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*Via Email*

March 18, 2024

Jonathan Kwan, Planner  
Community Development Department  
City of Norwalk  
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[planning@norwalkca.gov](mailto:planning@norwalkca.gov)

**Re: Comment on Draft Environmental Impact Report, Norwalk Transit Village (SCH NO. 2022070103)**

Dear Mr. Kwan:

This comment is submitted on behalf of **Supporters Alliance for Environmental Responsibility (“SAFER”)** regarding the Draft Environmental Impact Report (“DEIR”) prepared for the Norwalk Transit Village (SCH NO. 2022070103), which proposes the construction of a new approximately 66,647 square-foot neighborhood commercial center, a 150-key hotel, and 770 new residential units consisting of a mix of multi-family units, apartments, and townhomes, located at 13200 Bloomfield Avenue (APN 8045-008-902) in the City of Norwalk (“Project”).

O2-1

SAFER is concerned that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. Among other concerns, SAFER has identified the following issues:

1. The DEIR concludes that the Project will have significant unmitigated greenhouse gas (GHG) impacts. Yet, the DEIR fails to propose all feasible mitigation measures. A Revised DEIR should be prepared to analyze the following mitigation measures, and require implementation of the measures unless they are proven to be infeasible:
  - a. 100% electric vehicle charging.
  - b. Solar photo-voltaic rooftop.
  - c. Heat-pumps for heating and cooling.
  - d. Light-colored roofing materials to reduce heat-island effect.
  - e. Local-hire requirement for construction workers to reduce worker travel distances and related vehicle emissions.

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- f. Reduce water usage and related water pumping requirements by requiring xeroscaping, and low-water usage fixtures.
- g. LEED certified building.
- h. Consider all measures suggested in California Attorney General Greenhouse Gas Guidance Document. ([chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://opr.ca.gov/docs/june08-ceqa.pdf?](https://opr.ca.gov/docs/june08-ceqa.pdf))

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2. Since the Project will have significant unmitigated impacts, the City must analyze whether the Project's economic benefits exceed its environmental impacts before adopting a statement of overriding considerations. (14 Cal.Code Regs. §15043; Pub. Res. Code §21081(B); *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222). Key among the findings that the lead agency must make is that:

**“Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report...[and that those] benefits of the project outweigh the significant effects on the environment.”**(Pub. Res. Code §21081(a)(3), (b)).

O2-3

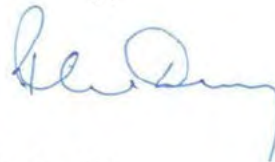
Thus, the City must analyze whether the Project provides “employment opportunities for highly trained workers.” The DEIR contains no such analysis.

SAFER requests that the Community Development Department address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project.

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SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,



Richard Drury  
Lozeau Drury LLP