

**COMMENTS AND RESPONSE TO  
COMMENTS  
MITIGATED NEGATIVE DECLARATION  
AND INITIAL STUDY**

---

**THE SALVATION ARMY BELL OASIS APARTMENTS  
5600 RICKENBACKER ROAD  
BELL, CALIFORNIA**



**LEAD AGENCY:**

**CITY OF BELL  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
6330 PINE AVENUE  
BELL, CALIFORNIA 90201**

**REPORT PREPARED BY:**

**BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING  
16388 EAST COLIMA ROAD, SUITE 206J  
HACIENDA HEIGHTS, CALIFORNIA 91745**

**MAY 17, 2016**

**BELL011**

## TABLE OF CONTENTS

<b>Section</b>	<b>Page</b>
1. Comment Letters Received .....	3
2. Comment Letter from Maryam Babaki.....	4
3. Comment Letter from Ruth Schwartz.....	12

## **1. COMMENT LETTERS RECEIVED**

The purpose of this report is to provide a record of the written comments that were received regarding the proposed Salvation Army Bell Oasis Apartments development. The Initial Study and Mitigated Negative Declaration (IS/MND) was circulated for a period of 20 days. While no comments were received during this review period, two letters that commented on the proposed project and the Initial Study/Mitigated Negative Declaration were received. These specific comments, the response to these comments, and the letters are provided herein. The comment letters that were received by the City include the following:

Ms. Maryam Babaki  
Director of Public Works & Development Services  
City of Commerce  
Letter Dated April 25, 2016

Ms. Ruth Schwartz, Executive Director  
Shelter Partnership  
Letter Dated April 20, 2016

## **2. COMMENT LETTER FROM MARYAM BABAKI**

**Letter Dated April 25, 2016**

**Ms. Maryam Babaki**

**Public Works & Development Services**

**City of Commerce**

### **Comment 1.**

*The City of Commerce writes this letter in order to comment on the abovementioned project. According to the Notice of Intent, the City of Bell is considering a development at 5600 Rickenbacker that will include, but is not limited to, the construction of a 64-unit apartment complex with an additional unit manager and totaling approximately 44,908 square feet.*

### **Response 1.**

The comment is noted for the record. No specific response is required.

### **Comment 2.**

*The project calls for 64 studio units. The project description does not clarify how many individuals will be assigned to each unit. This should be clarified as part of any decision making process.*

### **Response 2.**

The occupancy characteristics were outlined in Section 2.4.2 (Operational Characteristics). This section stated the following:

“The three new buildings will provide permanent housing and amenities for homeless individuals. The new development will accommodate tenants in 64 studio apartments and an on-site manager in a two-bedroom apartment. The projected resident population will be approximately 70 residents, assuming one resident per every studio unit with the occasional married couple or single parent with a young child. In addition, the manager’s unit will contain between one and two residents. In addition to being homeless, the tenants in 31 of the units must qualify by having incomes at less than 30% of area median income while the tenants in the remaining 33 studio units must have incomes between 30% and 50% of area median income. Most tenants will also have a physical, mental, health, or addiction-related disability and approximately half of the tenants will be military veterans. In addition to providing housing for qualifying individuals, The Salvation Army will provide counseling, medical and rehabilitation services to assist individuals in gaining independence.”

Almost all of the tenants will be occupied by a single person. Occasionally three units at any one time will be occupied by a married couple.. In addition, approximately three units will be vacant at any one time. As a result, the average occupancy at Bell Oasis Apartments will consist of approximately 66 people: two people in the manager's unit; 58 single people; three married couples.

It is highly unlikely that any children will reside at the Bell Oasis Apartments. However, a single woman will not be deemed to be ineligible due to pregnancy or by having a young child. If a young child does reside for a time at Bell Oasis Apartments, The Salvation Army will assure that appropriate supportive services are available for the family. Individuals with a school-aged child will not be accommodated due to the small size of the studio apartments.

**Comment 3.**

*Please clarify what type of housing product is proposed. The IS mentions homeless housing. Please clarify if this is extended stay living, or if this will be an overnight facility.*

**Response 3.**

A total of 64 units of permanent, supportive housing will be provided in fully independent apartments. Each unit will include a kitchen and bathroom. The Bell Oasis Apartments will not include transitional housing or emergency shelter. Eligible homeless adults will be allowed to continue to renew their annual leases.

**Comment 4.**

*Page 17 of the IS, item 5 describes the need for discretionary action. This section assumes "other" discretionary actions include the approval of a Tentative Parcel map, a conditional use permit, and a Parking Modification. [it is] unclear to the City of Commerce is the master discretionary approval that is required for the project. The City of Commerce would like to know if the proposal is allowed by right, or will the proposal require a review and or approval of any zone changes and or General Plan and/or Zoning Map Amendment? Please advise.*

**Response 4.**

The City of Bell, subsequent to the circulation of the IS/MND, determined that the Commercial Manufacturing (C-M) zone district that is currently applicable to the Cheli industrial area is not applicable to the project site. For this reason, City staff determined that a rezoning of the site to *General Commercial* and *Residential Zone* (C-3R) would be the most appropriate zoning designation that would accommodate the project, which requires an application to rezone the parcel. Therefore, the discretionary approvals now include the rezoning of the Bell Oasis Apartment site to C-3R, a tentative parcel map, a conditional use permit, and variances.

**Comment 5.**

*The first paragraph on Page 18 describes the IS process and states that under each issue area, an analysis of impacts will be provided in the form of questions and answers. It goes on to say the analysis then provides a response to the individual questions. After reviewing the checklist commencing on page 18 and ending at page 27, the City of Commerce determined that no section of the IS provides an answer to validate why there are no impacts to each of the checklist study areas. The IS has to be expanded to include any and all discussions necessary to support why the project*

*will not impact any of the sections of the environmental checklist. No action should be taken by the City of Bell until this information is provided.*

**Response 5.**

The analysis of the individual issues are provided in Section 3 of the IS/MND. Section 3 and Sections 3.1 through 3.18 go into detail as to the nature and extent of project impacts as well as any required mitigation.

**Comment 6.**

*Under Section 3.13 Population and Housing (page 24), the IS assumes there are no impacts as a result of the proposed project. The consideration of 64 new units has the potential to create some level of impact to Population and Housing. The City of Commerce is concerned that this needs to be addressed prior to any action that is considered by the City of Bell.*

**Response 6.**

Section 3.13 determined that the proposed project would not result in any displacement impacts since the project site is presently unoccupied. The project would provide much needed housing for those individuals with extremely low incomes consistent with the City of Bell's Regional Housing Needs Assessment (RHNA). The proposed development will not result in any adverse growth inducing impacts that would be expected with the implementation of market-rate housing.

**Comment 7.**

*Similarly, under Section 3.14 Public Services, there is no analysis supporting the conclusion that the introduction of 64 dwelling units will not impact Fire, Police, School or any other governmental service.*

**Response 7.**

The Los Angeles County Fire Department and other City and County Departments reviewed the proposed development plans for the project. The Fire Department will continue to review the subsequent designs and plans to ensure compliance with pertinent Fire Code requirements. The proposed project will also have an approved fire access plan. As a result, the City determined that there would not be any significant adverse impacts on the Fire Department related to the proposed project's implementation. The proposed facility will be occupied on a 24-hour basis and on-site security will be provided at all times. The facility operators have prepared a comprehensive system of cameras and security lighting throughout the project site. As a result, the IS/MND determined that the proposed project would not result on any adverse impacts on law enforcement services. The proposed project would not result in any school enrollment impacts since no children will be housed at the proposed facility. Furthermore, the proposed project will be required to pay any pertinent development fees to the local school district (MUSD).

**Comment 8.**

*Under section 3.17 Utilities (page 25), please show how the project is in compliance with SB 610. In 1995, the California Legislature enacted SB 901 (later codified in Water Code sections 10910-10915) to ensure that cities and counties would assess the adequacy of available water supplies to meet projected water demand prior to approving significant new land development projects. In 2001, perceived shortcomings in SB 901 compliance led the California Legislature to enact two further laws—SB 610 and SB 221—to tighten the linkage between water supply availability and land-use planning decisions. SB 610 focused on improving the Water Supply Assessment (WSA) procedure previously established by SB 901. Among other things, SB 610 expanded the scope of development projects triggering the WSA procedure and expanded the informational requirements of the procedure, particularly with respect to groundwater supplies. Taken from: <http://vwww.kmtq.com/node/1292#sthash.YoqRWCo.dpuf>*

**Response 8.**

The proposed project is under the 500-unit threshold indicated in the above-referenced Government Code sections. In determining whether a project would demand an amount of water equivalent to or greater than the amount of water required by a 500 dwelling unit project, it is generally acknowledged that one acre-foot of water can serve two to three households on an annual basis; therefore, one dwelling unit typically consumes .3 to .5 acre feet of water per year, depending upon several factors, including the regional climate. The Code indicates that the Lead Agency should contact its local water supplier to obtain its advice on the annual water demand for a development within the local community in order to determine whether the water demand for the development under consideration is equivalent to the water demand of a 500 dwelling unit project. While Water Code §10912(a) provides that a “project” may include a residential development of 500 or more dwelling units, Water Code §10912(b) provides a “sliding scale” for determining the size of a project to which SB 610 would apply, below 500 dwelling units. Since Section 10912(b) provides that a “project” is a proposed development that would increase the number of service connections for a public water system (which currently has fewer than 5,000 service connections) by ten percent or more, a “project” could be as few as 300 dwelling units. For example, a water utility that has 3,000 service connections would experience an increase in the number of service connections by ten percent if it were required to serve a proposed residential development of 300 units, thus making the 300-unit development a “project” under SB 610. Similarly, for water utilities that have more than 3,000 service connections, but fewer than 5,000 service connections, the “10 percent test” in Water Code § 10912(b) would apply in determining whether a proposed development is a “project” under SB 610.

**Comment 9.**

*On page 28, Mitigation Measure No. 8 talks about following Best Management Practices Identified in Sections IV and V of the Water Quality Management Plan. We are not able to locate the referenced sections. Please provide a copy for our review and consideration.*

## Response 9.

The reader apparently reviewed the Executive Summary and not the entire Initial Study and Mitigated Negative Declaration that was on a CD attached to the Executive Summary. The IS/MND's section that applies to the comment is provided below:

“The City of Bell is located within the central section of the Downey Plain and is underlain by the Central groundwater basin. Water-bearing deposits found beneath the Downey plain include unconsolidated and semi-consolidated marine and non-marine alluvial sediments that yield significant amounts of groundwater. Groundwater resources in the Central Basin consists of a body of shallow, unconfined and semi-perched water on the upper part of the alluvial deposits; the principal body of fresh groundwater within the Recent and Pleistocene deposits; and salt water under the freshwater resources. Groundwater basins are recharged by surface and subsurface flows from the bordering hills and mountains; by downward percolation of waters from major streams; and by direct percolation of rain and artificial recharge at spreading basins or injection wells.<sup>1</sup> The discharge of the groundwater is through pumping for domestic use and flows to the ocean through sewers and drainage channels. Water-bearing deposits are unconsolidated and semi-consolidated alluvial sediments that hold water and allow water to pass through, and are referred to as aquifers. Non-water-bearing deposits are consolidated rocks and ground layers which provide limited water and form the boundaries between aquifers. The geologic structure underlying the Bell area consists of a topmost layer of deposition from recent time (15,000 years ago), consisting of alluvium and the Gaspar Aquifer.<sup>2</sup>

Future water consumption will be limited to that used for landscaping, restroom use, and routine maintenance and cleaning. The new buildings will also involve the installation of water-conserving plumbing in conformance with local ordinances that require water-conserving equipment and plumbing fixtures as a means to reduce water consumption. While no significant adverse impacts on water quality are anticipated as part of the proposed project's construction and subsequent operation, the following mitigation measures will be required:

- The plans and specifications shall require the contractors to implement the Best Management Practices (BMPs) identified in Section IV of the Water Quality Management Plan, as well as be the responsible party for inspection and maintenance as identified in Section V of the Water Quality Management Plan.
- During construction, disposal of refuse and other materials should occur in a specified and controlled temporary area on-site physically separated from potential storm water runoff, with ultimate disposal in accordance with local, State and Federal requirements.
- Sediment from areas disturbed by construction shall be retained on-site using structural controls to the maximum extent practicable. Stockpiles of soil shall be properly contained to

---

<sup>1</sup> Blodgett Baylois Environmental Planning. *Site survey*. Survey was conducted on March 11, 2016.

<sup>2</sup> Ibid.

COMMENTS AND RESPONSE TO COMMENTS  
INITIAL STUDY • MITIGATED NEGATIVE DECLARATION  
THE SALVATION ARMY BELL OASIS APARTMENTS • 5600 RICKENBACKER ROAD • BELL, CALIFORNIA

eliminate or reduce sediment transport from the site to the streets, drainage of facilities or adjacent properties via runoff, vehicle tracking, or wind.

The implementation of the aforementioned mitigation measures will ensure that the potential water quality impacts are reduced to levels that are less than significant.”



## CITY OF COMMERCE

### Public Works & Development Services Department

April 25, 2016

Alex Chacon  
City of Bell  
Department of Community Development  
6330 Pine Avenue  
Bell, California 90201

**Re: Comments on Proposed Notice of Intent to Adopt a Mitigated Negative Declaration in Conjunction with a project at 5600 Rickenbacker Road in the City of Bell.**

Mr. Chacon,

The City of Commerce writes this letter in order to comment on the abovementioned project. According to the Notice of Intent, the City of Bell is considering a development at 5600 Rickenbacker that will include, but is not limited to, the construction of a 64-unit apartment complex with an additional unit manager and totaling approximately 44,908 square feet.

The Initial Study ("IS") lacks the following information:

- The project calls for 64 studio units. The project description does not clarify how many individuals will be assigned to each unit. This should be clarified as part of any decision making process.
- Please clarify what type of housing product is proposed. The IS mentions homeless housing. Please clarify if this is extended stay living, or if this will be an overnight facility.
- Page 17 of the IS, item 5 describes the need for discretionary action. This section assumes "other" discretionary actions include the approval of a Tentative Parcel map, a conditional use permit, and a Parking Modification. Unclear to the City of Commerce is the master discretionary approval that is required for the project. The City of Commerce would like to know if the proposal is allowed by right, or will the proposal require a review and or approval of any zone changes and or General Plan and/or Zoning Map Amendment? Please advise.
- The first paragraph on Page 18 describes the IS process and states that under each issue area, an analysis of impacts will be provided in the form of questions and answers. It goes on to say the analysis then provides a response to the individual questions. After reviewing the checklist commencing on page 18 and ending at page 27, the City of Commerce determined that no section of the IS provides an answer to validate why there are no impacts to each of the checklist study areas. The IS has to be expanded to include any and all discussions necessary to support why the project will not impact any of the sections of the environmental checklist. No action should be taken by the City of Bell until this information is provided.

---

2535 Commerce Way • Commerce, California 90040 • (323) 722-4805 • FAX (323) 838-4240

COMMENTS AND RESPONSE TO COMMENTS  
INITIAL STUDY • MITIGATED NEGATIVE DECLARATION  
THE SALVATION ARMY BELL OASIS APARTMENTS • 5600 RICKENBACKER ROAD • BELL, CALIFORNIA

- Under Section 3.13 Population and Housing (page 24), the IS assumes there are no impacts as a result of the proposed project. The consideration of 64 new units has the potential to create some level of impact to Population and Housing. The City of Commerce is concerned that this needs to be addressed prior to any action that is considered by the City of Bell.
- Similarly, under Section 3.14 Public Services, there is no analysis supporting the conclusion that the introduction of 64 dwelling units will not impact Fire, Police, School or any other governmental service.
- Under section 3.17 Utilities (page 25), please show how the project is in compliance with SB 610. In 1995, the California Legislature enacted SB 901 (later codified in Water Code sections 10910-10915) to ensure that cities and counties would assess the adequacy of available water supplies to meet projected water demand prior to approving significant new land development projects. In 2001, perceived shortcomings in SB 901 compliance led the California Legislature to enact two further laws—SB 610 and SB 221—to tighten the linkage between water supply availability and land-use planning decisions. SB 610 focused on improving the Water Supply Assessment (WSA) procedure previously established by SB 901. Among other things, SB 610 expanded the scope of development projects triggering the WSA procedure and expanded the informational requirements of the procedure, particularly with respect to groundwater supplies. Taken from: <http://www.kmtg.com/node/1292#sthash.YogRYVCo.dpuf>
- On page 28, Mitigation Measure No. 8 talks about following Best Management Practices Identified in Sections IV and V of the Water Quality Management Plan. We are not able to locate the referenced sections. Please provide a copy for our review and consideration.

The City of Commerce is requesting additional information regarding the abovementioned project before the City of Bell takes any action on the project. As such, please accept these comments and add them to your administrative record for the project. Please let us know when we can expect to hear from your office. In the interim, if you have any questions regarding our comments, you can reach out to the City Planner, Jose Daniel Jimenez at (323) 722-4805 ext. 2389 or via email at [jjimenez@ci.commerce.ca.us](mailto:jjimenez@ci.commerce.ca.us). His office hours are 8:00 a.m. to 6:00 p.m., Monday through Thursday.

Sincerely,



Maryam Babaki  
Director of Public Works & Development Services

Cc: Jorge Rifa, Matt Rodriguez, Eddie Olivo, Matt Marquez, Jose Jimenez, 2016 Reading File

### **3. COMMENT LETTER FROM RUTH SCHWARTZ**

**Letter Dated April 20, 2016**

**Ms. Ruth Schwartz, Executive Director  
Shelter Partnership**

#### **Comment 1.**

*Dear Mayor Romero and Council Members, Please accept these comments with regard to the above-referenced action. Shelter Partnership, Inc., is a policy and advocacy organization working to end homelessness in Los Angeles County. We also own and manage the S. Mark Taper Foundation Shelter Resource Bank on Rickenbacker Road in the City of Bell, a unique 108,000 sq. ft. warehouse that distributes, free of charge, donations of surplus inventory from manufacturers, wholesalers, retailers, and others to homeless service agencies throughout Los Angeles County, serving more than 250 organizations each year.*

#### **Response 1.**

The comment is noted for the record. No response is required.

#### **Comment 2.**

*In our capacity as homeless policy advisors, we are aware of the nationwide consensus among academic researchers, service providers, government agencies, and housing professionals that permanent supportive housing is the most effective model for ending chronic homelessness. Permanent supportive housing combines affordable housing with readily available services to ensure successful long-term tenancies. Research clearly demonstrates that the appropriate services component of permanent supportive housing both solves homelessness and makes for good neighbors in any community.*

#### **Response 2.**

The comment is noted for the record. No response is required.

#### **Comment 3.**

*You have the opportunity to permit such a permanent supportive housing project in the City of Bell. The Salvation Army Bell Oasis Apartments will house homeless adults who have been living on the streets or in shelters, with a priority for homeless veterans. The lead service provider, The Salvation Army, has an excellent record of providing services to this population. The financial package they have assembled includes funding not only to build this housing, but also to provide the services that will help formerly homeless tenants succeed and allow them to live with dignity.*

**Response 3.**

The comment is noted for the record. No response is required.

**Comment 4.**

*No veteran who has served his or her county should be homeless. You have the opportunity to house homeless veterans who, because of the services The Salvation Army will provide, will flourish and be good neighbors to others in the City of Bell.*

**Response 4.**

The comment is noted for the record. No response is required.

**Comment 5.**

*We urge you to permit The Salvation Army Bell Oasis Apartments.*

**Response 5.**

The comment is noted for the record. No response is required.



## Shelter Partnership

520 South Grand Avenue, Suite 895 • Los Angeles, CA 90071 • Fax 213-689-3188 • 213-688-2188

April 20, 2016

Mayor Alicia Romero  
and Members of the Bell City Council  
City of Bell  
6330 Pine Avenue  
Bell, CA 90201

**Re. The Salvation Army Bell Oasis Apartments - Bell City Council - public hearing,  
Wednesday, April 27 at 7 PM**

Dear Mayor Romero and Council Members,

Please accept these comments with regard to the above-referenced action.

Shelter Partnership, Inc., is a policy and advocacy organization working to end homelessness in Los Angeles County. We also own and manage the S. Mark Taper Foundation Shelter Resource Bank on Rickenbacker Road in the City of Bell, a unique 108,000 sq. ft. warehouse that distributes, free of charge, donations of surplus inventory from manufacturers, wholesalers, retailers, and others to homeless service agencies throughout Los Angeles County, serving more than 250 organizations each year.

In our capacity as homeless policy advisors, we are aware of the nationwide consensus among academic researchers, service providers, government agencies, and housing professionals that permanent supportive housing is the most effective model for ending chronic homelessness. Permanent supportive housing combines affordable housing with readily available services to ensure successful long-term tenancies. Research clearly demonstrates that the appropriate services component of permanent supportive housing both solves homelessness and makes for good neighbors in any community.

You have the opportunity to permit such a permanent supportive housing project in the City of Bell. The Salvation Army Bell Oasis Apartments will house homeless adults who have been living on the streets or in shelters, with a priority for homeless veterans. The lead service provider, The Salvation Army, has an excellent record of providing services to this population. The financial package they have assembled includes funding not only to build this housing, but also to provide the services that will help formerly homeless tenants succeed and allow them to live with dignity.

No veteran who has served his or her country should be homeless. You have the opportunity to house homeless veterans who, because of the services The Salvation Army will provide, will flourish and be good neighbors to others in the City of Bell.

RECEIVED 04-22-'16 11:19 FROM- 2136893188

TO- City of Bell

P0002/0003

COMMENTS AND RESPONSE TO COMMENTS  
INITIAL STUDY • MITIGATED NEGATIVE DECLARATION  
THE SALVATION ARMY BELL OASIS APARTMENTS • 5600 RICKENBACKER ROAD • BELL, CALIFORNIA

Letter from Shelter Partnership, Inc. to Mayor Alicia Romero  
and Members of the Bell City Council  
Re. The Salvation Army Bell Oasis Apartments, Bell City Council Hearing, Wednesday, April 27  
Page 2

We urge you to permit The Salvation Army Bell Oasis Apartments.

If I may provide additional information, please do not hesitate to contact me at  
[rschwartz@shelterpartnership.org](mailto:rschwartz@shelterpartnership.org).

Sincerely,



Ruth Schwartz  
Executive Director

RECEIVED 04-22-'16 11:19 FROM- 2136893188

TO- City of Bell

P0003/0003