



FINAL

# ENVIRONMENTAL IMPACT REPORT

FOR THE

LAWNDALE GENERAL PLAN UPDATE  
(SCH: 2022120088)

OCTOBER 2023

*Prepared for:*

City of Lawndale  
Community Development Department  
14717 Burin Avenue  
Lawndale, CA 90260

*Prepared by:*

De Novo Planning Group  
180 East Main Street, Suite 108  
Tustin, CA 92780

D e N o v o P l a n n i n g G r o u p

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A Land Use Planning, Design, and Environmental Firm





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*Prepared for:*

City of Lawndale  
Community Development Department  
14717 Burin Avenue  
Lawndale, CA 90260  
JChavez@lawndalecity.org  
310-973-3206

*Prepared by:*

De Novo Planning Group  
180 East Main Street, Suite 108  
Tustin, CA 92780





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## 1.0 INTRODUCTION

This Final Environmental Impact Report (Final EIR or FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Lawndale is the lead agency for the environmental review of the City of Lawndale General Plan Update (General Plan, General Plan Update, or Project) and has the principal responsibility for approving the Project. This Final EIR assesses the expected environmental impacts resulting from approval and adoption of the General Plan Update and responds to comments received on the Draft EIR.

The Lawndale General Plan is the overarching policy document that guides land use, housing, transportation, open space, public safety, community services, and other policy decisions throughout the City of Lawndale and the Sphere of Influence (collectively referred to as the Planning Area). The General Plan includes the eight elements mandated by State law, to the extent that they are relevant locally, including: land use, circulation, housing, conservation, open space, noise, environmental justice, and safety elements. The City has chosen to combine the topics of Conservation and Open Space into one Element: Resource Management. The topic of Noise is included in the Public Safety Element. General plans must also address the topics of climate change and resiliency planning, either as separate elements or as part of other required elements. At the discretion of each jurisdiction, the general plan may combine these elements and may add optional elements relevant to the physical features of the jurisdiction. The City may also address other topics of interest; this General Plan includes elements related to Economic Development and Community Facilities. The General Plan Update sets out the goals, policies, and actions in each of these areas, serves as a policy guide for how the City will make key planning decisions in the future, and guides how the City will interact with the broader Los Angeles County, surrounding cities, and other local, regional, State, and Federal agencies.

The General Plan Update contains the goals and policies that will guide future decisions within the Planning Area. It also identifies implementation programs, in the form of actions, that will ensure the goals and policies in the General Plan Update are carried out. As part of the General Plan Update, the City and the consultant team prepared several support documents that serve as the building blocks for the General Plan Update and analyze the environmental impacts associated with implementing the General Plan Update.

Refer to Section 3.0, *Project Description* of the Draft EIR for a more comprehensive description of the details of the proposed Project.

### 1.1 PURPOSE AND INTENDED USES OF THE EIR

#### CEQA REQUIREMENTS FOR A FINAL EIR

This Final EIR for the Lawndale General Plan Update has been prepared in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that a Final EIR consist of the following:

- The Draft Environmental Impact Report (Draft EIR) or a revision of the draft;
- Comments and recommendations received on the Draft EIR, either verbatim or in summary;



- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- Any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR is incorporated by reference into this Final EIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed projects, and obligates them to balance a variety of public objectives, including economic, environmental, and social factors.

## PURPOSE AND USE

The City of Lawndale, as the lead agency, has prepared this EIR to provide the public and responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from adoption of the General Plan Update and subsequent implementation of projects consistent with the General Plan Update. The environmental review process enables interested parties to evaluate the proposed Project in terms of its environmental consequences, to examine and recommend methods to eliminate or reduce potential adverse impacts, and to consider a reasonable range of alternatives to the project. While CEQA requires that consideration be given to avoiding adverse environmental effects, the lead agency must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This EIR will be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with the General Plan Update. This EIR may also be used by other agencies within Los Angeles County. Responsible and trustee agencies that may use the EIR are identified in Section 2.0, *Introduction and Purpose* of the Draft EIR.

## 1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

### NOTICE OF PREPARATION

The City of Lawndale circulated a Notice of Preparation (NOP) of an EIR for the Project on December 6, 2022 to trustee and responsible agencies, the State Clearinghouse, and the public. A scoping meeting was held on December 15, 2022 at 6:30 p.m. at the Harold E. Hofmann Community Center located at 14700 Burin Avenue in the City of Lawndale. No public or agency comments on the NOP related to the EIR analysis were presented or submitted during the scoping meeting. During the 30-day public review period for the NOP, which ended on January 5, 2023, four written comment letters were received on the NOP. A summary of the NOP comments is provided in Section 2.8 of the Draft EIR. The NOP and all comments received on the NOP are presented in Appendix A of the Draft EIR.





## NOTICE OF AVAILABILITY AND DRAFT EIR

The City of Lawndale published a public Notice of Availability (NOA) for the Draft EIR on August 15, 2023, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2022120088) and was published in the *Daily Breeze* pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from August 15, 2023 through October 2, 2023. The Public Draft General Plan Update was also available for public review and comment during this time period.

The Draft EIR contains a description of the Project, description of the environmental setting, identification of the Project's direct and indirect impacts on the environment and General Plan policies and actions to reduce impacts to the extent feasible, as well as an analysis of Project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

## RESPONSE TO COMMENTS/FINAL EIR

The City of Lawndale received seven comment letters regarding the Draft General Plan and Draft EIR from public agencies, organizations, and members of the public during the 45-day review period.

In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written comments received on the Draft EIR. This document and the Draft EIR, as amended herein, constitute the Final EIR.

## CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The Lawndale City Council will review and consider the Final EIR. If the City Council finds that the Final EIR is "adequate and complete," then it may certify it in accordance with CEQA. The rule of adequacy generally holds that an EIR can be certified if:

- 1) The EIR shows a good faith effort at full disclosure of environmental information; and
- 2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of environmental considerations.

Upon review and consideration of the Final EIR, the Lawndale City Council may take action to approve, revise, or reject the Project. A decision to approve the Lawndale General Plan Update, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093.

Policies and actions to mitigate potential environmental impacts have been incorporated into the Project, to the extent feasible. No additional mitigation is feasible or available, as described in Sections 5.1 through 6.0 of the Draft EIR. The annual report on general plan status required pursuant to the Government Code will serve as the monitoring and reporting program for the Project.



### 1.3 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

#### SECTION 1.0 – INTRODUCTION

Section 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

#### SECTION 2.0 – COMMENTS ON DRAFT EIR AND RESPONSES

Section 2.0 provides a list of commenters, copies of written comments made on the Draft EIR (coded for reference), and responses to those written comments



## 2.0 COMMENTS ON DRAFT EIR AND RESPONSES

### 2.1 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15088, the City of Lawndale, as the lead agency, has evaluated the comments received on the Public Review Draft Lawndale General Plan Update Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2022120088).

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*

Section 2.0 of this Final EIR include information that has been added to the EIR since the close of the public review period in the form of responses to comments and/or errata. As noted below, no new significant information was provided on the Draft EIR during the comment period.

### 2.2 LIST OF COMMENTERS

Table 2-1 lists the comments on the Draft EIR that were submitted to the City during the 45-day public review period. The assigned comment letter, letter author, affiliation, if presented in the comment letter or if representing a public agency, and letter date are also listed.

**Table 2-1**  
**List of Commenters**

Response Letter	Individual or Signatory	Affiliation	Date
A	rh@jyrq.com	N/A	8/21/2023
B	Andrew Salas	Gabrieleno Band of Mission Indians – Kizh Nation	8/22/2023
C	Constantin Raether	California Governor’s Office of Emergency Services	8/23/2023
D	Sahar Ghadimi	South Coast Air Quality Management District	8/25/2023
E	Ronald M. Durbin	County of Los Angeles Fire Department	9/1/2023
F	Andrew Salas	Gabrieleno Band of Mission Indians – Kizh Nation	9/28/2023
G	Miya Edmonson	State of California Department of Transportation	9/29/2023

### 2.3 COMMENTS AND RESPONSES

#### REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and be detailed, especially when specific comments or suggestions (e.g.,



additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies only need to respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204(a)).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR.

## RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- a) Each comment letter is lettered (i.e., Letter A), each comment within each letter is numbered (i.e., A-1, A-2, etc.), and each response is numbered correspondingly (i.e., A-1, A-2, etc.).

# Comment Letter A

**From:** [Jared Chavez](#)  
**To:** [Ashley Brodtkin](#)  
**Subject:** FW: City of Lawndale General Plan Update: Notice of Availability of a Draft EIR  
**Date:** Wednesday, September 13, 2023 10:24:35 AM

---

Here is one

*Ms. Jared Chavez, Community Development Manager*

City of Lawndale, Community Development Department  
14717 Burin Avenue, Lawndale, CA 90260  
Phone: (310) 973-3231 / Fax: (310) 970-2183  
[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org) / [lawndalecity.org](http://lawndalecity.org)

---

**From:** rh@jyrq.com <rh@jyrq.com>  
**Sent:** Tuesday, August 29, 2023 1:04 PM  
**To:** Jared Chavez <jchavez@lawndalecity.org>  
**Cc:** Adrian Gutierrez <AGutierrez@lawndalecity.org>; Jose Hernandez <JHernandez@lawndalecity.org>  
**Subject:** RE: City of Lawndale General Plan Update: Notice of Availability of a Draft EIR

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks!

----- Original Message -----

On Tuesday, August 29th, 2023 at 12:16, Jared Chavez <[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)> wrote:

Hi yes you can look at it with this link :

[General Plan - City of Lawndale, CA \(lawndalecity.org\)](http://lawndalecity.org)

Thank you

*Ms. Jared Chavez, Community Development Manager*

City of Lawndale, Community Development Department  
14717 Burin Avenue, Lawndale, CA 90260  
Phone: (310) 973-3231 / Fax: (310) 970-2183  
[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org) / [lawndalecity.org](http://lawndalecity.org)

---

**From:** [rh@jyrq.com](mailto:rh@jyrq.com) <[rh@jyrq.com](mailto:rh@jyrq.com)>  
**Sent:** Monday, August 21, 2023 12:53 PM  
**To:** Jared Chavez <[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)>  
**Subject:** Re: City of Lawndale General Plan Update: Notice of Availability of a Draft EIR

---

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jared, could you please email me a copy of this document?

Thanks!

----- Original Message -----

On Tuesday, August 15th, 2023 at 07:20, [abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com)  
<[abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com)> wrote:

The City of Lawndale (City) is preparing a comprehensive update to its existing General Plan. The City of Lawndale has prepared an Environmental Impact Report (EIR) for the City of Lawndale General Plan Update (Project) to address the environmental impacts associated with the Project at a programmatic level. The proposed Project is a long-term plan consisting of policies that will guide future development activities and City actions. No specific development projects are proposed as part of this General Plan Update. However, the Program EIR can serve to streamline environmental review of future projects.

Members of the public and other interested agencies and individuals are invited to provide comments on the Lawndale General Plan Update and Draft EIR. Comments on the Lawndale General Plan Update and the Draft EIR can be provided in writing to the City at the address below, or by email to Jared Chavez, Community Development Manager at [jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org), during the 45-day public review period, starting on **August 2, 2023 and ending on October 2, 2023**. Comments in response to this notice must be submitted to the address below, or by email by the close of the Draft EIR public review period, which is 6:00 PM on Monday, October 2, 2023:

Jared Chavez - Community Development Manager  
City of Lawndale  
14717 Burin Ave.  
Lawndale, CA 90260  
Email: [jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)

Regards,

**Ashley Brodkin** | Senior Planner

De Novo Planning Group | [www.denovoplanning.com](http://www.denovoplanning.com)  
[abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com) | 714-440-0273

**Southern California** | 180 East Main St #108 | Tustin, CA 92780

**Northern California** | 1020 Suncast Ln #106 | El Dorado Hills, CA 95762

A-1



**Response to Comment Letter A**

rh@jyrq.com

N/A

August 21, 2023

A-1 The comment requests a copy of the Draft EIR. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

# Comment Letter B



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

August 22, 2022

Project Name: City of Lawndale General Plan

Thank you for your letter dated August 15, 2023. Regarding the project above. This is to concur that we agree with the General Plan Amendment. However, our Tribal government would like to request consultation for all future projects within this location.

**B-1**

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation

Andrew Salas, Chairman  
Albert Perez, treasurer I

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

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

PO Box 393 Covina, CA 91723

[www.gabrielenoindians@yahoo.com](mailto:www.gabrielenoindians@yahoo.com)

[gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com)





**Response to Comment Letter B**

Andrew Salas  
Gabrieleno Band of Mission Indians – Kizh Nation  
August 22, 2023

- B-1 The comment indicates that the Gabrieleno Band of Mission Indians – Kizh Nation does not have any comments on the Project; however, the Tribal government would like to request consultation for all future projects within the Lawndale General Plan Planning Area. Section 5.18, *Tribal Cultural Resources* of the Draft EIR addresses tribal cultural resources. As stated in Section 5.18 of the Draft EIR, the General Plan includes Policy RM-3.5, which requires consultation with Native American tribes that may be impacted by proposed development and land use policy changes, in accordance with State, local, and Tribal intergovernmental consultation requirements. Future projects within the Planning Area would be required to consult with Tribal Organizations, consistent with State law (i.e., AB 52 and SB 18). The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.

# Comment Letter C

**From:** [Jared Chavez](#)  
**To:** [Ashley Brodtkin](#)  
**Cc:** [Sean Moore](#)  
**Subject:** Fw: City of Lawndale Safety Element Update  
**Date:** Wednesday, August 23, 2023 1:45:50 PM

---

Hi Ashley,  
Please see the comments from Cal OES below.  
Thank you,

*Ms. Jared Chavez, Community Development Manager*

City of Lawndale, Community Development Department  
14717 Burin Avenue, Lawndale, CA 90260  
Phone: (310) 973-3231 / Fax: (310) 970-2183  
[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org) / [lawndalecity.org](http://lawndalecity.org)

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**From:** Raether, Constantin@CalOES <Constantin.Raether@CalOES.ca.gov>  
**Sent:** Wednesday, August 23, 2023 1:04 PM  
**To:** Jared Chavez <jchavez@lawndalecity.org>  
**Cc:** LaMar-Haas, Victoria@CalOES <Victoria.LaMar-Haas@CalOES.ca.gov>; Boemecke, Wendy@CalOES <Wendy.Boemecke@CalOES.ca.gov>; CalOES Mitigation Planning <mitigationplanning@caloes.ca.gov>  
**Subject:** City of Lawndale Safety Element Update

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Good day,

The California Governor's Office of Emergency Services (Cal OES) Local Hazard Mitigation Planning Team has taken the time to review the proposed updates/changes to your General Plan. Government Code 65302(g)(8) states "before preparing or revising its Safety Element, each city and county shall consult.... the Office of Emergency Services for the purpose of including information known by and available to the department."

The Cal OES Local Hazard Mitigation Planning Team reviews and compares your current Safety Element hazards against those listed in your most recent Federal Emergency Management Agency (FEMA) approved Local Hazard Mitigation Plan (LHMP).

Our office has reviewed your proposed Safety Element update posted on CEQA.net and found no substantive changes to your hazard profiles when compared against your most recent FEMA approved LHMP. Our office has no further comments at this time.

Should you need further assistance or have questions please email our team at [mitigationplanning@caloes.ca.gov](mailto:mitigationplanning@caloes.ca.gov).

**C-1**

**C-2**

Constantin Raether, Environmental Planner  
Local Mitigation Planning | Recovery Directorate  
California Governor's Office of Emergency Services



Office: (916) 328-7778  
Cell: (916) 715-9408  
[www.caloes.ca.gov/HMGP](http://www.caloes.ca.gov/HMGP)

**Constantin Raether**, Environmental Planner  
Local Mitigation Planning | Recovery Directorate  
**California Governor's Office of Emergency Services**



Office: (916) 328-7778  
Cell: (916) 715-9408  
[www.caloes.ca.gov/HMGP](http://www.caloes.ca.gov/HMGP)



**Response to Comment Letter C**

Constantin Raether  
California Governor’s Office of Emergency Services  
August 23, 2023

- C-1 These introductory paragraphs state that the California Governor’s Office of Emergency Services (Cal OES) has reviewed the proposed updates to the Lawndale General Plan. The comment references Government Code 65302(g)(8), which states “before preparing or revising its Safety Element, each city and county shall consult.... the Office of Emergency Services for the purpose of including information known by and available to the department.” The comment further states that Cal OES reviews and compares Safety Element hazards against those listed in the City’s most recent Federal Emergency Management Agency (FEMA) approved Local Hazard Mitigation Plan (LHMP). The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.
  
- C-2 The comment indicates that Cal OES has reviewed the City of Lawndale’s proposed Safety Element update and found no substantive changes to the City’s hazard profiles when compared against the City’s most recent FEMA approved LHMP. The comment indicates that Cal OES does not have any comments on the Project. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.

# Comment Letter D

**From:** [abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com)  
**To:** [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov); [swang1@aqmd.gov](mailto:swang1@aqmd.gov)  
**Cc:** "Jared Chavez"  
**Subject:** RE: Technical data request for the City of Lawndale General Plan Update Project.  
**Date:** Monday, August 28, 2023 9:48:32 AM  
**Attachments:** [CalEEMod\\_export\\_2023-07-12T01\\_01\\_16.540Z.json](#)

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Good morning,

In response to your request for an electronic copy of any live modeling and emission calculation files, please find attached the requested files for your review of the Lawndale General Plan Update EIR. The attached .json file is the CalEEMod model file (for the latest version of CalEEMod, 2022.1).

Please let me know if you need any additional information for your review.

Thank you,

**Ashley Brodkin** | Senior Planner

De Novo Planning Group | [www.denovoplanning.com](http://www.denovoplanning.com)

[abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com) | 714-440-0273

**Southern California** | 180 East Main St #108 | Tustin, CA 92780

**Northern California** | 1020 Suncast Ln #106 | El Dorado Hills, CA 95762

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**From:** Jared Chavez <[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)>  
**Sent:** Friday, August 25, 2023 1:19 PM  
**To:** Ashley Brodkin <[abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com)>  
**Cc:** Sean Moore <[SMoore@lawndalecity.org](mailto:SMoore@lawndalecity.org)>  
**Subject:** Fw: Technical data request for the City of Lawndale General Plan Update Project.

Hi Ashley please see comment below. They are requesting further documentation.

*Ms. Jared Chavez, Community Development Manager*

*City of Lawndale, Community Development Department*

*14717 Burin Avenue, Lawndale, CA 90260*

*Phone: (310) 973-3231 / Fax: (310) 970-2183*

*[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org) / [lawndalecity.org](http://lawndalecity.org)*

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**From:** Sahar Ghadimi <[sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov)>

**Sent:** Friday, August 25, 2023 9:44 AM

**To:** Jared Chavez <[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)>

**Cc:** Sam Wang <[swang1@aqmd.gov](mailto:swang1@aqmd.gov)>

**Subject:** Technical data request for the City of Lawndale General Plan Update Project.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Jared Chavez,

South Coast AQMD staff received the Draft Environmental Impact Report for the City of Lawndale General Plan Update Project (South Coast AQMD Control Number: LAC230823-11). Staff is currently in the process of reviewing the Draft Environmental Impact Report (DEIR).

**D-1**

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Dear Phayvanh Nanthavongdouangsy, Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e. truck operations).

**D-2**

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by the end of next week. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

Thank you.

Sincerely,

*Sahar Ghadimi*  
Air Quality Specialist, CEQA IGR  
Planning, Rule Development & Implementation  
South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765  
(909) 396-2392  
[sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov)

**From:** [Sahar Ghadimi](#)  
**To:** [abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com)  
**Cc:** ["Jared Chavez"](#)  
**Subject:** RE: [EXTERNAL]RE: Technical data request for the City of Lawndale General Plan Update Project.  
**Date:** Thursday, October 5, 2023 3:34:50 PM

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Dear Ashley,  
Thank you so much for your email.

After thorough review, we decided we do not need to provide any comment letter for the Lawndale General Plan Update Project.

Sincerely,

---

**From:** [abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com) <[abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com)>  
**Sent:** Thursday, October 5, 2023 10:00 AM  
**To:** Sahar Ghadimi <[sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov)>  
**Cc:** 'Jared Chavez' <[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)>  
**Subject:** [EXTERNAL]RE: Technical data request for the City of Lawndale General Plan Update Project.

Good morning,  
The public review period for the Lawndale General Plan Update Project Draft EIR closed on Monday, October 2. The City has begun preparing the Final EIR for the Project. As a commenter on the Project, we are providing you this notice. Please let me know if you have any questions.

Thank you,

**Ashley Brodkin** | Senior Planner  
De Novo Planning Group | [www.denovoplanning.com](http://www.denovoplanning.com)  
[abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com) | 714-440-0273  
**Southern California** | 180 East Main St #108 | Tustin, CA 92780  
**Northern California** | 1020 Suncast Ln #106 | El Dorado Hills, CA 95762

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**From:** Jared Chavez <[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)>  
**Sent:** Wednesday, September 13, 2023 10:31 AM  
**To:** 'Sahar Ghadimi' <[sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov)>  
**Cc:** Ashley Brodkin <[abrodkin@denovoplanning.com](mailto:abrodkin@denovoplanning.com)>; Adrian Gutierrez <[AGutierrez@lawndalecity.org](mailto:AGutierrez@lawndalecity.org)>  
**Subject:** RE: Technical data request for the City of Lawndale General Plan Update Project.

Good Morning,

We responded on 8/28. See attached email, let me know if you need anything else.  
Thank you,

*Ms. Jared Chavez, Community Development Manager*

City of Lawndale, Community Development Department

14717 Burin Avenue, Lawndale, CA 90260

Phone: (310) 973-3231 / Fax: (310) 970-2183

[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org) / [lawndalecity.org](http://lawndalecity.org)

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**From:** Sahar Ghadimi <[sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov)>

**Sent:** Wednesday, September 6, 2023 11:02 AM

**To:** Jared Chavez <[jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)>

**Subject:** RE: Technical data request for the City of Lawndale General Plan Update Project.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Jared Chavez,

I hope this email finds you well.

I wanted to follow up on my previous email on providing the technical data for the City of Lawndale General Plan Update Project.

Erly,

---

**From:** Sahar Ghadimi

**Sent:** Friday, August 25, 2023 9:44 AM

**To:** [jchavez@lawndalecity.org](mailto:jchavez@lawndalecity.org)

**Cc:** Sam Wang <[swang1@aqmd.gov](mailto:swang1@aqmd.gov)>

**Subject:** Technical data request for the City of Lawndale General Plan Update Project.

Dear Jared Chavez,

South Coast AQMD staff received the Draft Environmental Impact Report for the City of Lawndale General Plan Update Project (South Coast AQMD Control Number: LAC230823-11). Staff is currently in the process of reviewing the Draft Environmental Impact Report (DEIR).

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Dear Phayvanh Nanthavongdouangsy, Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e. truck operations).



You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by the end of next week. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

Thank you.

Sincerely,

*Sahar Ghadimi*  
Air Quality Specialist, CEQA IGR  
Planning, Rule Development & Implementation  
South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765  
(909) 396-2392  
[sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov)



**Response to Comment Letter D**

Sahar Ghadimi  
South Coast Air Quality Management District  
August 25, 2023

- D-1 This introductory paragraph states that the South Coast Air Quality Management District (AQMD) received and is in the process of reviewing the Draft EIR. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- D-2 This comment requests an electronic copy of any live modeling and emission calculation files that were used to quantify the air quality impacts from construction and/or operation of the Project. The comment further states that South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner without all files and supporting documentation. The comment is noted. A response to this comment was sent on August 28, 2023 and the requested files were provided to the South Coast AQMD. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- D-3 This comment states that the AQMD received the requested files and after a thorough review, does not have any comments on the Project. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.



ANTHONY C. MARRONE  
FIRE CHIEF  
FORESTER & FIRE WARDEN  
  
"Proud Protectors of Life,  
the Environment, and Property"

## COUNTY OF LOS ANGELES FIRE DEPARTMENT

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



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THIRD DISTRICT                      FIFTH DISTRICT

September 1, 2023

Jared Chavez  
14717 Burin Avenue  
Lawndale, CA 90260

Dear Mr. Chavez:

**THE DRAFT EIR GENERAL PLAN UPDATE, "CITY OF LAWDALE GENERAL PLAN UPDATE", PROPOSES TO GUIDE THE CITY'S DEVELOPMENT, GROWTH, AND CONSERVATION THROUGH LAND USE OBJECTIVES AND POLICY GUIDANCE, CITY OF LAWDALE, FFER2023004404**

The Draft EIR General Plan Update reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

**E-1**

The following are their comments:

### PLANNING DIVISION:

We have no comments.

**E-2**

For any questions regarding this response, please contact Kien Chin, at (323) 881-2404 or [Kien.Chin@fire.lacounty.gov](mailto:Kien.Chin@fire.lacounty.gov).

### LAND DEVELOPMENT UNIT:

All future development of within the City of Lawndale General Plan boundaries shall comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

**E-3**

When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage.

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

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

**LAND DEVELOPMENT UNIT:**

All future development of within the City of Lawndale General Plan boundaries shall comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage.

The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, you may contact the Land Development Unit at (323) 890-4243.

**E-4**

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance

The County of Los Angeles Fire Department, Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Matthew Ermino at (818) 890-5719.

**E-5**

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD Hazardous Materials Specialist III, Jennifer Levenson at (323) 890-4114 or [Jennifer.Levenson@fire.lacounty.gov](mailto:Jennifer.Levenson@fire.lacounty.gov) if you have any questions.

**E-6**

Very truly yours,



RONALD M. DURBIN, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

RMD:pg



**Response to Comment Letter E**

Ronald M. Durbin  
County of Los Angeles Fire Department  
September 1, 2023

- E-1 This introductory paragraph states that the Draft EIR was reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health and Hazardous Materials Division of the County of Los Angeles Fire Department. The comment is introductory in nature and does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- E-2 This comment states that the Planning Division of the County of Los Angeles Fire Department does not have any comments on the Project. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- E-3 These introductory paragraphs state that all future development within the City of Lawndale General Plan boundaries must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. The introductory paragraphs further state that when involved with subdivision in a City contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage. The comment is noted. Section 5.15, *Public Services* of the Draft EIR addresses fire protection and emergency services. As stated in Section 5.15 of the Draft EIR, the General Plan includes policies and actions that require all buildings and facilities in the City to comply with regulatory standards related to fire safety, including the Fire Code. The comment is introductory in nature and does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- E-4 This comment repeats the introductory paragraphs referenced above, which state that all future development within the City of Lawndale General Plan boundaries must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. The introductory paragraphs further state that when involved with subdivision in a City contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage. The comment is noted. Section 5.15, *Public Services* of the Draft EIR addresses fire protection and emergency services. As stated in Section 5.15 of the Draft EIR, the General Plan includes policies and actions that require all buildings and facilities in the City to comply with regulatory standards related to fire safety, including the Fire Code. The comment is introductory in nature and does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- E-5 This introductory paragraph states that the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. The comment states that the Forestry Division of the County of Los Angeles Fire Department does not



have any comments on the Project. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.

- E-6 This comment states that the Health Hazardous Materials Division of the County of Los Angeles Fire Department does not have any comments on the Project. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

# Comment Letter F



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

September 28, 2023

Project Name: City of Lawndale General Plan Update

Thank you for your letter dated August 15, 2023. Regarding the project above. This is to concur that we agree with the General Plan Amendment. However, our Tribal government would like to request consultation for all future projects within this location.

**F-1**

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation

Andrew Salas, Chairman  
Albert Perez, treasurer I

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

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

PO Box 393 Covina, CA 91723

[www.gabrielenoindians@yahoo.com](http://www.gabrielenoindians@yahoo.com)

[gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com)



**Response to Comment Letter F**

Andrew Salas  
Gabrieleno Band of Mission Indians – Kizh Nation  
September 28, 2023

- F-1 The comment indicates that the Gabrieleno Band of Mission Indians – Kizh Nation does not have any comments on the Project; however, the Tribal government would like to request consultation for all future projects within the Lawndale General Plan Planning Area. The comment does not contain any information requiring changes to the Draft EIR. Section 5.18, *Tribal Cultural Resources* of the Draft EIR addresses tribal cultural resources. As stated in Section 5.18 of the Draft EIR, the General Plan includes Policy RM-3.5, which requires consultation with Native American tribes that may be impacted by proposed development and land use policy changes, in accordance with State, local, and Tribal intergovernmental consultation requirements. Future projects within the Planning Area would be required to consult with Tribal Organizations, consistent with State law (i.e., AB 52 and SB 18). The comment is noted and no further response is warranted.



## DEPARTMENT OF TRANSPORTATION

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 269-1124  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life*

September 29, 2023

Jared Chavez  
Community Development Manager  
City of Lawndale  
14717 Burin Avenue  
Lawndale, CA 90260

RE: City of Lawndale General Plan Update  
SCH # 2022120088  
Vic. LA-405, LA-107. Citywide  
GTS # LA-2022-04292-DEIR

Dear Jared Chavez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The City of Lawndale is preparing a comprehensive update to its existing General Plan. The General Plan Update is intended to be an expression of the community's vision for the City and Planning Area and constitutes the policy and regulatory framework by which future development projects will be reviewed and public improvements will be implemented. The Lawndale General Plan Update includes a comprehensive set of goals, policies, and actions (implementation measures), organized into Elements, as well as a revised Land Use Map. The Lawndale General Plan will include all of the State-mandated elements, and will address two optional topics: Economic Development and Community Facilities.

**G-1**

On page 29 of Appendix F Transportation Impact Analysis, it indicates the following:

The OPR recommended thresholds for residential and office land uses as follows:

- Residential: A project exceeding a level of 15% below existing VMT per capita for the city or region may indicate a significant transportation impact.
- Office: A project exceeding a level of 15% below existing regional VMT per employee may indicate a significant transportation impact.

**G-2**

On page 35 of Appendix F Transportation Impact Analysis, it indicates the following:

Project Threshold: a significant impact would occur if the project's 2045 VMT per capita or VMT per employee exceeds 15 percent below the existing Los Angeles countywide average VM per capita, or VMT per employee, respectively.

OPR Technical Advisory states that **“OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold.”** A conservative approach to preparing a transportation analysis would result in providing substantial evidence to comply with CEQA. Therefore we recommend the City use lower VMT data, Lawndale 2023 Existing Conditions as a base instead of Los Angeles County 2023 Existing Conditions.

**G-2**

The transportation analysis should use the Lawndale 2023 Existing Conditions VMT Per Capita/VMT Per Employee as a base threshold while the City data is available. Therefore with 15% reduction, the reduced threshold should be 8.39 (9.87X85%) for VMT Per Capita and 13.82 (16.26X85%) for VMT Per Employee.

Based revised threshold, the Lawndale 2045 Project condition 9.19 VMT Per Capita and 14.78 VMT Per Employee exceeds the revised threshold above. Therefore, the transportation impact would be significant and mitigation would be required.

**G-3**

At this time, the project's impacts related to VMT would be significant and unavoidable because no mitigation is proposed. We would recommend the City to consider the following measures for this General Plan and for all future projects:

1. We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

**G-4**

<http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

2. For each new development, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be prepared. Additional mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the City's VMT traffic model results.

**G-5**

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant traffic impacts.

**G-5**

3. Caltrans promotes Smart Growth and recommends the City to balance housing and office developments within the City boundaries. This would be the ultimate approach to reduce VMT.

**G-6**

4. VMT Fee Program for all development within the City boundary in which the program has the potential to address transportation funding challenges, promote sustainability, and offer more flexible and equitable approaches to financing and managing transportation systems. Alternatively, the City may consider a new concept of VMT mitigation banks and exchanges. You may learn this new concept from the following link.

**G-7**

<https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/research-notes/task3886-rns-5-21-a11y.pdf#:~:text=A%20well%20developed%2C%20carefully%20structured%20VMT%20mitigation%20bank,pay%20for%20VMT%20reductions%20elsewhere%20in%20the%20region.>

5. As a reminder for each new development Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review those document at the following link:

**G-8**

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

6. For future projects any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods.

**G-9**

Jared Chavez  
September 29, 2023  
Page 4 of 4

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2022-04292-DEIR.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse



### Response to Comment Letter G

Miya Edmonson  
State of California Department of Transportation, District 7  
September 29, 2023

- G-1 This introductory paragraph summarizes the proposed Project. The comment is introductory in nature and does not contain any information requiring changes to the Draft EIR. No further response is warranted.
- G-2 This comment summarizes the substantiation of the thresholds used in Appendix F, Transportation Impact Analysis of the Draft EIR, based on the recommend thresholds in the California Office of Planning and Research (OPR) Technical Advisory. The comment states that a conservative approach for preparing a transportation analysis would be for the development of a vehicle miles traveled (VMT) threshold using the City, and not the County of Los Angeles as the geographic area to determine baseline conditions. The comment indicates that if the VMT analysis uses the geographic region of the City for Existing Conditions, the reduced threshold should be 8.39 VMT per capita and 13.82 VMT per employee.

The OPR Technical Advisory recommends that a lead agency may consider the average of the City or region as the geographical area to determine a threshold for residential projects. For office projects, OPR recommends the regional average. Per pages 15 and 16 of the OPR Technical Advisory, the thresholds for residential and office projects are:

- *Recommended threshold for residential projects: A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. Proposed development referencing a threshold based on city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the number of units specified in the SCS for that city, and should be consistent with the SCS.*
- *Recommended threshold for office projects: A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.*

The use of Los Angeles County as the geographical area to determine the VMT per capita (i.e. regional average) was determined to be appropriate and consistent with the OPR Technical Advisory. The City of Lawndale is part of the larger metropolitan area and the City's size (1.9 square miles), development composition, and location (contiguous to and surrounded by urbanized cities within the County), result in high integration with surrounding communities and the larger region. A significant amount of people that live in Lawndale work outside the City and vice-versa; therefore, many trips originate or end outside the City. Additionally, the use of Los Angeles County as the geographical area to determine VMT is appropriate, since the Project aligns with regional goals. As shown in Table 5.8-5, *Project Consistency with the 2020-2045 RTP/SCS* in the Draft EIR, the Project is consistent with the regional goals in the Southern California Regional Government (SCAG) Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS),



since the Project would allow for infill development in locations near existing transit routes, goods and services. The availability of public transportation and the focus on increasing density relative to the existing public transportation system, enables Project implementation to reduce VMT per service population. Therefore, the use of Los Angeles County as the geographical area to determine VMT thresholds is better aligned with regional goals in the SCAG 2020-2024 RTP/SCS to promote reductions in VMT.

The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.

- G-3 The comment from Caltrans states that with the recommended revised threshold the Project conditions VMT per capita and per employee would be significant and mitigation would be required. As discussed under Response G-2, the thresholds used in Appendix F, Transportation Impact Analysis of the Draft EIR are consistent with the recommendations in OPR's Technical Advisory. Therefore, no revisions to the thresholds would be necessary and no mitigation measures to reduce VMT beyond the reductions identified with the Project are required. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- G-4 The comment recommends that the Lead Agency evaluate Transportation Demand Management (TDM) strategies and Intelligent Transportation System applications in order to better manage the transportation network, as well as transit service, bicycle, and pedestrian connectivity improvements. As discussed in Section 5.17, *Transportation* in the Draft EIR, the Mobility Element developed as part of the General Plan Update includes policies to support the reduction of VMT. This includes, but is not limited to, Policy M-3.1, which requires the City to apply Complete Streets principles to all transportation improvement projects; Policy M-3.2 which directs the City to link activity centers, public facilities, and schools to transit and active transportation facilities; and Policy M-9.2 which requires TDM strategies as mitigation measures for new projects that exceed the City's VMT impact thresholds. The Draft EIR concluded that the Project does not exceed the Project VMT threshold and is consistent with the relevant SCAG RTP/SCS goals. Therefore, the Project's impacts related to VMT would be less than significant. Therefore, no mitigation measures to reduce VMT beyond the reductions identified with the Project are required. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- G-5 This comment states that the City should require a "post-development" VMT analysis to monitor VMT against thresholds and revisit mitigation measures for each new development, and provide new traffic data. As discussed in Section 5.17, *Transportation* in the Draft EIR, the Mobility Element developed as part of the General Plan Update includes policies to encourage cooperation with regional agencies, including Policy M-9.3 which encourages regional agencies such as Metro, the South Coast Air Quality Management District, and the South Bay Cities Council of Governments to promote TDM programs that reduce single occupancy vehicle travel. The Draft EIR concluded that the Project does not exceed the Project VMT threshold and is consistent with the relevant SCAG RTP/SCS goals. Therefore, the Project's impacts related to VMT would be less



- than significant. Therefore, no mitigation measures to reduce VMT beyond the reductions identified with the Project are required. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- G-6 This comment states that Caltrans promotes Smart Growth and recommends that the City balance housing and office developments. As discussed in Section 5.17, *Transportation* in the Draft EIR, the Land Use and Mobility elements developed as part of the General Plan Update includes policies to support the reduction of VMT, including increasing the balanced mix of residential and employment opportunities within the City with the proposed land uses. This includes the proposed Land Use Map, as well as Policy LU-1.1 which directs the City to provide a land use plan that promotes efficient development; and Policy LU-1.2 requires the balance of levels of employment and housing within the community. Additionally, the analysis found that implementation of the Project would result in reductions in VMT per capita and VMT per employee compared to 2023 existing conditions. The Draft EIR concluded that the Project does not exceed the Project VMT threshold and is consistent with the relevant SCAG RTP/SCS goals. Therefore, the Project's impacts related to VMT would be less than significant, and no mitigation measures to reduce VMT beyond the reductions identified with the Project are required. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- G-7 This comment recommends the City develop a VMT fee program for all development. The City currently collects development impact fees, including a traffic impact fee to ensure that development pay a fair share of the cost of capital facilities necessary to accommodate such development. As discussed in Section 5.17, *Transportation* in the Draft EIR, the Mobility Element developed as part of the General Plan Update includes policies and actions to support the reduction of VMT, including Policy M-5.3 which requires new developments to construct, when appropriate, transit facilities; Policy M-6.5 which requires new developments in the City to provide bicycle and pedestrian facilities; Action M-6a which directs the City as part of development review, to review any existing gaps in active transportation that inhibit mobility; and Policy M-9.2 which requires TDM strategies as mitigation measures for new projects that exceed the City's VMT impact thresholds. The Draft EIR concluded that the Project does not exceed the Project VMT threshold and is consistent with the relevant SCAG RTP/SCS goals. Therefore, the Project's impacts related to VMT would be less than significant, and no mitigation measures to reduce VMT beyond the reductions identified with the Project are required. The comment does not contain any information requiring changes to the Draft EIR. The comment is noted and no further response is warranted.
- G-8 This comment notes that Caltrans has published the VMT-focused Transportation Impact Study Guide and the Caltrans Interim Land Development and Intergovernmental Safety Review Practitioners Guidance. The comment is noted and no further response is warranted.
- G-9 This comment notes that future projects would be required to comply with Caltrans requirements for the transportation of heavy construction equipment and/or materials. The comment is noted and no further response is warranted.



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