

May 2014 | Final Environmental Impact Report

# City of Industry General Plan Update

for City of Industry

*Prepared for:*

**City of Industry**

Contact: Brian D. James, Planning Director  
15625 East Stafford, Suite 100  
City of Industry, California 91744-0366  
626.333.2211

*Prepared by:*

**PlaceWorks**

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Table of Contents

<b>Section</b>	<b>Page</b>
<b>1. INTRODUCTION.....</b>	<b>1-1</b>
1.1 INTRODUCTION.....	1-1
1.2 FORMAT OF THE FEIR.....	1-1
1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES.....	1-2
<b>2. RESPONSE TO COMMENTS .....</b>	<b>2-1</b>
<b>3. REVISIONS TO THE DRAFT EIR .....</b>	<b>3-1</b>
3.1 INTRODUCTION.....	3-1
3.2 DEIR REVISIONS .....	3-1

## Table of Contents

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# 1. Introduction

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## 1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).

According to CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the City of Industry General Plan Update during the public review period, which began February 28, 2014, and closed April 14, 2014. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

## 1.2 FORMAT OF THE FEIR

This document is organized as follows:

***Section 1, Introduction.*** This section describes CEQA requirements and content of this FEIR.

***Section 2, Response to Comments.*** This section provides a list of agencies and interested persons commenting on the DEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (AO1 through AO8 for letters received from agencies and organizations). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

## 1. Introduction

**Section 3. Revisions to the Draft EIR.** This section contains revisions to the DEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the DEIR for public review.

The responses to comments contain material and revisions that will be added to the text of the FEIR. City of Industry staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material 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 Section 15088.5.

### 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

## 2. Response to Comments

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Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Industry) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses.

This section provides all written responses received on the DEIR and the City of Industry's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and strikeout for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the 30-day public review period, which was from February 28, 2014, through April 14, 2014.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
<b>Agencies &amp; Organizations</b>			
A01	County of Los Angeles Fire Department	March 27, 2014	2-3
A02	Southern California Edison	April 11, 2014	2-9
A03	County of Los Angeles Department of Public Works	April 14, 2014	2-13
A04	County Sanitation Districts of Los Angeles	April 14, 2014	2-17
A05	California Department of Fish and Wildlife	April 15, 2014	2-21
A06	State Clearinghouse	April 15, 2014	2-27
A07	City of Diamond Bar	April 17, 2014	2-33
A08	The Gas Company	April 25, 2014	2-41

## 2. Response to Comments

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2. Response to Comments

LETTER AO1 – County of Los Angeles Fire Department (3 pages)



COUNTY OF LOS ANGELES

FIRE DEPARTMENT  
1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294



DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

March 27, 2014

Brian James, Planning Director  
City of Industry  
Planning Department  
15625 East Stafford, Suite 100  
Industry, CA 91744-0366

Dear Mr. James:

**DRAFT ENVIRONMENTAL IMPACT REPORT, SCH # 2011031090, "INDUSTRY GENERAL PLAN UPDATE," TO UPDATE THE CITY'S PLAN AND GUIDE THE GROWTH AND DEVELOPMENT OF THE CITY FOR 25 YEARS OR MORE INTO THE FUTURE, CITYWIDE, CITY OF INDUSTRY (FFER #201400038)**

The Draft Environmental Impact Report 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:**

1. While Table 1-1, Summary of Environmental Impacts, Mitigation Measures, etc., Section 5.12 pertaining to Fire Protection and Emergency Services states that future development accommodated by the General Plan Update would have a less than significant impact and that no mitigation measures are necessary, this is contrary to the response provided to the City of Industry General Plan Update Draft EIR Fire Questionnaire on Dec 16, 2011 (page F-60).
2. The Fire District has expressed a need for an additional fire station within the city in the vicinity of Grand and Garcia Avenues to address growth in this area, which is addressed in Question 6 of the questionnaire. While the city had at one time offered to build the station, there remains insufficient property tax revenue generated in the city to fund a new station's ongoing operating costs. Without this additional fire station, the cumulative impact of any additional development in this vicinity will place an added burden on existing resources in the city.

A01-1

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

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

## 2. Response to Comments

**Brian James, Planning Director**  
**March 27, 2014**  
**Page 2**

3. In addition, the Fire District's response to question 8 of the questionnaire stated:

4. "The General Plan at buildout proposes up to 12.5 million additional square feet of non-residential development and 91.6 square feet of employment space. The impact that this will have depends in part on the proposed uses, location, and density of future development. Consequently, **the effects of this project on the adequacy of the Fire Department's level of service remain uncertain.**" (Emphasis added.)

A01-1  
cont'd

### **LAND DEVELOPMENT UNIT:**

1. This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed the project will not have a significant impact to the Fire Department, Land Development Unit.

2. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit, may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

A01-2

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

4. The County of Los Angeles Fire Department, Land Development Unit, appreciates the opportunity to comment on this project.

### **FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

A01-3

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division, have been addressed.

## 2. Response to Comments

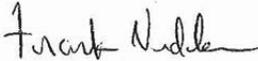
Brian James, Planning Director  
March 27, 2014  
Page 3

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. The Health Hazardous Materials Division has no objection to the proposed project. A01-4

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:jl

## 2. Response to Comments

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## 2. Response to Comments

### **A01. Response to Comments from County of Los Angeles Fire Department, Frank Vidales, Chief, Forestry Division, dated March 27, 2014.**

AO1-1 Please note that the Less Than Significant Impact summary statement provided in Table 1-1, *Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation*, of Chapter 1, *Executive Summary*, of the DEIR is based on the analysis and conclusions provided in Section 5.12.1, *Fire Protection and Emergency Services*, of Chapter 5.12, *Public Services*, of the DEIR. The need for an additional fire station in the vicinity of Grand Avenue and Garcia Avenue due to additional development in the vicinity of the needed fire station location, as stated in this comment, was disclosed in Section 5.12.1 (see page 5.12-7 of the DEIR). As stated in Section 5.12.1, the City has plans to build a new fire station at the intersection of Grand Avenue and Garcia Avenue as part of development plans for the Industry Business Center (IBC) project in the eastern end of the City. Although there is currently no binding or formal agreement with the County of Los Angeles Fire Department (LACFD) for the construction or leasing of the station, construction of a fire station is a mitigation requirement under the IBC project approval, and it is reasonable to assume construction of this new station.

It was also noted in Section 5.12.1 that LACFD has indicated that the impact on LACFD's level of service as a result of additional development that would be accommodated by the General Plan Update is uncertain at this time (see page 5.12-7 of the DEIR), consistent with the information provided by LACFD in the Fire Service Questionnaire dated December 16, 2011 (provided as Appendix F to the DEIR) and reiterated in this comment.

AO1-2 The commenter stated that the General Plan Update will not result in a significant impact to the Land Development Unit of LACFD, as the General Plan Update does not propose the construction of any structures or any other improvements at this time. The commenter also provided a summary of the statutory responsibilities and purposes of the Land Development Unit. The comment is acknowledged and no further response is necessary.

AO1-3 The commenter provided a summary of the statutory responsibilities of the Forestry Division of LACFD. The commenter also stated that the areas germane to the statutory responsibilities of the Forestry Division were addressed in the DEIR. The comment is acknowledged and no further response is necessary.

AO1-4 The commenter stated that the Health Hazardous Materials Division of LACFD has no objections to the General Plan Update. The comment is acknowledged and no further response is necessary.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AO2 – Southern California Edison (1 page)



April 11, 2014

Richard S. Meza, Region Manager  
Local Public Affairs  
800 W. Cienega Avenue  
San Dimas, 91773

Brian James, Planning Director  
City of Industry  
15625 E. Stanford Street, Suite 100  
City of Industry, CA 91744-0366  
bdjames@cityofindustry.org

Re: Draft Environmental Impact Report for City of Industry General Plan Update

Southern California Edison (SCE) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the proposed General Plan Update. The City of Industry General Plan Update would guide the growth and development (e.g., infill development, redevelopment, and revitalization/restoration) of the City 25 years or more into the future. The General Plan Update involves a revision to the current land use map and all elements except Housing, which was adopted February 11, 2014. The General Plan would guide growth and development within the City by designating land uses on the proposed land use map and through implementation of goals and policies.

SCE is concerned about Circulation Policy C2-4 that states, "Explore opportunities to expand the pedestrian and bicycle networks. This includes consideration of utility easements, drainage corridors, road rights-of-way, and other potential options." SCE is the electric service provider for the City of Industry and maintains electrical transmission and distribution facilities, and supporting appurtenances throughout the City. SCE is concerned that the proposed policy may encroach or infringe on SCE's existing rights-of-way, which are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Any proposed use of SCE's rights-of-way must be reviewed on a case-by-case basis by SCE. The impacts will need to be consented to and addressed by SCE prior to finalizing the plan of development. Please forward five (5) sets of plans depicting SCE's facilities and associated land rights to our Real Properties Department at the address below.

Real Properties Department  
Southern California Edison Company  
2131 Walnut Grove Avenue, G.O.3 – Second Floor  
Rosemead, CA 91770

A02-1

Please be advised if development plans result in the need to build new or relocate existing SCE electrical facilities that operate at or above 50 kV, SCE may be subject to the California Public Utilities Commission's (CPUC) General Order 131-D<sup>1</sup>, which contains rules relating to the planning and construction of electric generation, transmission/power/distribution line facilities and substations located in California. If the relocation or construction of new transmission lines results in significant environmental impacts, they must be identified and addressed in a CEQA document. If significant impacts resulting from SCE's facilities are not adequately addressed in a CEQA document, SCE may be required to pursue a separate, mandatory CEQA review through the CPUC, which could delay approval of the SCE transmission line portion of the project for two years or longer.

If you have any questions regarding this letter, please do not hesitate to contact me at [Richard.Meza@sce.com](mailto:Richard.Meza@sce.com) or (909) 592-3758.

Regards,

A handwritten signature in black ink that reads "Richard S. Meza".

Richard S. Meza  
Local Public Affairs Region Manager  
Southern California Edison Company

<sup>1</sup> <http://docs.cpuc.ca.gov/PUBLISHED/Graphics/589.PDF>

## 2. Response to Comments

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## 2. Response to Comments

### **A02. Response to Comments from Southern California Edison, Richard S. Meza, Local Public Affairs Region Manager, dated April 11, 2014.**

AO2-1 The commenter stated that they are concerned with Policy C2-4 of the General Plan Update Circulation Element, which states, “Explore opportunities to expand the pedestrian and bicycle networks. This includes consideration of utility easements, drainage corridors, road rights-of-ways, and other potential options.” Although the comment is directed to a policy of the General Plan Update and not to the adequacy of the analysis provided in the DEIR, it is nonetheless a policy of the General Plan Update, which is the basis for the analysis in the DEIR. Specifically, the commenter stated that they are concerned that implementation of the proposed policy may encroach or infringe on Southern California Edison’s (SCE) existing right-of-ways, which are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. In agreement with the commenter and as noted in this comment, the City acknowledges that any proposed use of SCE’s right-of-ways will be reviewed on a case-by-case basis by SCE. The City understands that any potential opportunities to be explored for expanding pedestrian and bicycle networks along SCE’s right-of-ways will need to be coordinated with SCE, that a stand-alone environmental analysis per CEQA may be required, and that no improvements or plans within these right-of-ways will be implemented unless reviewed and, if within an exclusive SCE easement area, approved by SCE.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AO3 – County of Los Angeles Department of Public Works (2 pages)

April 14, 2014

Mr. Brian James, Director  
Planning Department  
City of Industry  
15625 East Stafford Street, Suite 100  
City of Industry, CA 91744

**DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)  
CITY OF INDUSTRY GENERAL PLAN UPDATE  
CITY OF INDUSTRY**

Thank you for the opportunity to review the DEIR for the City Industry General Plan Update (GPU). The proposed GPU is intended to shape future developments within the City of Industry for the next 20 years or more. The City's General Plan would consist of the following components: Land Use, Circulation, Safety, Conservation, Open Space, Noise and Housing. All of the components, except for the Housing Element, are proposed to be updated in this comprehensive General Plan update.

The following are County of Los Angeles, Public Works' comments and are for your consideration and relate to the environmental document only:

**Hydrology and Water Quality**

1. Section 5.8.1 - Environmental Setting, Local Drainage, page 5.8-5:

- a. The document indicates that the Sanitation District of Los Angeles maintains the primary drainage infrastructure for managing flooding in and around the City, however this information is incorrect. The Los Angeles County Flood Control District (LACFCD) maintains drainage systems that have been transferred from the City. Please note not all drainage systems within the City of Industry have been transferred to the LACFCD.
- b. Figure 5.8-2 is cited as depicting the primary drainage infrastructure maintained by the [LACFCD]. However, this figure includes both LACFCD and non-LACFCD drainage systems but they are all being identified as belonging only to the LACFCD. For your reference, a map of drainage systems belonging to

A03-1

A03-2

## 2. Response to Comments

Mr. Brian James  
April 14, 2014  
Page 2

LACFCD is available online at the following website  
<http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>

2. Section 5.8.1 - Environmental Setting, Local, *Stormwater Permit (MS4 Permit)*, page 5.8-21: The document states that the LACFCD is the "Principal Permittee" for this permit. Since November 2012, under the current MS4 permit the LACFCD is no longer the "Principal Permittee". The LACFCD, Los Angeles County Department of Public Works, and 84 Incorporated Cities are all Permittees under the current permit and each jurisdiction is responsible to implement its own storm water management program. A03-3
  
3. Section 5.8.3 – Environmental Impacts, Impact 5.8-3, page 5.8-29: This item should also discuss that any future storm drain system that is to be transferred to the LACFCD for operation and maintenance must also be designed, permitted, and built to the satisfaction of both the City Engineer and LACFCD. A03-4

If you have any questions regarding the Hydrology and Water Quality comments, please contact Mr. Toan Duong of Land Development Division at (626) 458-4921 or [tduong@dpw.lacounty.gov](mailto:tduong@dpw.lacounty.gov).

If you have any other questions or require additional information, please contact Juan Sarda of Land Development Division at (626) 458-4921 or [jsarda@dpw.lacounty.gov](mailto:jsarda@dpw.lacounty.gov).

JS:

P:\dpub\SUBPCHECK\Plan Checking Files\Zoning Permits\NonCounty Projects\City of Industry General Plan Update\2014-03-05 Submittal\2014-4-14, CITY OF INDUSTRY, GENERAL PLAN UPDATE, DEIR DPW COMMENTS.docx

## 2. Response to Comments

### A03. Response to Comments from County of Los Angeles Department of Public Works, Juan M. Sarda, dated April 14, 2014.

- AO3-1 The commenter stated that the incorrect agency that maintains the primary infrastructure for managing flooding in and around the City was noted in the *Local Drainage* subsection of Section 5.8.1, *Environmental Setting*, of Chapter 5.8, *Hydrology and Water Quality*, of the DEIR. The agency noted that it should be revised from County Sanitation Districts of Los Angeles County to the Los Angeles County Flood Control District (LACFCD). In response to the commenter, the correct agency has been added to Section 5.8.1 and other areas of Chapter 5.8 (as necessary), as described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- AO3-2 The commenter stated that the drainage infrastructure improvements shown in Figure 5.8-2, *Stormwater Drainage System*, are all identified as belonging to LACFCD. However, it should be noted that it is not the intent of Figure 5.8-2 to denote that all of the drainage infrastructure improvements shown in the figure are maintained by LACFCD; some are maintained by the City. The figure simply illustrates the overall drainage infrastructure of the City. However, in response to the commenter, clarification to this affect has been added to the *Local Drainage* subsection of Section 5.8.1, *Environmental Setting*, of Chapter 5.8, *Hydrology and Water Quality*, of the DEIR, as described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- AO3-3 The commenter stated that LACFCD is no longer the “principal permittee” of the MS4 permit, as currently noted in the *Stormwater Permit (Ms4 Permit)* subsection of Section 5.8.1, *Environmental Setting*, of Chapter 5.8, *Hydrology and Water Quality*, of the DEIR. The LACFCD, Los Angeles County Department of Public Works, and 84 incorporated cities are all “permittees” under the current permit and each jurisdiction is responsible to implement its own stormwater management program. In response to the commenter, this clarification has been added to Section 5.8.1 and other areas of Chapter 5.8 (as necessary), as described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- AO3-4 The commenter requested that additional text be provided under Impact 5.8-3 of Chapter 5.8, *Hydrology and Water Quality*, of the DEIR regarding future storm drain systems needing to be transferred to LACFCD. In response to the commenter, the additional text has been added under Impact 5.8-3, as described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AO4 – County Sanitation Districts of Los Angeles County (2 pages)



### COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
[www.lacsd.org](http://www.lacsd.org)

GRACE ROBINSON HYDE  
Chief Engineer and General Manager

April 14, 2014

Ref File No.: 2910707

Mr. Brian James, Planning Director  
City of Industry  
15625 East Stafford, Suite 100  
City of Industry, CA 91744-0366

Dear Mr. James:

#### **Industry General Plan Update**

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on March 3, 2014. The proposed development is located within the jurisdictional boundaries of Districts Nos. 15, 18, and 21. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain only the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines and storm drains are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City of Industry (City) except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, including storm drains please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works. A04-1
2. The Districts function on a regional scale and consist of 23 independent special districts serving about 5.5 million people in Los Angeles County. The Districts' service area covers approximately 824 square miles and encompasses 78 cities and unincorporated territory within the County. Approximately 1,445 miles of main trunk sewer, 49 active pumping plants, and 11 wastewater treatment plants convey and treat about half the wastewater in Los Angeles County. A04-2
3. The wastewater generated by the proposed project will be treated at one or more of the following: San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a design capacity of 100 million gallons per day (mgd) and currently processes an average flow of 73.7 mgd; the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 263.7 mgd, and/or the Los Coyotes WRP located in the City of Cerritos, which has a design capacity of 37.5 mgd and currently processes an average flow of 21.2 mgd. A04-3
4. In order to estimate the volume of wastewater the project will generate, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1. Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors. A04-4

DOC: #2910707.D151821

Recycled Paper

## 2. Response to Comments

Mr. Brian James

-2-

April 14, 2014

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727. A04-5
6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design 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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities. A04-6

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

Very truly yours,

Grace Robinson Hyde



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

DOC: #2910707.D151821

## 2. Response to Comments

### A04. Response to Comments from County Sanitation Districts of Los Angeles County, Grace Robinson Hyde, Chief Engineer and General Manager, dated April 14, 2014.

- AO4-1 The commenter stated that no deficiencies exist in the Sanitation Districts facilities that serve the City, which include the large trunk sewers that form the backbone of the regional wastewater conveyance system. The comment is acknowledged and no further response is necessary.
- AO4-2 The commenter provided a brief description of the Sanitation Districts operations, service area, and wastewater facilities and infrastructure. The comment is acknowledged and no further response is necessary.
- AO4-3 The commenter provided a description of the various wastewater treatment plants that would treat wastewater generated by future development in the City that would be accommodated by the General Plan Update. In response to the commenter, the additional text and clarifications have been added to the *Wastewater Treatment and Collection* subsection of Section 5.14.2.1, *Environmental Setting*, of Chapter 5.14, *Utilities and Service Systems*, of the DEIR, as described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- AO4-4 The commenter requested that the amount of wastewater that would be generated by each of the General Plan Update's land uses be verified with the Sanitation District's average wastewater generation factors by land use, as outlined in Table 1 (Loading for Each Class of Land Use) of the Sanitation District's web link provided in the comment. In response to the commenter, the wastewater generation rates and footnotes provided in Table 5.14-6, *Estimated Net Change in Wastewater Generation due to Theoretical Buildout of the General Plan Update*, of Chapter 5.14, *Utilities and Service Systems*, have been verified and updated accordingly, as described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- AO4-5 The commenter provided a summary of the Sanitation Districts required sewerage system connection fee and also provided a web link to where more information on the connection fee can be found. Through its development review and building plan check process, the City ensures and will continue to ensure that all applicable Sanitation District fees are paid by individual developers at the time formal development plans are submitted to the City for review and approval.
- AO4-6 The commenter provided a summary of how the capacity of the Sanitation Districts wastewater treatment facilities are required to conform to the requirements of the Federal Clean Air Act and tied to the Southern California Association of Governments regional growth forecasts for the county. The commenter also stated that the comment letter does not constitute a guarantee of wastewater service, but is to advise the City that the Sanitation Districts intend to provide wastewater service up to the levels that are legally permitted. The comment is acknowledged and no further response is necessary.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AO5 – California Department of Fish and Wildlife (4 pages)



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



April 15, 2014

Mr. Brian James, Planning Director  
City of Industry  
15625 East Stafford, Suite 100  
City of Industry, CA 91744  
Phone #: (626) 333-2211  
Fax #: (626) 961-6795  
Email bdjames@cityofindustry.org

**Subject: Comments on the Draft Environmental Impact Report for the City of Industry  
General Plan Update, Los Angeles County (SCH# 2011031090)**

Dear Mr. James:

The Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the City of Industry General Plan Update (Plan) relative to impacts to biological resources. The DEIR was submitted by the City of Industry (City) acting as the Lead Agency under the California Environmental Quality Act (CEQA). The DEIR is intended to address the environmental effects associated with the implementation of the City's proposed General Plan Update.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq.

A05-1

The City is located in eastern Los Angeles County, within the East San Gabriel Region. The Plan encompasses approximately 7,706 acres. The City is surrounded by portions of unincorporated Los Angeles County and the cities of La Puente, Baldwin Park, West Covina, and Walnut to the north; the cities of Pomona and Diamond Bar to the east; and unincorporated Los Angeles County to the south and west.

The City has approximately 790 acres of land designated for recreation and open space, including two private golf courses, the Pacific Palms Resort, flood control facilities (including the San Gabriel River), former Duck Farm property, and a privately held open area (former golf course) for the Wildwood Mobile Home Park. The area of land in the City available for open space and recreation is approximately 887 acres. Other green spaces in the City include privately held and required landscaping around buildings and along street frontages.

The Department offers the following comments and recommendations to assist the City in avoiding or minimizing potential impacts on biological resources.

*Conserving California's Wildlife Since 1870*

## 2. Response to Comments



Mr. Brian James, Planning Director  
City of Industry  
April 15, 2014  
Page 2 of 4

2014 General Plan (February 2014), Resource Management Element, Section 3.2.3 Open Space and Recreation Resources

The proposed Plan states "Given that there are no areas of biological or habitat significance in The City of Industry, there is no open space designated solely for the preservation of natural resources. The San Gabriel River is designated as recreation and open space for public health and safety reasons and for its potential recreational and resource value. Additionally, since no resource production activities exist in the City, no lands are designated as open space for the purposes of the managed production of resources."

The Department respectfully disagrees with this statement. The City has several features within and adjacent to City boundaries, such as Walnut Creek Wash, San Gabriel River, Rio Hondo Wash, San Jose Creek, open space near Rose Hills, the Duck Farm property and open space off of Temple Avenue, that are important both locally and regionally to biological resources. Furthermore, several Rare, Threatened, and Endangered Species have been reported within the City, including but not limited to, the California gnatcatcher (*Poliophtila californica californica*) and coast horned lizard (*Phrynosoma blainvillii*) at the Industry Hills Golf Club, and San Bernardino aster (*Symphotrichum defoliatum*) and many stemmed dudleya (*Dudleya multicaulis*) near Temple Avenue. The final EIR should reflect this information.

A05-2

The Department anticipates that additional environmental documents will need to be prepared and tiered from the EIR for certain subsequent Plan activities (CEQA Guidelines, §§ 15152 & 15162). Accordingly, further review under CEQA should occur for any project requiring discretionary approval from the City. Any future projects proposed within the City should evaluate both direct and indirect impacts to biological resources.

Impacts to Streams and Wetlands

The Department believes the Plan should identify the sites which have the potential to support streams under the regulatory authority of the Department. The Department has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a responsible agency. The Department as a responsible agency under CEQA may consider the Lead Agency's CEQA document for the project. To minimize additional requirements by the Department pursuant to Section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA.

A05-3

1. Episodic Streams. The Department may take jurisdiction on episodic streams, including alluvial fan streams even where flow occurs as sheet flooding. The paper recently published by the Department, *A Review of Stream Processes and Forms in Dryland Watersheds*, discusses the alluvial process and the significance to water resources (Vyverber, Kris.

## 2. Response to Comments

Mr. Brian James, Planning Director  
City of Industry  
April 15, 2014  
Page 3 of 4

California Department of Fish and Game, *Review of Stream Processes and Forms in Dryland Watersheds*. October, 2010, California Department of Fish and Game, California Wildlife Habitat Relationships website: (<http://www.dfg.ca.gov/biogeodata>). The Department recommends the City utilize a hydrogeomorphologist familiar with assessments in dryland watersheds to conduct a jurisdictional delineation of the creeks to be included in the Plan. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service wetland definition adopted by the Department.<sup>1</sup> Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

2. In Stream Structures. The Department recommends future projects exclude the placement of check dams, new culverts, or other flow restriction devices within waters of the state to retain the barrier-free status of these stretches of the stream and utilize open-span bridges in lieu of culvert crossings.
3. Other Downstream Sensitive Species. Future projects should include a thorough study of the hydrological impact to downstream resources from stream impacts.

A05-3  
cont'd

### Breeding and/or Nesting Birds

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). In order to avoid impacts to nesting birds, the Plan should require that any clearing of vegetation, and when biologically warranted, construction activities, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January for some raptors). If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist, with experience in conducting breeding bird surveys, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

A05-4

<sup>1</sup> Cowardin, Lewis M., et al. 1979. *Classification of Wetlands and Deepwater Habitats of the United States*. U.S. Department of the Interior, Fish and Wildlife Service.

<sup>2</sup> NOTE: Buffer area shall increase to 300 feet for passerines and 500 feet for raptors if any endangered, threatened, or Department species of special concern are identified during protocol or pre-construction presence/absence surveys or until a nesting bird avoidance and minimization plan has been submitted by the Permittee.

## 2. Response to Comments

Mr. Brian James, Planning Director  
City of Industry  
April 15, 2014  
Page 4 of 4

Thank you for this opportunity to provide comments. Please contact Ms. Kelly Schmoker, Senior Environmental Scientist (Specialist) at (949) 581-1015 if you should have any questions and for further coordination on the proposed project Plan.

Sincerely,



Betty J. Courtney  
Environmental Program Manager  
South Coast Region

ec: Ms. Erinn Wilson, CDFW, Los Alamitos  
Ms. Kelly Schmoker, CDFW, Mission Viejo  
Ms. Mary Meyer, CDFW, Ojai  
Mr. Scott Harris, CDFW, Pasadena  
Mr. Brock Warmuth, CDFW, Los Alamitos  
Scott Morgan, State Clearinghouse, Sacramento

## 2. Response to Comments

### A05. **Response to Comments from California Department of Fish and Wildlife, Betty J. Courtney, Environmental Program Manager, South Coast Region, dated April 15, 2014.**

AO5-1 The commenter stated that the California Department of Fish and Wildlife (CDFW) is a Trustee Agency over natural resources affected by the General Plan Update and also a Responsible Agency over those aspects of the General Plan Update that come under their purview. The commenter also provided a summary of the various recreation and open space areas in the City, which are described in detail in Chapters 3, *Project Description*, and 4, *Environmental Setting*, of the DEIR. The comment is acknowledged and no further response is necessary.

AO5-2 The commenter stated that the City has several features within and adjacent to the City boundaries that are important both locally and regionally to biological resources, and that several rare, threatened and endangered species have been reported within the City. The commenter also stated that additional environmental review and documentation will need to be provided for certain subsequent General Plan Update activities in order to evaluate potential direct or indirect impacts to biological resources.

Chapter 5.3, *Biological Resources*, of the DEIR, provides a detailed description of the various biological resources in the City. A discussion of the potential impacts on biological resources as a result of implementation of the General Plan Update was provided under Impacts 5.3-1 through 5.3-5, pages 5.3-14 through 5.3-18 of Chapter 5.3. For example, as outlined under Impact 5.3-3, any future development projects accommodated by the General Plan Update that would disturb or impact riparian habitat would be required to prepare site-specific environmental documentation (e.g., jurisdictional delineation) in accordance with CEQA and the requirements of the applicable regulatory agency (e.g., CDFG, USFWS, Corps) to ensure that no impacts would occur or that impacts would be mitigated accordingly. This would be ensured through the City's development review process.

AO5-3 The commenter stated that the General Plan Update document should identify sites in the City that have the potential to support streams and wetlands under the regulatory authority of CDFW. The commenter also stated that CDFW has regulatory authority over activities that could alter streams and wetlands under their jurisdiction. Additionally, the commenter provided a summary of the process for notifying CDFW when potential alterations to streams and wetlands would occur, and also provided a summary of the process and requirements associated with alterations to streams and wetlands.

Chapter 5.3, *Biological Resources*, of the DEIR, provides a detailed description of the various sites in the City that support streams and wetlands. For example, as stated in subsection *Waters and Wetlands* of Section 5.3.1, *Environmental Setting*, of Chapter 5.3 (see page 5.3-10), water bodies and wetlands in the City include San Gabriel River, Diamond Bar Creek, San Jose Creek, Puente Creek, Walnut Creek, and an unnamed drainage

## 2. Response to Comments

tributary to San Jose Creek. A discussion of the potential impacts to these water bodies and wetlands as a result of implementation of the General Plan Update was provided under Impact 5.3-4, on page 5.3-17 of Chapter 5.3. For example, as outlined under Impact 5.3-4, any future development projects accommodated by the General Plan Update that would disturb or impact wetlands would be required to prepare site-specific environmental documentation (e.g., jurisdictional delineation) in accordance with CEQA and the requirements of the applicable regulatory agency (e.g., CDFG, USFWS, Corps) to ensure that no impacts would occur or that impacts would be mitigated accordingly. This would be ensured through the City's development review process.

- AO5-4 The commenter stated that in order to avoid impacts to breeding and/or nesting birds, the City should require that any clearing of vegetation, and when biologically warranted, construction activities occur outside the peak avian breeding season, which generally runs from February 1 through September 1. The commenter also stated that if avoidance of the avian breeding season is not feasible, that surveys by a qualified biologist be conducted and that adequate measures be implemented during construction activities.

A discussion of the potential impacts to migratory native bird species as a result of implementation of the General Plan Update was provided under Impact 5.3-5, on page 5.3-18 of Chapter 5.3, *Biological Resources*, of the DEIR. For example, as outlined under Impact 5.3-4, clearing of vegetation is required to occur outside of the peak avian breeding season, which generally occurs from February 1 through September 1 (as early as January for some raptors). If project construction is necessary during the bird breeding season, a qualified biologist is required to conduct a survey for nesting birds within three days prior to the work, and ensure that no nesting birds in the project area would be impacted. If an active nest is identified, a buffer must be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer must be a minimum width of 300 feet (500 feet for raptors), delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction is permitted within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Adherence to the MBTA regulations would ensure that appropriate measures would be taken to avoid impacts to nesting birds if construction on these vacant lots occurs during the breeding season.

## 2. Response to Comments

LETTER AO6 – State Clearinghouse (3 pages)

	<p>STATE OF CALIFORNIA GOVERNOR'S OFFICE of PLANNING AND RESEARCH STATE CLEARINGHOUSE AND PLANNING UNIT</p>	
<p>EDMUND G. BROWN JR. GOVERNOR</p>		<p>KEN ALEX DIRECTOR</p>
<p>April 15, 2014</p>		
<p>Brian James City of Industry 15625 E. Stafford Street, Suite 100 Industry, CA 91744</p>		
<p>Subject: General Plan Update SCH#: 2011031090</p>		
<p>Dear Brian James:</p>		
<p>The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on April 14, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.</p>		
<p>Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.</p>		
<p>Sincerely, </p>		
<p>Scott Morgan Director, State Clearinghouse</p>		
<p>1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov</p>		

A06-1

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## 2. Response to Comments

### Document Details Report State Clearinghouse Data Base

**SCH#** 2011031090  
**Project Title** General Plan Update  
**Lead Agency** Industry, City of

**Type** EIR Draft EIR

**Description** The proposed project is the update of the City's General Plan. The Industry General Plan Update would guide the growth and development (e.g., infill development, redevelopment, and revitalization/restoration) of the City 25 years or more into the future. The General Plan Update involves a revision to the current land use map and all elements except Housing. It would guide growth and development within the City by designating land uses in the proposed land use map and through implementation of the goals and policies of the General Plan Update. The General Plan Update consists of the following elements: Land Use, Circulation, Resource Management (previously Open Space, Historic and Cultural, City image, Scenic Highway, and Noise Elements), and Safety. Assuming a theoretical buildout (post 2035 scenario) of the land use plan, the City of Industry (including its Sphere of Influence) is projected to accommodate approximately 98,128,503 sf of employment uses, 11,877,163 sf of commercial uses, 238.9 acres dedicated to institutional purposes, 840.6 acres dedicated to recreation and open space, and 108,008 jobs.

#### Lead Agency Contact

**Name** Brian James  
**Agency** City of Industry  
**Phone** (686) 333-2211  
**email**  
**Address** 15625 E. Stafford Street, Suite 100  
**City** Industry **State** CA **Zip** 91744  
**Fax**

#### Project Location

**County** Los Angeles  
**City** Industry  
**Region**  
**Lat / Long** 33° 59' 54" N / 117° 53' 11" W  
**Cross Streets** Citywide  
**Parcel No.** various  
**Township** 2S **Range** 10W **Section** **Base** San Bern

#### Proximity to:

**Highways** SR 57 & 60  
**Airports** El Monte Airport  
**Railways** Union Pacific  
**Waterways** San Gabriel River, Walnut Creek, San Jose Creek, Coyote Creek  
**Schools** 33 public  
**Land Use** Various

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Economics/Jobs; Septic System, Sewer Capacity

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Air Resources Board; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

## 2. Response to Comments

### Document Details Report State Clearinghouse Data Base

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*Date Received* 02/27/2014    *Start of Review* 02/27/2014    *End of Review* 04/14/2014

## 2. Response to Comments

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## 2. Response to Comments

**A06. Response to Comments from State Clearinghouse, Scott Morgan, Director, dated April 15, 2014.**

AO6-1 This comment acknowledges that the State Clearinghouse received the DEIR and distributed it to select state agencies for review during the designated public review period. The comment is acknowledged and no further response is necessary.

## 2. Response to Comments

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## 2. Response to Comments

LETTER AO7 – City of Diamond Bar (3 pages)



### City of Diamond Bar

21810 Copley Drive • Diamond Bar, CA 91765-4178

(909) 839-7000 • Fax (909) 861-3117  
www.DiamondBarCA.gov

April 17, 2014

Via US Mail and  
email to [bdjames@cityofindustry.org](mailto:bdjames@cityofindustry.org)

Brian James, Planning Director  
15625 East Stafford Street, Suite 100  
City of Industry, CA 91744

RE: DRAFT ENVIRONMENTAL IMPACT REPORT- INDUSTRY GENERAL  
PLAN UPDATE

Dear Mr. James:

Thank you for the opportunity to provide comments on the review the DEIR for the City of Industry General Plan Update. Our comments are provided below.

**Carol Herrera**  
Mayor

**Steve Tye**  
Mayor Pro Tem

**Ling-Ling Chang**  
Council Member

**Nancy A. Lyons**  
Council Member

**Jack Tanaka**  
Council Member

1. It is the City of Diamond Bar's understanding that there are still two separate, non-expired and essentially mutually exclusive entitlements for the IBC project site. If the entitlement comprising the NFL stadium-based project is implemented, then the associated settlement agreement between Industry and Diamond Bar will be activated. Although Industry considers the original IBC project to be the "most case" scenario from a CEQA perspective, the settlement agreement addresses specific traffic/transportation mitigations that would be mandatory only under the stadium-based project scenario. It also serves as a "baseline" for defining traffic/transportation impacts and needed mitigations should development plans for this site change. The General Plan Update DEIR should recognize and incorporate the stadium-based project settlement agreement and all required mitigations measures. Any potential mitigation measures in the DEIR for any alternative development(s) at the IBC site must be consistent with the current traffic/transportation agreements between the Cities of Industry and Diamond Bar.

A07-1

2. City of Diamond Bar traffic/transportation, policies/regulations must be utilized in analyzing and mitigating any study locations in the City of Diamond Bar.

A07-2

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## 2. Response to Comments

Mr. Brian James  
April 17, 2014  
Page 2

3. City of Diamond Bar traffic/transportation, policies/regulations must be utilized in analyzing and mitigating any study locations in the City of Diamond Bar. A07-3
4. The current SR-57/60 freeway congestion must be properly accounted for in the traffic/transportation analyses. It is known that any significant "new development" traffic which is oriented to the freeway could impact local roadways (including those in the City of Diamond Bar), given the current congestion on the freeway. A07-4
5. The following City of Diamond Bar NOP comments do not appear to have been properly/completely addressed:
- a. There was a request for all "previously identified mitigation measures identified in the 2008 Revised IBC Plan of Development," to be addressed in the DEIR which must still occur for impacts and mitigations of the General Plan Update to be adequate. It should be recalled the IBC development alternative has consistently been considered to represent "worst case" traffic conditions when compared to the football stadium alternative (the stadium has been considered less impactful for transportation matters). The transportation mitigation measures in this General Plan Update DEIR, as they relate to the City of Diamond Bar, need to reflect these findings.
  - b. The NOP requested City of Diamond Bar policies/regulations be applied for analyses of locations in Diamond Bar, but no intersections in Diamond Bar were analyzed. With net trip generation increases of 145,377 daily trips ends, 10,406 during the AM peak hour and 14,938 during the PM peak hour – many which will be added to the areas adjacent to, and near Grand Avenue and Brea Canyon Road, likely to impact the City of Diamond Bar – certainly traffic impacts that extend beyond the City of Industry borders likely impacting Diamond Bar roadways. A07-5
  - c. The mainline freeway analyses of the SR-57 and SR-60 in the DEIR appears to be based on freeway traffic counts. These counts, however, are not likely to accurately reflect the existing/future congestion levels. Given the significant trip generation increases identified above, it is anticipated the new General Plan related traffic will further exacerbate the "freeway bypass" traffic impacts the City of Diamond Bar presently experiences.
6. The City of Diamond Bar has concerns that the existing conditions analyses (e.g., SR60/57 at Grand Avenue, etc.) do not accurately reflect the field observed traffic impacts. If the existing conditions do not reflect actual existing impacts, then unidentified traffic impacts and insufficient mitigation measures will result for Project/future conditions. It is also noted the TIA is dated November 16, 2011, and the existing conditions analyses are for year 2010. It must be assured the 2010 analyses still accurately represent current conditions. A07-6

## 2. Response to Comments

Mr. Brian James  
April 17, 2014  
Page 3

7. The "Study Area Intersections and Roadway Segments" section of the DEIR does not provide a methodology to identify intersections outside the City of Industry limits that may be impacted by the substantial increase in development and traffic documented in the DEIR, which is problematic.

a. It appears that the study area for the DEIR intersection analyses were selected to be only intersections within the City of Industry and freeway ramp locations, but without technical basis.

b. Subsequently, the DEIR conclusions regarding significant Project traffic impacts were based on findings only at the study intersections (and the freeway mainline analyses) but no intersection in other cities (e.g., DiamondBar). This methodology is flawed. The study area cannot be "confined" without technical basis, then make DEIR findings that no impacts occur outside the study area (based on a limited study area that lacked technical basis).

c. Based on the trip generation assumptions, it is inconceivable there will be no traffic impacts beyond the City of Industry borders (i.e., in the City of Diamond Bar).

A07-7

8. The assumed "Programmed Transportation Improvements" must accurately reflect current plans. Some assumed improvements are not accurately identified (e.g., the programmed improvement assumptions for the SR60/57 at Grand Avenue interchange do not match recent analyses provided for a City of Diamond Bar project), which means the associated analyses will not be accurate.

A07-8

9. The "Programmed Transportation Improvements," need to reference the transportation mitigation agreements between the City of Industry and City of Diamond Bar developed during the environmental process related to the football stadium project. While some mitigations may be specific to the stadium traffic, it should be remembered the IBC project has continually been considered more impactful than the stadium project with respect to traffic/transportation, therefore previously identified and agreed upon mitigations, need to be accounted for in the General Plan EIR.

A07-9

Again, thank you for the opportunity to review the General Plan Update Draft EIR for the City of Industry.

Sincerely,



Greg Gubman, AICP  
Community Development Director

## 2. Response to Comments

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## 2. Response to Comments

### **A07. Response to Comments from City of Diamond Bar, Greg Gubman, Community Development Director, dated April 17, 2014.**

AO7-1 The commenter is correct in stating that there are two approved and non-expired entitlements for the Industry Business Center (IBC) site, which were both fully and adequately analyzed under separate and certified Environmental Impact Reports (EIR): 2004 Industry Business Center EIR (SCH #2003121086; 2004 IBC EIR) and 2008 Supplement to the Industry Business Center EIR (SCH #2003121086; 2008 IBC EIR). The commenter is also correct in stating that if the entitlement comprising the NFL stadium-based project (which was analyzed in the 2008 IBC EIR) is implemented, the settlement agreement (which includes specific, negotiated traffic/transportation mitigation measures) between Industry and Diamond Bar will be activated.

However, the commenter is incorrect in stating that the NFL stadium-based project analyzed in the 2008 IBC EIR and related settlement agreement serve as a baseline for defining traffic/transportation impacts in the City of Industry General Plan Update DEIR should development plans for the IBC site change from the project analyzed in the 2008 IBC EIR. The 2008 IBC EIR and subsequent settlement agreement do not constitute the baseline condition for the General Plan Update. Per the CEQA Guidelines, the baseline is defined as the existing conditions at the time of release of the Notice of Preparation (NOP). The NOP for the General Plan Update DEIR was released on March 28, 2011, just over three years later than when the 2008 IBC EIR was certified (and its associated development plan approved) by the City of Industry in January 2009. Therefore, the baseline for the General Plan Update DEIR (including analysis of traffic/transportation impacts) is existing conditions at the time the NOP was released on March 28, 2011.

It should be noted that the traffic study conducted for the General Plan Update (provided as appendix F to the DEIR) took into consideration the development plan of the IBC site considered in the 2004 IBC EIR (considered the worst-case development and traffic/transportation impact scenario for the IBC site), and the traffic that would be generated by that development plan. The 2004 IBC EIR and related traffic study adequately considered, analyzed, and mitigated (mitigation includes various improvements in Diamond Bar) all traffic/transportation-related impacts of that development plan. If the development plan considered in the 2004 IBC EIR is realized, the traffic improvements outlined in the mitigation measures of that EIR will be triggered and implemented accordingly. However, the development plan considered in the 2004 IBC EIR is not a part of the General Plan Update and is therefore, not required to be incorporated into the General Plan Update DEIR.

Additionally, the 2008 IBC EIR and related traffic study adequately considered, analyzed, and mitigated (mitigation includes various improvements in Diamond Bar) all traffic/transportation-related impacts of the NFL stadium-based project analyzed in the

## 2. Response to Comments

2008 IBC EIR; with other specific, negotiated traffic/transportation mitigation measures outlined in the settlement agreement. If the NFL stadium-based project is realized, the settlement agreement between Industry and Diamond Bar and the additional mitigation measures agreed to in that document will be activated and all related traffic mitigation improvements will be triggered and implemented accordingly. However, the NFL stadium-based project and subsequent settlement agreement are not a part of the General Plan Update and are therefore not required to be incorporated into the General Plan Update DEIR.

- AO7-2 The commenter stated that the City of Diamond Bar's traffic/transportation policies and regulations must be utilized in analyzing and mitigating any study locations in Diamond Bar. As shown in Figure 5.13-1, *Study Area Intersections and Roadway Segments*, of Chapter 5.13, *Transportation and Traffic*, of the DEIR, of the 46 study area intersections that were selected for detailed peak hour traffic counts and traffic impact/level of service analyses in the traffic study conducted for the General Plan Update (provided as appendix F to the DEIR), the traffic study area did not include any intersections in the City of Diamond Bar, as implementation of the General Plan Update would not impact any intersections in Diamond Bar. The basis and rationale for the selection of the study area intersections is provided in the traffic study conducted for the General Plan Update (provided as Appendix F to the DEIR).

It should be noted however, that the 2004 and 2008 IBC EIRs and their associated traffic studies did analyze a number of intersections in the City of Diamond Bar that would be impacted by the IBC plan of development analyzed in each EIR and that those traffic studies utilized the City of Diamond Bar's traffic/transportation policies and regulations in order to determine impacts to intersections in Diamond Bar. Any improvements necessary for intersections in Diamond Bar as a result of the plan of development considered in the 2004 IBC EIR were adequately provided in the traffic/transportation mitigation measures of that EIR. Additionally, any improvements necessary for intersections in Diamond Bar as a result of NFL stadium-based project were adequately provided in the traffic/transportation mitigation measures of the 2008 IBC EIR and subsequent settlement agreement. No future development in the City of Industry that would be accommodated by the General Plan Update would create traffic/transportation impacts in Diamond Bar beyond what the 2004 and 2008 IBC EIRs already analyzed and mitigated for.

- AO7-3 See response to Comment AO7-2.

- AO7-4 The commenter stated that the current SR-57/60 congestion must be properly accounted for in the traffic/transportation analysis and that any significant new development that is oriented to SR-57/60 could impact local roadways, including those in Diamond Bar. The General Plan Update's impacts on freeway mainline segments and on/off-ramp intersections (including those of SR57 and 60) in the study area and related

## 2. Response to Comments

impacts on the local roadway system as a result of increased congestion on the freeways were adequately analyzed (see detailed analysis provided under Impact 5.13-1, pages 5.13-29 through 5.13-86) and mitigated for (see Mitigation Measures 13-2 and 13-3) in Chapter 5.13, *Transportation and Traffic*, of the DEIR. See responses to Comments AO7-1 and AO7-2 regarding traffic/transportation impacts on roadways in the City of Diamond Bar.

It should also be noted that the 2004 and 2008 IBC EIRs and their associated traffic studies included a detailed analysis of freeway mainline segments and on-/off-ramp intersections (including those of SR57 and 60) that would be impacted by the IBC plan of developments considered in each EIR. All necessary freeway improvements as a result of implementation of either IBC plan of development were outlined as mitigation measures in the 2004 and 2008 IBC EIRs.

AO7-5 Responses to individual lettered comments are provided below.

a. See response to Comment AO7-1.

Additionally, it should be noted that the traffic/transportation impacts and mitigation measures tied to each IBC plan of development analyzed in the 2004 and 2008 IBC EIRs are separate and each plan would lead to distinct traffic/transportation impacts. Therefore, although the plan of development analyzed in the 2004 IBC EIR is considered the worst-case development traffic/transportation impact scenario, the traffic/transportation-related mitigation measures of the 2004 IBC EIR would not be applicable to or implemented under the plan of development analyzed in the 2008 IBC EIR, and vice versa. Additionally, the traffic/transportation-related mitigation measures outlined in the 2004 and 2008 IBC EIR's are not applicable to nor would they be implemented under the General Plan Update. Those traffic/transportation-related mitigation measures are tied to and would be implemented under the applicable plan of development implemented for the IBC site.

b. See responses to Comments AO7-1 and AO7-2.

c. See responses to Comments AO7-1, AO7-2, and AO7-6.

AO7-6 As noted in response to Comment AO7-1, per the CEQA Guidelines, the baseline is defined as the existing conditions at the time of release of the Notice of Preparation (NOP). The NOP for the General Plan Update DEIR was released on March 28, 2011. Therefore, the baseline for the General Plan Update DEIR (including analysis of traffic/transportation impacts) is existing conditions at the time the NOP was released on March 28, 2011. Therefore, in accordance with the CEQA Guidelines, the freeway traffic counts (existing and projected) and related impact analysis provided in the traffic study conducted for the General Plan Update (provided as appendix F to the DEIR)

## 2. Response to Comments

were based on existing conditions at the time the NOP was released, and not on existing traffic conditions as of today.

AO7-7 See response to Comment AO7-2.

AO7-8 The commenter stated that the assumed programmed transportation improvements must accurately reflect current plans for those improvements. The programmed transportation improvements outlined in the traffic study conducted for the General Plan Update (provided as appendix F to the DEIR) and outlined in Chapter 5.13, *Transportation and Traffic*, of the DEIR are accurate and adequate for the traffic/transportation impact analysis conducted in the traffic study, as they were based on the existing conditions (which included the proposed plans for the programmed transportation improvements) at the time the NOP was released.

Additionally, the commenter failed to provide information on/evidence of the “City of Diamond Bar project” noted in this comment. It is not known what project the commenter is referring to as no name or information was provided; therefore, no further response can be provided.

AO7-9 See responses to Comments AO7-1, AO7-2, AO7-5a, and AO7-8.

## 2. Response to Comments

LETTER AO8 – The Gas Company (1 page)



1919 S. State College Blvd.  
Anaheim, CA 92806-6114

A  Sempra Energy utility™

April 25, 2014

City of Industry  
15625 East Stafford, Ste. 100  
City of Industry, CA 91744

Attn: Brian James

**Subject: Environmental Impact Report for City of Industry General Plan Update; IND-09.1L**

Thank you for providing the opportunity to respond to this E.I.R. Document. We are pleased to inform you that Southern California Gas Company has facilities in the area where the aforementioned project is proposed. Gas service to the project can be provided from an existing gas main located in various locations. The service will be in accordance with the Company's policies and extension rules on file with the California Public Utilities Commission when the contractual arrangements are made.

This letter is not a contractual commitment to serve the proposed project but is only provided as an informational service. The availability of natural gas service is based upon conditions of gas supply and regulatory agencies. As a Public Utility, Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. Our ability to serve can also be affected by actions of federal regulatory agencies. Should these agencies take any action, which affect gas supply or the conditions under which service is available, gas service will be provided in accordance with the revised conditions.

A08-1

This letter is also provided without considering any conditions or non-utility laws and regulations (such as environmental regulations), which could affect construction of a main and/or service line extension (i.e., if hazardous wastes were encountered in the process of installing the line). The regulations can only be determined around the time contractual arrangements are made and construction has begun.

Estimates of gas usage for residential and non-residential projects are developed on an individual basis and are obtained from the Commercial-Industrial/Residential Market Services Staff by calling (800) 427-2000 (Commercial/Industrial Customers) (800) 427-2200 (Residential Customers). We have developed several programs, which are available upon request to provide assistance in selecting the most energy efficient appliances or systems for a particular project. If you desire further information on any of our energy conservation programs, please contact this office for assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Armando Torrez".

Armando Torrez  
Planning Supervisor  
SouthEast Region - Anaheim Planning & Engineering

AT/ps  
EIR.doc

## 2. Response to Comments

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## 2. Response to Comments

**A08. Response to Comments from The Gas Company, Armando Torrez, Planning Supervisor, dated April 25, 2014.**

AO8-1 The commenter stated that The Gas Company has facilities in the project area to serve future development that would be accommodated by the General Plan Update. The commenter also stated that the comment letter is not a formal commitment to provide service and that the availability of natural gas is based on conditions of gas supply and regulatory agencies. The comment is acknowledged and no further response is necessary.

## 2. Response to Comments

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# 3. Revisions to the Draft EIR

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## 3.1 INTRODUCTION

This section contains revisions to the DEIR based on (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; (3) minor revisions to the text of the General Plan Update; and (4) typographical errors. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

## 3.2 DEIR REVISIONS

The following text of the DEIR has been revised.

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Page 3-1, Chapter 3, *Project Description*. The following text has been modified to reflect minor changes in the General Plan Update document.

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## 3.2 Statement of Objectives

The following vision statement and objectives have been established for the City of Industry General Plan Update and will aid decision makers in their review of the project and associated environmental impacts:

- Provide prudent public ownership, ~~and timely disposition of,~~ improvement, and strategic ~~properties~~ partnership to achieve the City's economic development and revitalization goals.

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Page 3-26, Table 3-6, *General Plan Policies*, Chapter 3, *Project Description*. The following text has been modified to reflect minor changes in the General Plan Update document.

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**Table 3-6 General Plan Policies**

Policy No.	Policies
<b>Circulation Element</b>	
C2-1	Maintain a multimodal system of <u>sidewalks and</u> trails that connect businesses, schools, and other key destination points.
C2-2	Provide and designate <del>off-street</del> multipurpose sidewalks and trails <del>as the primary paths of</del> <u>for</u> bicycle travel.

### 3. Revisions to the Draft EIR

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Page 5.8-5, Section 5.8, *Hydrology and Water Quality*. The following text has been modified in response to Comments AO3-1 and AO3-2 from Juan M. Sarda of the County of Los Angeles Department of Public Works.

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#### Local Drainage

The primary drainage infrastructure for managing flooding and stormwater in and around the City is maintained by the ~~Sanitation Districts of Los Angeles County (LACSD)~~ Los Angeles County Flood Control District (LACFCD) and is shown in Figure 5.8-2, *Stormwater Drainage System*. It should be noted that not all of the drainage infrastructure improvements shown in Figure 5.8-2 are maintained by LACFCD; some are maintained by the City. The figure simply illustrates the overall drainage infrastructure of the City. It consists of underground storm pipes and drains that empty into mostly structured tributaries of the San Gabriel River. Shown in the figure are the main, named tributaries that have not been completely enclosed for their entire length. The primary receiving body for stormwater in Industry is San Jose Creek, which is a fully-lined, open-concrete channel for most of its length. The other flood control structures shown may have a combination of sand, natural, or concrete bottoms and rip-rap or concrete sides.

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Page 5.8-19, Section 5.8, *Hydrology and Water Quality*. The following text has been modified to correct some minor errors.

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#### General Construction Permit

Pursuant to the CWA Section 402(p) requiring regulations for permitting of certain stormwater discharges, SWRCB issued a statewide general NPDES permit and Waste Discharge Requirements (WDRs) for stormwater discharges from construction sites. ~~The General Construction Permit (GCP), WDRs Order No. 2009-0009-DWQ and NPDES Permit No. CAS000002 was adopted by the SWRCB on September 2, 2009, and became effective July 1, 2010. The Construction General Permit (CGP; Order No. 2012-0006-DWQ) was adopted and issued by SWRCB on July 17, 2012. The newly adopted GCP CGP supersedes Order 99-08-DWQ 2009-0009-DWQ and is required to be enforced by each local RWQCB unless the local RWQCB issues its own GCP CGP, which it may choose to do.~~

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Page 5.8-20, Section 5.8, *Hydrology and Water Quality*. The following text has been modified to correct some minor errors.

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#### Industrial Stormwater Permit

Pursuant to the CWA Section 402(p), SWRCB issued a statewide general NPDES permit and WDRs for stormwater associated with industrial activities. The Industrial Stormwater General Permit (ISGP) is implemented under WDRs Order No. 97-03-DWQ and NPDES Permit No. CAS000001. Coverage under the ISGP is based on a facility's Standard Industrial Classification (SIC)(replaced by North American Industrial Classification System). Facilities requiring coverage include (specific SICs are included in Attachment 1 of the ISGP):

### 3. Revisions to the Draft EIR

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Page 5.8-21, Section 5.8, *Hydrology and Water Quality*. The following text has been modified in response to Comment AO3-3 from Juan M. Sarda of the County of Los Angeles Department of Public Works.

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#### **Municipal Stormwater Permit (MS4 Permit)**

~~In December of 2001, LARWQCB issued an MS4 permit (No. CAS6118036) under Order No. 01-182 to the County of Los Angeles and its 84 co-permittees within the Los Angeles region, which includes the City. Waste discharge requirements for discharges to municipal storm drain systems in the LARWQCB region, which includes the City of Industry, are set forth in LARWQCB's Order No. R4-2012-0175 (National Pollution Discharge Elimination System [NPDES] Permit No. CAS004001), Waste Discharge Requirements for Municipal Storm Water System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except those Discharges Originating from the City of Long Beach (also known as the MS4 Permit), which was adopted by LARWQCB on November 8, 2012 and became effective December 28, 2012. The MS4 pPermit designates the LACFCD as the Principal Permittee, and the County of Los Angeles Department of Public Works, and 84 incorporated cities are designated as Permittees. The Principal Permittees coordinates and facilitates activities necessary to comply with the requirements of the MS4 pPermit, but is not and are responsible for ensuring the compliance of any Permittee with the MS4 Permit.~~

Whereas the GCP is issued statewide, MS4 permits are issued by local RWQCBs in order to provide the means to address stormwater quality issues specific to the local watershed or region. As a result, MS4 permits are a more prescriptive level of regulation, requiring permittees to develop and implement a stormwater management program with the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). The MEP standard is a more stringent performance standard than the BAT/BCT standards established for the GCP. The stormwater management program or Municipal Storm Water Management Program, as it is referred to in the Los Angeles region, must specify LARWQCB-approved BMPs to address the following program areas: public education and outreach, illicit discharge detection and elimination, construction and postconstruction, and good housekeeping for municipal operations.

~~Pursuant to the Los Angeles County MS4 permit, the county and individual cities are responsible for controlling or limiting urban pollutants generated by construction and postconstruction activities from reaching their MS4s.~~

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Page 5.8-26, Section 5.8, *Hydrology and Water Quality*. The following text has been modified to correct some minor errors.

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All future construction projects of one acre or more would be required to comply with the Statewide ~~GCP~~ CGP, Order No. 2012-0006-DWQ WDRs Order No. 2009-0009-DWQ and NPDES Permit No. CAS000002. Under the ~~GCP~~ CGP, proponents of sites of one acre or greater are required to either obtain individual NPDES permits for stormwater discharges or be covered by the ~~GCP~~ CGP. NPDES permits for discharges of stormwater from construction sites require that each applicant under the ~~GCP~~ CGP develop a SWPPP prior to grading activities and implement the SWPPP during construction. The primary objective of the SWPPP is to identify, construct, implement, and maintain BMPs to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site.

### 3. Revisions to the Draft EIR

Projects approved and/or implemented under General Plan Update would also be required to control pollutants in discharges of stormwater from postconstruction activities under Los Angeles County’s MS4 permit (No. ~~CAS6418036~~CAS004001). Additionally, certain industrial activities (specific SICs are included in Attachment 1 of the ISGP) would require coverage under the ISGP, which is implemented under WDRs Order No. 97-03-DWQ and NPDES Permit No. CAS000001. Each permittee is required to prepare and implement a SWPPP, which outlines BMPs to reduce or prevent pollutants in stormwater discharges and authorized non-stormwater discharges.

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Page 5.8-34, Section 5.8, *Hydrology and Water Quality*. The following text has been modified to correct some minor errors.

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#### 5.8.5 Existing Regulations

##### State and Local

- ~~General Construction Permit~~ Construction General Permit, implemented under ~~WDRs Order No. 2009-0009 DWQ and NPDES Permit No. CAS000002~~ Order No. 2012-0006-DWQ
- Industrial Stormwater General Permit, implemented under WDRs Order No. 97-03-DWQ and NPDES Permit No. CAS000001
- Los Angeles County MS4 permit (No. ~~CAS6418036~~ CAS004001) under Order No. ~~04-182~~ R4-2012-0175

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Page 5.8-29, Section 5.8, *Hydrology and Water Quality*. The following text has been modified in response to Comments AO3-1 and AO3-4 from Juan M. Sarda of the County of Los Angeles Department of Public Works.

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***Impact 5.8-3: Future development that would be accommodated by the General Plan Update would increase the amount of impervious surfaces in the city and would therefore increase surface-water flows into drainage systems within the San Gabriel River Watershed. [Thresholds HYD-3, HYD-4, and HYD-5]***

***Impact Analysis:*** Future development in the City pursuant to the General Plan Update may cause changes to the existing drainage patterns, increase the amount of impervious surface, or lead to the creation of substantial erosion, siltation or flooding. In areas that are currently undeveloped in the City, such as the few vacant scattered lots that remain and the vacant IBC site in the eastern end of the City, there is potential for drainages and/or drainage patterns to be altered.

However, in most developed areas—which consist of the majority of the City—stormwater drainage and runoff would flow within the City’s existing stormwater drainage systems. The primary drainage infrastructure for managing flooding, stormwater and runoff in and around the City is maintained by ~~LACSD~~ LACFCD and is shown in Figure 5.8-2, *Stormwater Drainage System*. It should be noted that not all of the drainage infrastructure improvements shown in Figure 5.8-2 are maintained by LACFCD; some are maintained by the City. The figure simply illustrates the overall drainage infrastructure of the City. Future

### 3. Revisions to the Draft EIR

development projects considered for approval under the General Plan Update would also have to meet the following requirements for limiting impacts to the existing drainage system and to minimize impacts related to erosion, siltation, or flooding.

- Preparation of project-specific hydrology studies estimating project impacts on drainage in accordance with procedures outlined in the County of Los Angeles' Manual for the Standard Urban Stormwater Mitigation Plan.
- Implementation of BMPs to minimize runoff and provide for infiltration of stormwater into the soil onsite in accordance with the County of Los Angeles' Manual for the Standard Urban Stormwater Mitigation Plan.

Additionally, any future storm drain system(s) that would need to be transferred to LACFCD for operation and maintenance would be required to be designed, permitted, and constructed to the satisfaction of both the City Engineer and LACFCD.

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Page 5.9-34, Section 5.9, *Land Use and Planning*. The following text has been modified to reflect minor changes to the General Plan Update document.

- Maintain a multimodal system of sidewalks and trails that connect businesses, schools, and other key destination points (C2-1).
- Provide and designate off-street multipurpose sidewalks and trails ~~as the primary paths of~~ for bicycle travel (C2-2).

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Page 5.13-90, Section 5.13, *Transportation and Traffic*. The following text has been modified to reflect minor changes to the General Plan Update document.

#### **Bicycle and Pedestrian Facilities**

Due to the amount and type of vehicle trips (large trucks) and existing lane widths, the City ~~considers~~ generally does not encourage bicycle travel on its roadways ~~to be unsafe~~. While bicycle travel on roadways is not prohibited, it is discouraged for safety reasons. However, the City does have a sidewalk system that provides access to nearly all areas of the City. Section 21100(h) of the California Vehicle Code allows bicycles to ride on sidewalks and allows cities to adopt tailored rules that address bicycling on public sidewalks. ~~Given that~~ Because there is limited pedestrian traffic on the City's sidewalks ~~and there are no areas where pedestrians dominate sidewalk traffic,~~ potential conflicts between pedestrians and bicyclists ~~are~~ would be minimal. The City accommodates bicycle and pedestrian travel on the following systems, as shown in Figure 5.13-7, *Bicycle and Pedestrian Plan*:

- ***Multipurpose Sidewalks.*** ~~All~~ A comprehensive system of sidewalks in the City ~~that~~ accommodate both pedestrian and bicycle travel and provide connections throughout the City.

### 3. Revisions to the Draft EIR

- **Multipurpose Trails (Class I).** Paved facilities designated for pedestrian and bicycle use that are physically separated from roadways.
- **Bike Lanes (Class II).** Lanes on the outside edge of roadways reserved for the exclusive use of bicycles and designated with special signing and pavement markings.
- **Bike Routes (Class III).** Bicycle travel that is accommodated on ~~the~~ designated streets and sidewalks ~~designated with signs in areas of limited vehicular and truck traffic and constrained sidewalks in order to provide a link in a system.~~

Of the various forms of nonmotorized transportation outlined above, multipurpose sidewalks are the primary paths of pedestrian and bicycle travel in the City.

Additionally, as shown in Figure 5.13-7, the City identifies a conceptual route for a proposed multipurpose corridor that could accommodate multiple users, including a truck-bypass and multipurpose trails along the existing channelized San Jose Creek, in addition to the existing creek. This classification indicates the conceptual location for the corridor and indicates the City's acknowledgement of plans proposed by others.

Furthermore, there are segments of the County of Los Angeles regional trails existing within the City including the San Gabriel River Trail, San Jose Creek Trail, which exists between the San Gabriel River and 7th Street, and the Schabarum-Skyline Trail, which is partially completed near Ajax Avenue and crossing under Workman Mill Road (see Figure 5.13-7).

Finally, under the policies of the Circulation Element, the City would take the following actions to ensure that adequate modes of nonmotorized transportation continue to be provided and expanded, where feasible and necessary, throughout the City:

- Maintain a multimodal system of sidewalks and trails that connect businesses, schools, and other key destination points (C2-1).
- Provide and designate ~~off-street~~ multipurpose sidewalks and trails ~~as the primary paths of~~ for bicycle travel (C2-2).

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Page 5.13-92, Section 5.13, *Transportation and Traffic*. The following text has been modified to reflect minor changes to the General Plan Update document.

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- Maintain a multimodal system of sidewalks and trails that connect businesses, schools, and other key destination points (C2-1).
- Provide and designate off-street multipurpose sidewalks and trails ~~as the primary paths of~~ for bicycle travel (C2-2).

### 3. Revisions to the Draft EIR

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Pages 5.14-16 and 5.14-19, Section 5.14, *Utilities and Service Systems*. The following text has been modified in response to Comment AO4-3 and to correct some minor errors.

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#### Wastewater Treatment and Collection

Wastewater treatment for the City is provided through LACSD, whose purpose is to construct, operate, and maintain facilities that collect, treat, recycle, and dispose of domestic and industrial wastewater. There are ~~24~~ 23 independent special districts serving Los Angeles County, with the City located in portions of Districts 15, 18, and 21. Individual districts operate and maintain their own portions of the collection system. Within these districts, cities are responsible for collection of wastewater through local lines, which feed to major trunk lines that vary from 8 inches to 144 inches in diameter. ~~The boundaries of these districts and the~~ size and location of major wastewater lines in the City are shown in Figure 5.14-2, *Wastewater Treatment System*. Nearly 62 miles of trunk lines serve the City.

~~Seventeen of the 23 sanitation districts (Nos. 1, 2, 3, 5, 8, 15, 16, 17, 18, 19, 21, 22, 23, 28, 29, and 34 and South Bay Cities, which are known collectively as the Joint Outfall Districts [JOD]), including those that cover Industry, are served by a regional, interconnected system of wastewater conveyance and treatment facilities known as the Joint Outfall System (JOS). The 17 sanitation districts are signatory to the Joint Outfall Agreement (JOA), an agreement that provides for collective ownership and operation of shared wastewater conveyance, treatment, and disposal facilities. The JOS provides wastewater treatment and disposal service for residential, commercial, and industrial users. It currently consists of seven wastewater treatment plants, more than 509 miles of trunk sewers, and 12 pumping plants. In addition to the collectively-owned facilities, the individual districts own a combined total of 745 miles of sewers and 36 pumping plants. The JOS operates upstream water reclamation plants (WRP) for recycled water and a downstream Joint Water Pollution Control Plant (JWPCP) that treats wastewater with a higher industrial contribution and the solids that are removed at the upstream plants. The WRPs, located upstream of the JWPCP, provide hydraulic relief of the downstream conveyance, treatment, and disposal system. The water reclaimed at these plants is either utilized for beneficial reuse or discharged to the San Gabriel River, Rio Hondo River, or their tributaries, all of which eventually flow to the Pacific Ocean (LACSD 2014).~~

Wastewater generated in the City is treated at one or more of the following wastewater treatment facilities, which are owned, operated, and maintained by LACSD: San Jose Creek WRP located in the western boundary of the City (see Figure 5.14-2), which has a design capacity of 100 million gallons per day (mgd) and currently (as of April 2014) processes an average flow of 73.7 mgd; the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a design capacity of 400 mgd and currently (as of April 2014) processes an average flow of 263.7 mgd; and/or the Los Coyotes WRP located in the City of Cerritos, which has a design capacity of 37.5 mgd and currently (as of April 2014) processes an average flow of 21.2 mgd (LACSD 2014). The San Jose Creek WRP, which serves the City, is located on the western boundary of Industry, as shown in Figure 5.14-2. The San Jose Creek WRP is the largest of the water reclamation plants with a treatment capacity of 100 million gallons per day (mgd); average daily flows in September 2011 were 75.2 mgd (Raza 2012). It ~~The San Jose Creek WRP, the largest of the wastewater treatment facilities,~~ provides primary, secondary, and tertiary treatment that yields at least 35 mgd of purified (recycled) water, some of which is available for use within Industry.

### 3. Revisions to the Draft EIR

Page 5.14-22, Table 5.14-6, *Estimated Net Change in Wastewater Generation due to Theoretical Buildout of the General Plan Update*, Section 5.14, *Utilities and Service Systems*. The following text has been modified in response to Comments AO4-3 and AO4-4 and to correct some minor errors.

#### Wastewater Generation

Estimated wastewater generation in accordance with theoretical buildout of the General Plan Update is shown in Table 5.14-6. As shown in this table, estimated wastewater generation would increase by a net of approximately 277,417 gallons per day. The wastewater generation rates by land used provided in Table 5.14-6 are based on rates from three different agencies, as noted in the footnotes of the table. Where generation rates from LACSD were not available or applicable for a specific land use, rates from the City of Los Angeles or Orange County Sanitation District were used.

**Table 5.14-6  
Estimated Net Change in Wastewater Generation  
due to Theoretical Buildout of the General Plan Update**

Land Use	Units	Quantity			Water Demand Wastewater Generation (gallons per day)	
		Existing Land Uses	Proposed Land Use Plan	Net Increase/Decrease	Per Unit <sup>†</sup>	Total
Retail, Big Box Retail, and Auto Dealers	Square Feet	9,168,015	10,528,937	1,360,923	0.15 <sup>1</sup>	204,138
Office	Square Feet	1,638,311	2,040,199	251,606	0.2 <sup>1</sup>	50,321
Manufacturing, Assembly, Light Industrial, and Multiple Use	Square Feet	29,451,871	34,900,073	5,448,202	0.025 <sup>1</sup>	136,205
Warehousing and Distribution	Square Feet	54,856,955	58,680,240	3,823,285	0.025 <sup>1</sup>	95,582
Open Storage and Commercial Storage	Square Feet	511,450	342,301	-169,149	0.025 <sup>1</sup>	-4,229
Hotels and Motels	Square Feet	661,263	661,263	0	0.2 <sup>2</sup>	0
Residential	Dwelling Units	59	59	0	260 <sup>1</sup>	0
Schools	Acres	87.2	87.2	0	2,715 <sup>2</sup>	0
Public Facilities, Museums, and Religious Facilities	Acres	100	17	-83	2,715 <sup>2</sup>	-225,345
Special Uses and Nursing Home	Acres	10	6	-4	2,715 <sup>2</sup>	-10,860
Commercial Recreation <sup>2</sup>	Acres	386	395	9	129 <sup>2</sup>	1,161
Parks and Open Space <sup>2</sup>	Acres	0	236	236	129 <sup>2</sup>	30,444
Waterways and Flood Control Channels	Acres	288	306	18	0	0
Railroads, utilities, and transportation/communication	Acres	652	593	-59	0	0
Roads	Acres	800	800	0	0	0
<b>Total</b>	—	—	—	—	—	<b>277,417</b>

### 3. Revisions to the Draft EIR

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<sup>1</sup> Wastewater generation rates for lands uses in square feet and dwelling units are from Table 1 (Loadings for Each Class of Land Use) of the Los Angeles County Sanitation District (LACSD 2014).

<sup>42</sup> Wastewater generation rates for land uses in square feet and dwelling units are from City of Los Angeles 2006; generation rates for land uses in acres are from Orange County Sanitation District.

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As stated earlier, the San Jose Creek WRP, which serves the City, is the largest of the water reclamation plants with a treatment capacity of 100 mgd; average daily flows in September 2011 were 75.2 mgd (Raza 2012). As noted earlier, the San Jose Creek WRP has a design capacity of 100 mgd and currently (as of April 2014) processes an average flow of 73.7 mgd; JWPCP has a design capacity of 400 mgd and currently (as of April 2014) processes an average flow of 263.7 mgd; and Los Coyotes WRP has a design capacity of 37.5 mgd and currently (as of April 2014) processes an average flow of 21.2 mgd. Combined, the remaining capacity of the three wastewater treatment facilities is 178.9 mgd. The additional 277,417 gallons per day of wastewater that would be generated by future development that would be accommodated by the General Plan Update represents less than one percent (approximately .15 percent) of the remaining capacity of these wastewater treatment facilities. Therefore, there is sufficient existing wastewater treatment capacity in the region for the estimated net increase in wastewater that would be generated by theoretical buildout of the General Plan Update.

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Page 5.14-23, Section 5.14, *Utilities and Service Systems*. The following text has been modified to correct some minor errors.

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**Impact Analysis:** Future development projects that would be accommodated by the General Plan Update would be required to prepare and implement SUSMPs in compliance with requirements of the MS4 Permit issued by the Los Angeles RWQCB. Construction projects of one acre or more in area developed pursuant to the General Plan Update would be required prepare and implement Stormwater Pollution Prevention Plans in accordance with the requirements of General Construction Permit, Order No. ~~2009-0009-DWQ~~ 2012-0006-DWQ. New or expanded industrial operations in the City developed pursuant to the General Plan Update would be required to comply with the LACSD Industrial Wastewater Discharge Permit program.

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Page 5.13.6, Chapter 13, *Bibliography*. The following reference has been provided in response to Comment AO-3.

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## 13.2 Websites

Los Angeles County Sanitation Districts (LACSD). 2014. Joint Outfall System.  
[http://www.lacsd.org/wastewater/wastewater\\_services/proposition\\_218/facilities.asp](http://www.lacsd.org/wastewater/wastewater_services/proposition_218/facilities.asp).

\_\_\_\_\_. 2014. Will Serve Program: Table 1, Loadings for Each Class of Land Use.  
<http://www.lacsd.org/wastewater/willserveprogram.asp>

### 3. Revisions to the Draft EIR

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