance of school buses or vehicle routes to school or affect passenger safety. As such, no further response is necessary.

2-6 This comment details LAUSD's goals and their relation to the Project and provides contact information. This comment also recommends that the recommended Conditions be adopted. Although the recommended Conditions are acknowledged, Project construction may create a temporary inconvenience but will not create a significant environmental impact. As such, the recommended Conditions, including funding for crossing guards, will not be required or included. No further response is necessary.

² LAUSD Transportation Services Division, Personal Communication – Telephone Call, September 9, 2019.

RESPONSE TO COMMENT LETTER 3

Adriana Raza, Customer Service Specialist
Sanitation Districts of Los Angeles County, Facilities Planning Department
September 3, 2019

- 3-1 This comment introduces the Sanitation Districts of Los Angeles County’s (LACSD) response to the Project’s Notice of Intent. This comment does not address the IS/MND’s adequacy or raise a significant environmental issue. As such, no further response is necessary.
- 3-2 This comment provides correction regarding the existing LACSD trunk sewer that extends from the sanitary sewer lift station that would serve the Project. To correct the error, IS/MND Page 134 is revised, as follows:

The lift station discharges flow via an existing 6-inch Schedule 40 pipe to an existing LACSD ~~57-inch truck sewer (Joint Outfall “D”, Unit 2, Section 3)~~ 51-inch diameter lined Joint Outfall “D” Unit 2B Section 2 trunk sewer that continues to flow in the southerly direction within La Salle Avenue.

- 3-3 This comment provides correction regarding the average water flow produced by the Joint Water Pollution Control Plant. To correct the error, IS/MND Page 135 is revised as follows:

The wastewater generated by the proposed Project would be treated at LACSD’s Joint Water Pollution Control Plant located in the City of Carson. The Plant has a capacity of 400 mgd and currently produces an average recycled water flow of ~~254.6 mgd~~ 261.1 mgd.

- 3-4 This comment provides correction regarding the Project’s wastewater generation. To correct the error, IS/MND Page 135 is revised as follows:

~~The Project would generate approximately 0.1393 cfs (90,032 gallons per day (gpd)).~~ Based on LACSD’s average wastewater generation factors, the Project’s expected average wastewater flow would be 22,230 gallons per day (gpd).

- 3-5 This comment states that all other information in the IS/MND concerning LACSD's facilities and service is correct and provides contact information for the comment author. This comment does not address the IS/MND's adequacy or raise a significant environmental issue. As such, no further response is necessary.

3.0 COMMENT LETTERS

The comment letters received during the public review period are provided on the following pages.

From: John F. Signo
To: [Lisa Kranitz Mobile](#); [Garcia, Rita](#)
Subject: FW: Melia Homes 1515 West 178th St. City of Gardena
Date: Wednesday, August 21, 2019 1:31:53 PM
Attachments: [Melia Homes 1515 West 178th St. City of Gardena .pdf](#)

From: Administration Gabrieleno <admin@gabrielenoindians.org>
Sent: Wednesday, August 21, 2019 1:23 PM
To: John F. Signo <jsigno@cityofgardena.org>
Subject: Melia Homes 1515 West 178th St. City of Gardena

1-1

Please see attached

Sincerely,

Brandy Salas

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



Attachments area



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

Notice of Intent to Adopt An Initial Study/ Mitigated Negative Declaration

August 21, 2019

City of Gardena
1700 West 162nd St.
Gardena, CA 90247

PROJECT: Melia Homes 1515 West 178th St. City of Gardena

Good afternoon John Signo,

1-2

We have received your Notice of Intent to adopt a Negative Declaration for the Melia Homes Project in the location of the Los Angeles County. Our Tribal Government is requesting the retention of a Native American Tribal Consultant to monitor all ground disturbance conducted for this project.

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

Andrew Salas, Chairman
Albert Perez, treasurer I

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

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

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

From: John F. Signo
To: [Lisa Kranitz Mobile](#); [Garcia, Rita](#); [Raymond Barragan](#)
Subject: FW: Melia Townhomes
Date: Thursday, August 29, 2019 12:26:29 PM
Attachments: [image001.png](#)
[Comment Letter - 1515 W 178th.pdf](#)

From: Campbell, Alexis <cp-alexis.campbell@lausd.net>
Sent: Thursday, August 29, 2019 11:01 AM
To: John F. Signo <jsigno@cityofgardena.org>
Cc: Martinez, Rosemarie <rmart8@lausd.net>
Subject: Melia Townhomes

Good Morning,

2-1

Attached is a comment letter from the Los Angeles Unified School District. If you have any questions feel free to contact me.

Kindly,

Alex Campbell

CEQA Assistant Project Manager | CP

LAUSD | OEHS

(d) 213.241.4210

(c) 323.286.7377

<http://achieve.lausd.net/ceqa>



Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

August 29, 2019

John Signo
City of Gardena
1700 West 162nd Street
Gardena, CA 90247

SUBJECT: PROJECT LOCATION: 1515 W 178th St.

2-2 Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the project located at 1515 W 178th St. Gardena, 90247.

2-3 Based on the extent/location of the proposed development, it is our opinion that environmental impacts on the surrounding community (pedestrian safety, traffic) may occur; due to the fact that traffic from the new development will be dispersed onto Normandie Ave. which is adjacent to Gardena High School. Since the project may have an environmental impact on LAUSD schools, recommended conditions designed to help reduce or eliminate potential impacts are included in this response.

Pedestrian Safety

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective conditions are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the following language be included in the recommended conditions for pedestrian safety impacts:

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.
- 2-4** • Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.

- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

Traffic/Transportation

LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective mitigations are employed to reduce construction and operation related transportation impacts on District sites, we ask that the following language be included in the mitigation measures for traffic impacts:

2-5

- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.

2-6

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending Gardena HS their teachers and the staff, as well as to assuage the concerns of the parents of these students. Therefore, the recommended conditions set forth in these comments should be adopted as conditions of project approval to offset environmental impacts on the affected school students and staff.

Thank you for your attention to this matter. If you need additional information, please contact me at (213) 241-4210.

Regards,



Alex Campbell
Assistant CEQA Project Manager



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

September 3, 2019
Ref. DOC 5274101



Mr. John Signo
City of Gardena
1700 West 162nd Street
Gardena, CA 90247

Dear Mr. Signo:

NOI Response for
Tentative Tract Map No. 82390, the Melia 178th Street Townhomes Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on August 15, 2019. The proposed project is located within the jurisdictional boundaries of District No. 5. We offer the following comments:

3-1

1. 4.19 Utilities and Service Systems, page 134, paragraph 2 of 4.19c Response – The lift station discharges flow via an existing 6-inch Schedule 40 pipe to the existing LACSD 51-inch diameter lined Joint Outfall "D" Unit 2B Section 2 Trunk Sewer that continues to flow in the southerly direction within La Salle Avenue.

3-2

2. 4.19 Utilities and Service Systems, page 135, Wastewater Treatment paragraph – The wastewater generated by the proposed Project will be treated at LACSD's Joint Water Pollution Control Plant located in the City of Carson. The Plant has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd.

3-3

3. 4.19 Utilities and Service Systems, page 135, Wastewater Treatment paragraph – The paragraph states the Project would generate approximately 0.1393cfs (90,032 gallons per day (gpd)). Based on the Districts' average wastewater generation factors, the expected average wastewater flow from the project, described the document as 114 attached townhomes in 22 building with 48,727 square feet of common space, is 22,230 gallons per day.

3-4

All other information concerning Districts' facilities and sewerage service contained in the document is correct. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

3-5

Very truly yours,

Adriana Raza (handwritten signature)

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:dc
cc: A. Schmidt
A. Howard